



**SP ENERGY  
NETWORKS**

# **The Kendoon to Tongland 132kV Reinforcement Project**

## **Summary of Feedback from Second Round of Consultation**

**March 2017**

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## **Purpose of this document**

SP Energy Networks (SPEN) is pleased to provide this report summarising the feedback received during the second round of public consultation, carried out over three months in 2016, on the proposed Kendoon to Tongland 132kV Reinforcement (KTR) Project.

In total 107 pieces of feedback were received and scrutinised.

# Executive summary

## Background

The existing electricity transmission network in Dumfries and Galloway is typically a 132 kilovolt (kV) interconnected system.

Much of this infrastructure is approaching the end of its life and is not fit for purpose. Improving it is essential for the security of supply for existing and future users of this network. Major investment in the network now will serve users for the next 60 to 70 years and will also increase its capacity.

SPEN proposes to develop a new 132kV electricity transmission network between Polquhanity (about 3km north of Kendoon) and Tongland, a distance of around 44km, comprising the KTR Project.

This upgraded transmission network will replace the existing end-of-life 132kV lattice steel tower overhead line and enhance local security of electricity supply. The upgrade will also allow SPEN the opportunity to remove approximately 90km of existing 132kV lattice steel tower overhead line infrastructure that is no longer required.

The KTR Project consists of proposals for:

- A new 132kV double circuit steel tower overhead line between Polquhanity, around 3km north of the existing Kendoon substation, and the existing Kendoon substation;
- A new 132kV double circuit steel tower overhead line between the existing Kendoon substation and the existing Glenlee substation;
- A new 132kV single circuit wood pole overhead line between Carsfad and Kendoon;
- A new 132kV single circuit wood pole overhead line between Earlstoun and Glenlee;
- A new 132kV double circuit steel tower overhead line between Glenlee and Tongland; and
- Extending the existing 132kV Glenlee substation.

Once the new overhead lines and substation works have been completed and commissioned, SPEN will remove the existing 132kV steel tower overhead lines from Polquhanity to Kendoon, Kendoon to Glenlee (including Carsfad and Earlstoun), Glenlee to Tongland, and Tongland to Dumfries.

## Second 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 meet the overarching objective of the KTR Project to cause the 'least disturbance'<sup>1</sup>, 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 second round of consultation, which took place during 2016, is one of three rounds of consultation SPEN is planning for the KTR Project before applying for consent from Scottish Ministers to build the project.

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<sup>1</sup> Listed in paragraph 2.2.1

The second round of consultation focussed on preferred routes for new high voltage overhead lines; any alternative route options considered during the appraisal process; any other issues, suggestions or feedback; and the removal of existing overhead lines.

SPEN posted leaflets (**Appendix F**) to around than 3,500 homes and businesses within a kilometre of its study area in Dumfries and Galloway. The leaflet gave an overview of the project, explained how people could find out more detailed information and set out how they could make their views known.

This was supported by the project website [www.spendgsr.co.uk](http://www.spendgsr.co.uk).

Briefings were offered to elected representatives of Dumfries & Galloway Council, in whose area the project is proposed, as well as local Members of the Scottish Parliament and the Member of Parliament. Information was also sent to other statutory consultees, community councils, 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 using 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 second round of consultation, SPEN held four drop-in exhibitions and events across the project consultation zones and in Dumfries, which were attended by 186 people including 10 school pupils. Members of the project team also attended meetings with other individuals and organisations on request and actively engaged with a number of local interest groups.

SPEN also included a 3D computer visualisation at exhibitions, allowing people to view an impression of how the line might look from personal or favourite viewpoints.

## Feedback

The views of local people, organisations and bodies are very important to the effective development of the project.

In line with the much reduced scope and scale of the KTR Project since the first round of consultation in 2015 there were considerably fewer responses to the second round of consultation, both in actual numbers and as a percentage of people within the consultation zone.

During the second round of consultation, some 107 pieces of feedback were received. These encompassed comments from 103 named individual members of the public and other consultee organisations and four whose comments were anonymous or unidentified. The feedback comprised 44 official consultation feedback forms and 63 pieces of feedback in other formats, of which there were items from five statutory organisations. Every feedback form, letter and email received was recorded, together with comments minuted at consultation meetings, 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 development of the proposals comprising the project.

## Comments on the project in general

There was acceptance of the need to replace ageing assets and there was a view that the scheme's scale was more acceptable than the larger Dumfries and Galloway Strategic Reinforcement Project (DGSR).

Many people's principal concern remained the visual impact of the project, both for themselves personally and for the region of Dumfries and Galloway.

A considerable number of people disagreed with SPEN's choice of preferred corridor, comprising the study area, for identification of potential routes in Zone C, with a strong preference for the new route to follow the same broad corridor as the existing 132kV overhead line east of Loch Ken.

As in the last round of consultation, there were a significant number of comments expressing support for undergrounding all or part of the KTR Project, and a number of people, including elected representatives, saw merit in the idea of placing part of the new connection between Glenlee and Tongland under Loch Ken.

To read the summaries of the comments of members of the public on the need and general approach to the KTR Project, and SPEN's responses to them, please see section 6.2 of this report. Comments from other stakeholder organisations are contained within **Appendices A to E**.

## Comments on the preferred routes

The majority of feedback received related to the route options within Zone C (Glenlee to Tongland), with section 2 (in the vicinity of Mossdale) receiving the most feedback. Comments included support for SPEN's preferred route within this zone/section, as well as preferences for alternative route options considered by SPEN. A number of suggested new routes, or deviations, from SPEN's preferred route were also received and SPEN has actively considered each of these via the appraisal process.

To read the summaries of the comments of members of the public on the route options considered for the KTR Project, and SPEN's responses to them, please see section 6.4 of this report. Comments from other stakeholder organisations are contained within **Appendices A to E**.

## Comments on SPEN's consultation

People's comments were largely complimentary about SPEN's consultation process during this round of consultation, although there were a number of comments and suggestions which SPEN will take into account for the next phase of consultation on the project.

To read the summaries of the comments of members of the public on SPEN's consultation process, and SPEN's responses to them, please see section 6.5 of this report. Comments from other stakeholder organisations are contained within **Appendices A to E**.

## SPEN's conclusions from the second round of consultation

SPEN has reviewed and considered in detail all feedback received from the public, consultee bodies and local interest groups in relation to the second round of consultation, together with a number of additional technical studies and further environmental field work to inform SPEN's response to local issues raised.

The feedback received has informed SPEN's review of the KTR Project with regards to the following:

- SPEN's preferred routes in each of the consultation zones;
- Any of the alternative route options SPEN had considered during the appraisal process;
- Any other issues, suggestions or feedback respondents felt SPEN should consider; and
- The consultation process itself.

The feedback also suggested a number of route modifications or deviations which SPEN has mapped and appraised in line with the criteria applied to its original routes. These have resulted in some changes to the routes SPEN now propose to take forward to the next phase of the project, which is detailed alignment and Environmental Impact Assessment.

The conclusions of the review during the second round of consultation are in Chapter 8. However, the key findings can be summarised as follows:

### Routeing

- Polquhanity to Kendoon (Zone A): Preferred route B, with a modification near Polquhanity, has been confirmed as the proposed route between Polquhanity and Kendoon as outlined in Chapter 8 and shown in **Figure 8.2a**;
- Kendoon to Glenlee (Zone B): Preferred route A has been confirmed as the proposed route between Kendoon and Glenlee as outlined in Chapter 8 and shown in **Figure 8.2b**;
- Carsfad and Earlstoun connections: The preferred routes have been confirmed as the proposed routes;
- Glenlee to Tongland (Zone C): Preferred routes 1A, 2B, 3C, 4A and 5B, with modifications near Darsalloch, Stroan Loch, Slogarie and Edgerton, have been confirmed as the proposed route between Glenlee and Tongland as outlined in Chapter 8 and in **Figures 8.2c-e**.

These routes will be progressed to the detailed alignment and Environment Impact Assessment (EIA) stage.

## Consultation strategy

- Further clarification on the scale and design of potential new structures will be provided in the next round of consultation;
- Further clarification on the work to be carried out at substations will be provided in the next round of consultation;
- We will use 3D visualisations to provide greater clarity on the visual and cumulative effect of new lines from key viewpoints;
- Changes to routes or study areas resulting from the second round of consultation will be given greater prominence in future consultation materials; and
- Timings of exhibitions will be made more prominent in consultation materials.

# 1 Overview

## 1.1 Introduction

- 1.1.1 The new overhead lines forming part of the Kendoon to Tongland 132kV Reinforcement (KTR) Project will require the submission of applications for consent under section 37 of the Electricity Act 1989 and deemed planning permission. These will be determined by Scottish Ministers. This process will be administered by the Scottish Government Energy Consents and Deployment Unit (ECDU).
- 1.1.2 There are no formal pre-application requirements for consultation as part of the section 37 consent process. However best practice guidance encourages applicants to engage stakeholders and the public while developing their proposals in advance of an application being made. Guidance on the application process is outlined in ECDU's *Good Practice Guidance (January 2013)*.
- 1.1.3 SPEN's consultation strategy has therefore been built around consulting on proposals at each stage of the development process to ensure that all stakeholders and individuals with an interest are kept up to date and, most importantly, have a chance to influence the development of the project. A fundamental part of this approach is reporting back to both stakeholders and decision makers on how the feedback received has actually influenced the development of the project.
- 1.1.4 The purpose of the second round of consultation was to invite the views of statutory and non-statutory consultees, the public and local communities close to preferred routes on a range of issues, including alternative routes.
- 1.1.5 The feedback received will inform the development of the project as well as the next round of pre-application consultation which SPEN proposes to undertake. All work undertaken on pre-application consultation will be detailed in a final pre-application consultation (PAC) report to be submitted with the eventual section 37 applications to Scottish Ministers.
- 1.1.6 The PAC report will demonstrate how feedback from consultees has influenced the development of the project as well as how the consultation itself has complied with relevant legislation and guidance.

## 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

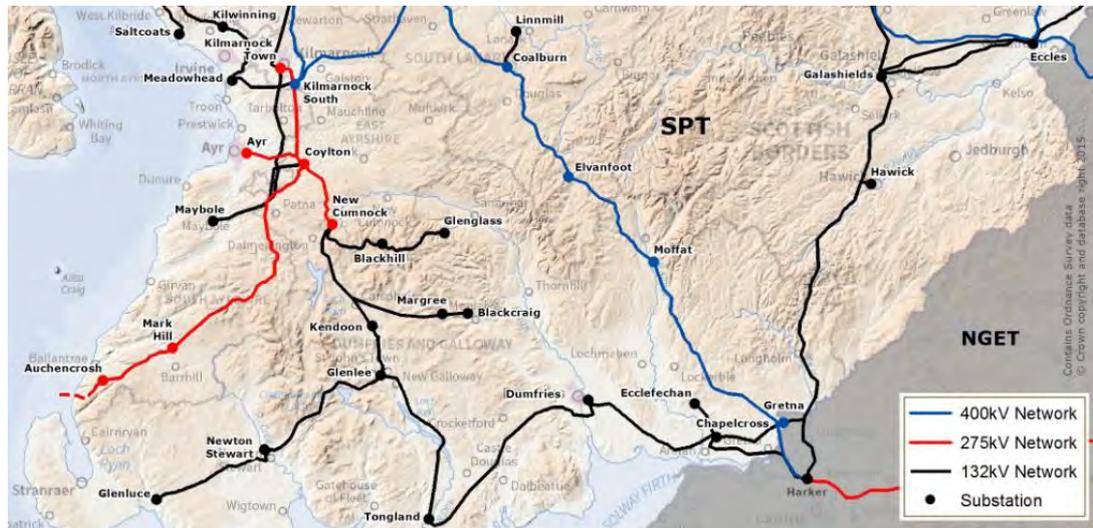
- 1.3.1 Stakeholder and public involvement is an important component of the UK planning (and consenting) system. Legislation and government guidance aims to ensure that the public, local communities, statutory and other consultees and interested parties have an opportunity to have their views taken into 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 a project's development, and continues into construction once consent has been granted.
- 1.3.3 Its approach to stakeholder engagement for major electricity 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 Kendoon to Tongland 132kV Reinforcement (KTR) Project

### 2.1 Need for the project

- 2.1.1 The existing electricity transmission system in the south-west of Scotland was developed between the 1930s and 1970s to supply local customers and to connect the area's hydro generation schemes. It currently serves more than 83,000 customers.
- 2.1.2 The system is shown in **Figure 2.1**. A 132kV overhead line runs from Glenluce to Newton Stewart, then on to Glenlee, before heading north towards Dalmellington and south to Tongland. From Tongland, the line heads east via Dumfries towards Gretna, where a 400kV line heads south, across the border into England, connecting 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 Electricity transmission system in south-west Scotland**



- 2.1.3 SPEN assesses this network as part of its asset replacement programme, with nearly 90km of the transmission lines in Dumfries and Galloway approaching the end of their operational life. These included the lines running from Kendoon to Glenlee, from Glenlee to Tongland, and from Tongland to Dumfries. As assets get older, 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 The KTR Project will include upgrading the existing 132kV transmission network between Polquhanity (which is approximately 3km north of the existing Kendoon substation), Kendoon, Carsfad, Earlstoun, Glenlee and Tongland, to replace existing end-of-life infrastructure, enhance security of supply and provide some additional capacity.

## 2.2 Description of the project

### 2.2.1 SPEN's overarching objective for the KTR Project is:

*"To identify a technically feasible and economically viable route for a continuous 132kV overhead line connection supported on lattice steel towers from Polquhanity to Kendoon, from Kendoon to Glenlee, and from Glenlee to Tongland. The project is also required to identify new 132kV overhead line connections supported on Trident wood poles from Carsfad to Kendoon, and from Earlstoun to Glenlee. The routes should, on balance, cause the least disturbance to the environment and the people who live, work and enjoy recreation within it."*

### 2.2.2 The KTR Project proposes the following:

- A new 132kV double circuit steel tower overhead line between Polquhanity, which is around 3km north of the existing Kendoon substation, and the existing Kendoon substation;
- A new 132kV double circuit steel tower overhead line between the existing Kendoon substation and the existing Glenlee substation;
- A new 132kV single circuit wood pole overhead line between Carsfad and Kendoon;
- A new 132kV single circuit wood pole overhead line between Earlstoun and Glenlee;
- A new 132kV double circuit steel tower overhead line between Glenlee and Tongland; and
- Extending the existing 132kV Glenlee substation.

### 2.2.3 Once the new overhead lines and substation works comprising the KTR Project have been completed and commissioned, there would be an opportunity to remove the existing 132kV steel tower overhead lines from Polquhanity to Kendoon, Kendoon to Glenlee (including Carsfad and Earlstoun), Glenlee to Tongland, and Tongland to Dumfries. SPEN intends undertake the removal of these overhead lines. Further details of the components of the KTR Project (listed in 2.2.2 above) are provided in Chapter 2 of the *KTR Project: Routeing and Consultation Document (October 2016)*, which can be found on the project website [www.spendgsr.co.uk](http://www.spendgsr.co.uk).

### 2.2.4 The locations of the existing overhead lines in the area are shown on **Figure 2.2**. Those overhead lines which will be removed following the implementation of the KTR Project have also been shown.

# Kendoon to Tongland Routeing Consultation

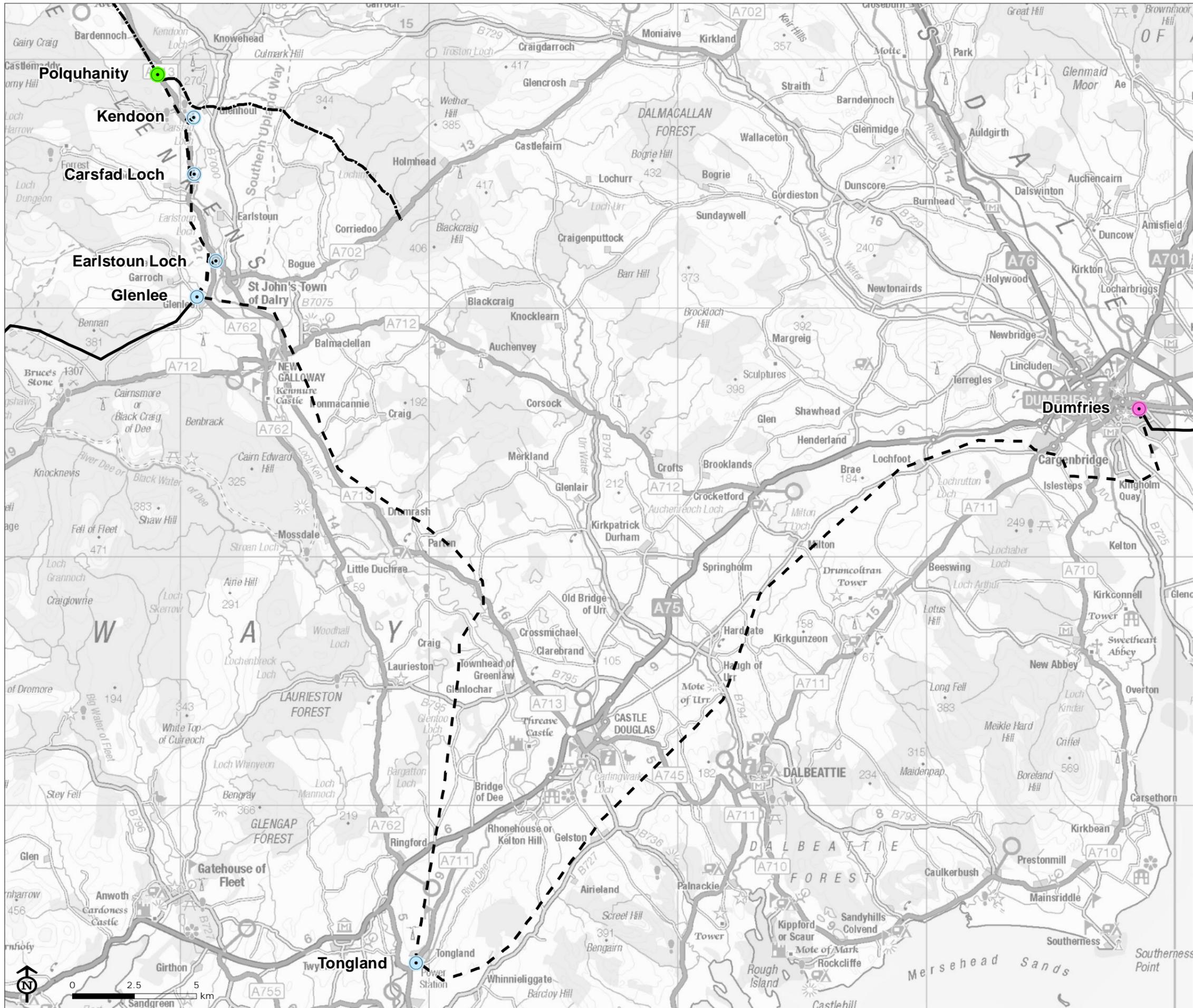
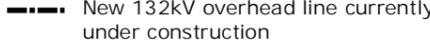


Figure 2.2: KTR Existing Network and Points of Connection

-  Polquhany Sealing End and Terminal Tower
-  Substation and Hydro electricity generating station
-  Substation
-  Existing 132kV overhead line to remain
-  Existing 132kV overhead line to be removed (following implementation of the KTR Project)
-  New 132kV overhead line currently under construction

Map Scale @ A3: 1:150,000





## 3 The second round of consultation

### 3.1 Overview

- 3.1.1 As explained in paragraph 1.3.2, SPEN is keen to engage with stakeholders who may have an interest in the project.
- 3.1.2 This is done by effective, inclusive and meaningful engagement with the local community, statutory consultees and other interested parties. SPEN's commitment to engaging with those communities affected by its activities is 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 This section of the report sets out the legislative process with regard to consultation; details of stakeholder engagement conducted by SPEN between the first and second rounds of consultation; the development of SPEN's consultation strategy; the activities undertaken during the second round of consultation; and the range of people and organisations consulted.

### 3.2 Legislation and guidance

- 3.2.1 The new overhead lines forming part of the Kendoon to Tongland 132kV Reinforcement (KTR) project will require the submission of applications for consent under section 37 of the Electricity Act 1989 and deemed planning permission. These will be determined by Scottish Ministers. This process will be administered by the Scottish Government Energy Consents and Deployment Unit (ECDU).
- 3.2.2 While there are no formal requirements for pre-application consultation (PAC) as part of the section 37 consent process, there is a requirement for PAC under the Town and Country Planning (Scotland) Act 1997. SPEN is embracing best practice guidance which encourages applicants to engage with stakeholders and the public in order to develop its proposals in advance of an application being made. This guidance is outlined in the *Scottish Government Energy Consents and Deployment Unit's Good Practice Guidance (January 2013)*.
- 3.2.3 For this reason, SPEN has developed a consultation strategy for early phases of consultation which broadly aims to meet the requirements of PAC.
- 3.2.4 SPEN considers that the KTR Project should be subject to three rounds of consultation. These are:
- First round (complete) – Public consultation on preferred corridors, which was carried out from 8 June to 31 August 2015;
  - Second round (complete) – Public consultation on preferred routes, which was carried out from 31 October to 21 December 2016; and
  - Third round – Public and pre-application consultation on detailed route alignment, which is expected to take place in 2017.

- 3.2.5 Following the submission of the applications for section 37 consent and deemed planning permission, the Scottish Government Energy Consents and Deployment Unit will carry out further consultation with the public and stakeholders, including Dumfries & Galloway Council.

### 3.3 Stakeholder engagement between the first and second rounds of consultation

- 3.3.1 SPEN has engaged with statutory and non-statutory consultees from an early stage in the development of the project.
- 3.3.2 The Statutory Stakeholder Liaison Group (SSLG), formed in 2014, consists of all the KTR Project's statutory consultees and continues to meet frequently to ensure good lines of communication are maintained and to act as a forum for considering the planning, environmental, cultural and natural heritage issues that arise from the project. The SSLG is chaired by the Scottish Government and is made up of the relevant planning authorities, statutory consultees and SPEN. It aims to meet on a regular basis throughout the lifetime of the project. The Terms of Reference for the SSLG can be found in **Appendix I**.
- 3.3.3 Before the second round of consultation began, the membership of the SSLG was amended to reflect the reduced geographical extent of the KTR Project. A meeting with the amended group was held to inform the routeing methodology and the consultation strategy for the KTR Project.
- 3.3.4 Below is a list of SSLG member organisations prior to the start of the second round of consultation:
- Scottish Government Energy Consents and Deployment Unit (ECDU);
  - Dumfries & Galloway Council;
  - Scottish Environment Protection Agency (SEPA);
  - Historic Scotland;
  - Scottish Natural Heritage (SNH); and
  - Forestry Commission Scotland.

### 3.4 Developing the consultation strategy

- 3.4.1 SPEN's consultation strategy for the KTR Project is founded on a premise of consulting on proposals at each stage of the development process, ensuring that all stakeholders and individuals with an interest are kept up to date and, most importantly, have a chance to influence the development of the project.
- 3.4.2 A fundamental part of this is reporting back to both stakeholders and decision makers on how the feedback received has actually influenced the development of the project.

- 3.4.3 The strategy for the first round of consultation was based on the statutory requirements and government guidance on consultation for energy consents outlined in section 3.2 of this report. It was designed to ensure that stakeholders:
- Had access to project information and understood its development;
  - Could put forward their own views and be confident that issues raised would be considered;
  - Played an active role in developing and influencing SPEN's proposals; and
  - Received timely responses and were informed about progress and outcomes.
- 3.4.4 Building on this, prior to the start of the second round of consultation SPEN engaged with statutory stakeholders to set out an improved approach and framework. This took account of feedback about the consultation process itself received during the first round. A full list of feedback which influenced the strategy for the second round can be found in **Appendix J**.
- 3.4.5 Statutory stakeholders were consulted on the consultation strategy in August 2016 as part of SPEN's ongoing dialogue with them through the SSLG.
- 3.4.6 No amendments were proposed by the SSLG in respect of SPEN's consultation strategy for the second round of consultation.

## 3.5 Overview of activities in the second round of consultation

- 3.5.1 The first round of consultation resulted in the identification of proposed corridors for the KTR Project. These corridors became the study areas within which SPEN subsequently identified preferred routes for new overhead lines.
- 3.5.2 The second round of consultation sought to gather feedback on these routes to help SPEN conclude which to take forward to the next stage of routeing. This was done by:
- Explaining the development, changes and ongoing need for the KTR Project;
  - Explaining the process SPEN used to identify preferred routes and why these were the most appropriate option based upon engineering, environmental, economic and community considerations;
  - Inviting statutory and non-statutory consultees, other bodies, the public and local communities to comment on the project, SPEN's route options and consultation process; and
  - Recording, considering and responding to all feedback, clearly demonstrating how it has influenced the outcome.

### Consultation zones

- 3.5.3 To make feedback easier, SPEN divided the project into three sections between the fixed connection points at Polquhanity, Kendoon substation, Glenlee substation and Tongland substation. These sections also reflect the way information is presented in the *KTR Project: Routeing and Consultation Document (October 2016)*, allowing documentation to be easily compared.

- 3.5.4 To ensure residents closest to the proposals were consulted directly, SPEN defined consultation zones in each section, which included all residential and business addresses within and close to the study area. These consultation zones were defined as an area generally extending to a kilometre either side of the study areas.
- 3.5.5 Where the consultation zone bisected the town of Kirkcudbright it was extended to include the entire town in order to ensure engagement was not divisive or inappropriate.
- 3.5.6 The consultation zones are shown in **Appendix K** and are described below, travelling from north to south:
- Zone A: From a connection point at Polquhanity to (and including) Kendoon substation;
  - Zone B: From Kendoon substation to (and including) Glenlee substation; and
  - Zone C: From Glenlee substation to (and including) Tongland substation.
- 3.5.7 The consultation zones were used to define areas for direct mailing of consultation literature and to make commenting easier. However, they were not restrictive or used to limit the numbers who could make comment. All members of the public were encouraged to participate in the consultation, attend exhibitions or make comments using one of the channels established for the purpose.

### The launch of consultation

- 3.5.8 SPEN's second round of consultation started on 31 October 2016 and ran for approximately eight weeks until 21 December 2016. Recognising the proximity of the Christmas holiday to the closing date, an additional 23 days was allowed after the end of formal consultation for people to send in their feedback. The deadline for feedback was set at 13 January 2017.
- 3.5.9 The subject of the second round of consultation was to gather people's opinions on:
- SPEN's preferred routes in each of the consultation zones;
  - Any of the alternative route options SPEN had considered during the appraisal process;
  - The removal of existing lines;
  - Any other issues, suggestions or feedback they would like SPEN to consider; and
  - The consultation process itself.
- 3.5.10 The official communications channels established during the first round of consultation were reused, due to their familiarity among existing stakeholders. These were used to answer queries and collect feedback. They were:
- A dedicated Freephone number **0800 157 7353**;
  - A dedicated project email address **dgsr@communityrelations.co.uk**; and
  - A Freepost address **FREEPOST SPEN DGSR**.
- 3.5.11 A wide range of materials was produced and circulated to launch and raise awareness of the project in advance and invite people to take part in the consultation. These are described below.

## Project leaflet

- 3.5.12 To help people provide informed feedback, a project leaflet was produced as a guide. 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 up to that point with regards to line routeing. The format was A4 which folded out to A1, revealing a summary map of the entire project plus detailed maps of each consultation zone and all the preferred and other routes SPEN considered. The leaflet also provided clear details of how to take part in the consultation, where to obtain more information and a full list of exhibitions and information points. A copy of the leaflet can be found in **Appendix F**.
- 3.5.13 The leaflet was posted in a clearly marked and branded envelope to all properties in postcodes inside the consultation zones on 19 October 2016. This mailing, in conjunction with other advertising and promotion, launched the second round of consultation and included around 3,500 residents and businesses. It was timed to be received a full week before the start of the consultation.
- 3.5.14 Leaflets were made available at public information points and on the consultation website. Further copies were also sent directly to all political, statutory and non-statutory stakeholders, as well as landowners, identified local groups and community organisations.

## Public exhibitions

- 3.5.15 A total of four public exhibitions were held at publicly accessible venues and locations at the start of the consultation. These comprised three exhibitions within the consultation area, plus one additional event in the county town of Dumfries. All were publicised and advertised at the launch of the consultation. The locations and dates of all the public exhibitions are detailed in Table 3.1 'List of public exhibitions'.

**Table 3.1 List of public exhibitions**

Dates and times	Location
November 1, 2pm until 8pm	Cairndale Hotel, Dumfries
November 2, 2pm until 8pm	Parish Church Hall, Kirkcudbright
November 3, 2pm until 8pm	Mossdale Village Hall
November 4, 2pm until 8pm	New Galloway Town Hall

- 3.5.16 The four public exhibitions ran from 1 to 4 November 2016 and were widely publicised through the project website, project leaflet, local newspaper advertising and publicity, posters sent to local community venues and letters sent directly to stakeholders.
- 3.5.17 At the public exhibitions, 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. Visuals of the banners used at the exhibitions are contained in **Appendix L**.

- 3.5.18 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). Several electronic tablets were also made available for people to input feedback on the day.
- 3.5.19 Despite the natural limitations of rural venues, the SPEN team were briefed and made allowances for differently-abled visitors as much as possible. This included raising awareness and sensitivity to people's individual needs among the project team, making large print versions of the project leaflet available and setting aside quiet areas for people with hearing difficulties. A hearing loop was hired for the event in New Galloway due to the high levels of background noise anticipated at that relatively smaller venue.
- 3.5.20 A number of USB memory devices were also made available on request for people who expressed difficulty viewing documents online and who could not easily reach an information point.
- 3.5.21 A 3D computer visualisation giving a representation of what the line may look like in the landscape helped people gain an understanding of the likely scale and visibility of the line from key viewpoints. However, it was made clear that the line route shown was only an indication showing the centre line of the preferred route, and that no decision as to route or tower locations had been made.
- 3.5.22 The 3D model was played as a fly-through on a continuous loop. In addition, two further copies of the model operated by trained technicians were available allowing people to interrogate the visual data in order to view the line from a number of locations, such as favoured viewpoints or their own properties.
- 3.5.23 The computer operators were among a range of experts fielded by SPEN 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 10 individuals depending on the location of the exhibition and the anticipated level of interest.
- 3.5.24 SPEN ensured the consultation team contained individuals with specialist expertise in key areas including planning, environment, health, construction and the consultation process to help ensure as many people as possible received comprehensive answers to their questions.
- 3.5.25 Although people were encouraged to ask questions and share their views with the team, attendees at exhibitions were advised to submit their formal responses via the official consultation channels, or using the available printed and electronic forms. This was to help avoid misinterpretation and errors in recording feedback second-hand, particularly during busy periods. It also maximised the potential for gathering monitoring information about respondents which is useful in identifying improvements to subsequent rounds of consultation.

### Feedback form

- 3.5.26 A feedback form was developed for stakeholders and the public to provide their comments and formally register their views as part of the second round of consultation. The feedback form asked for opinions and information on the KTR Project. Specific questions were asked on the preferred and alternative routes, the proposed work at substations and the consultation process itself. The feedback form also requested any other comments anyone wished to make. Copies of the feedback form can be found in **Appendix G**.
- 3.5.27 The form included a combination of six open questions and one closed question with space for respondents to communicate views or comments in free text. The form also requested monitoring data including respondents' names, addresses and ages.
- 3.5.28 A digital version of the feedback form was also developed for the website and for use on electronic tablets at exhibitions.

### Project website

- 3.5.29 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 listed in paragraph 3.5.6. Key project documents from current and previous rounds of consultation are available for downloading, together with lists of exhibitions and information points, printable maps and a printable feedback form.
- 3.5.30 The website also allowed for online consultation and included a dedicated area where visitors could complete and submit the second round consultation feedback forms. As part of the 'Contact us' section, people are also invited to be added to a distribution list for project updates.
- 3.5.31 The website was regularly updated throughout the second round of consultation to reflect project updates, such as the close of the consultation, and is continually updated as the project progresses.
- 3.5.32 During the second round of consultation, from the announcement of the consultation in the week commencing 17 October 2016 until 22 December 2016, the day after it closed, the website received approximately 1,226 visits. An additional 321 visits occurred following the close of consultation until the deadline for feedback on 13 January 2017.

### Media relations

- 3.5.33 To coincide with the launch of the second round of consultation, a press release was issued to the local media in the project area on 17 October 2016. See **Appendix M** for a copy of the launch press release and a full list of media outlets that received it.

3.5.34 A further press release was issued to the same media outlets on 19 December 2016 to announce the close of the consultation and remind people of the deadline for feedback. See **Appendix N** for a copy of this press release and a list of the media outlets that received it.

### Advertising and other promotion

3.5.35 In promoting the second round of consultation, SPEN placed quarter-page advertisements in the public notices sections of four local newspapers which appeared in editions dated 20 and 21 October 2016. These publication dates were more than a week in advance of the first public exhibition. The newspapers' combined circulation areas covered all consultation zones. See **Appendix O** for copies of the adverts, newspapers and circulation figures.

3.5.36 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 might do so and a statement that comments made to SPEN were not representations to the planning authority.

3.5.37 A5 posters advertising the exhibition times and locations were printed and circulated to 38 community, public and business venues within the consultation zones. The ten community councils directly affected by the project were also each sent five copies of the poster for circulation in their areas, including on notice boards. See **Appendix P** for a copy of the poster, a list of outlets to which it was sent and a sample of one of the accompanying letters.

3.5.38 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 3.2**.

**Figure 3.2 A-board used outside KTR Project exhibitions**



## Inspection copies

3.5.39 Clearly marked project information reference folders were made available to view free of charge from 21 October 2016 and are shown in **Figure 3.3**.

**Figure 3.3 Project information reference folders**



3.5.40 The folders were placed at the locations listed in Table 3.4 'Locations of public information points'.

**Table 3.4 Locations of public information points**

Dalry Library
Kirkcudbright Library
Dumfries Ewart Library
Dumfries Planning Office

- 3.5.41 Each folder included an explanatory covering letter and inspection copies of the following key consultation documents:
- Project leaflet and map;
  - KTR Project: Routeing and Consultation Document (October 2016);
  - Summary of Feedback from 2015 Consultation, which remains relevant to a revised scheme;
  - Appendices to the summary of feedback;
  - Dumfries and Galloway Strategic Reinforcement Project Conclusions Report, Executive Summary; and
  - Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment.

Copies of all key project documents in the folders were also available on a USB memory device free of charge on request.

### Close of the second round of consultation

- 3.5.42 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 second round of consultation. Chapter 6 summarises the feedback from members of the public. **Appendices A to E** summarise the feedback from other stakeholder groups.
- 3.5.43 The second round of consultation closed on 21 December 2016, but feedback was allowed until 13 January 2017. A further seven days after this date was allowed for the receipt of postal responses.

## 3.6 Who SPEN consulted

- 3.6.1 This section describes the various groups of stakeholders that SPEN consulted during its second round of consultation. For a list of organisations in each group see **Appendix R**. An example of one of the letters sent to stakeholders at the time of the launch of consultation is in **Appendix Q**.

### The local authority

- 3.6.2 The KTR Project falls entirely within the area of Dumfries & Galloway Council. As a local authority, the council is a statutory stakeholder and a member of the project's Statutory Stakeholder Liaison Group.
- 3.6.3 Consultation and discussions with Dumfries & Galloway Council has been extensive, regular and is ongoing. This includes meetings held with officers and elected members.

- 3.6.4 Prior to the start of consultation, SPEN offered a briefing for all ward local councillors, which took place on 10 October 2016 at the council chamber in Kirkbank, English Street, Dumfries. Nine councillors attended this briefing.
- 3.6.5 SPEN also sent the council, as the planning authority, a copy of the *KTR Project: Routeing and Consultation Document (October 2016)*, to add to its existing suite of documents about the project.
- 3.6.6 In line with the launch of the project, local authority members whose constituencies are in one of the consultation zones were sent information about the project by post. This included copies of the project leaflet and an invitation to attend the public exhibitions.

### Other statutory consultees

- 3.6.7 A number of other statutory consultees in relation to the project are also members of the project's Statutory Stakeholder Liaison Group (SSLG) as explained in section 3.3. SPEN has been in regular contact with statutory consultees throughout the development of the project and this continued through the second round of consultation.
- 3.6.8 Table 3.5 'Meetings with statutory consultees' provides a list of briefings held with statutory consultees during this round of consultation.

**Table 3.5 Meetings with statutory consultees**

Date and location	Body
27 July 2016, Dumfries	Statutory Stakeholder Liaison Group
9 August 2016, Dumfries	Statutory Stakeholder Liaison Group
9 August 2016, Dumfries	Scottish Natural Heritage
9 August 2016, Dumfries	Forestry Commission Scotland
11 August 2016, Dumfries	Forestry Commission Scotland (Conservator for South West Scotland)
18 January 2017, Dumfries	Dumfries & Galloway Council

- 3.6.9 In line with the launch of the project, statutory consultees were sent copies of the *KTR Project: Routeing and Consultation Document (October 2016)*, to add to their existing suites of documents about the project.

### Community councils

- 3.6.10 Community councils are also statutory consultees. At the point of the project launch, SPEN sent information about the project to the ten community councils in the consultation zones by post. This included the project leaflet, printed copies of the *KTR Project: Routeing and Consultation Document (October 2016)* and invitations for community councillors to attend one of the public exhibitions. A full list of all the community councils contacted is included in **Appendix R**.

- 3.6.11 As the second round of consultation progressed, SPEN engaged with several community councillors who directly contacted SPEN, submitted feedback or spoke to a project team member at an exhibition.
- 3.6.12 All ten affected community councils were also invited to join a new Community Liaison Group (CLG), which met for the first time on 14 November 2016 to discuss the proposals, please see paragraph 3.6.13.

### Community Liaison Group

- 3.6.13 To coincide with the launch of the second round of consultation, a new Community Liaison Group (CLG) was established. Chaired by the Scottish Government, the CLG was established to provide a forum for community representatives, SPEN and the Scottish Government to discuss local issues and concerns relating to the KTR Project. For the CLG's Terms of Reference please see **Appendix S**.
- 3.6.14 The CLG ensures that there is an open and constructive approach to identifying and discussing these issues and that these are fully considered in the development of the KTR Project. The CLG will sit during the pre-application phase and, once applications for consent are submitted, through the decision making process. In the event that section 37 consents are granted by Scottish Ministers, it is anticipated that the CLG would continue during the construction phase of the KTR Project.
- 3.6.15 Those invited by the Scottish Government to attend the CLG consist of:
- Scottish Government (Chair);
  - SPEN;
  - Dumfries & Galloway Council, including officials and elected members for the two affected wards of Dee and Castle Douglas & Glenkens;
  - Representatives from the ten directly affected community councils; and
  - Representatives from two local residents' groups.
- 3.6.16 It is proposed that the CLG will meet periodically as required throughout the lifetime of the project (through both the consent and construction processes) on a similar frequency to the established Statutory Stakeholder Liaison Group (SSLG).
- 3.6.17 From time to time it is expected that the membership of the CLG may vary. Subject to agreement of the CLG, the Chair may invite other individuals or groups to attend one or more meetings on issues or subjects where they have particular interest or expertise.

3.6.18 The first meeting of the CLG took place at Mossdale Village Hall on Monday 14 November 2016 and was attended by:

- Scottish Government;
- SPEN and its environmental consultants;
- Balmaclellan Community Council;
- Carsphairn Community Council;
- Dalry Community Council;
- The Royal Burgh of New Galloway and Kells Parish Community Council;
- Tongland and Ringford Community Council;
- Twynholm Community Council;
- Mossdale Community Group; and
- Kendoon Village Residents Association.

### Landowners

3.6.19 SPEN identified 106 landowners who own land within the area of its preferred routes. The area referred to is a strip of land 200m wide. Owners were identified via a title deed search at the Land Registry.

3.6.20 SPEN wrote to all these landowners in advance of the pre-consultation publicity in order to make them aware of the proposals and of the potential for the proposals to directly affect land owned by them. SPEN encouraged individual landowners to attend one of the public exhibitions to discuss the proposals with SPEN staff and, in addition, offered individual face-to-face meetings with each landowner.

3.6.21 Over the course of the consultation period, SPEN held 11 individual meetings with landowners and or their representatives. A shared record of the issues raised with or by individual landowners (including any subsequent actions on SPEN) was produced following each meeting. These notes were logged in the consultation register.

3.6.22 For reasons of privacy and commercial confidentiality the details of these meetings and discussions are not included in this report. However, SPEN also encouraged each landowner to submit their own responses via the official feedback channels in order to capture their views in the respondents' own words. Such feedback is included in the summaries in Chapter 6.

### Non-statutory consultees

3.6.23 In line with the launch of the second round of consultation, SPEN sent 13 non-statutory consultees, who were identified by the Scottish Government, information about the project including copies on USB of all the key project consultation documents outlined in paragraph 3.5.41.

3.6.24 A further 31 non-statutory consultees were sent information about the project by letter or 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 R**.

- 3.6.25 As the second round of consultation progressed, SPEN conducted briefings with a number of non-statutory consultees on request. See Table 3.7 'Meetings with non-statutory consultees' for details. SPEN remains in contact with these organisations.

**Table 3.7 Meetings with non-statutory consultees**

<b>Date and location</b>	<b>Body</b>
9 August 2016, Dumfries	Royal Society for the Protection of Birds (Scotland)
30 August 2016, Castle Douglas	Forest Enterprise Scotland
20 December 2016, Cumbernauld	Forest Enterprise Scotland
8 February 2017, Mossdale	Forest Enterprise Scotland

### Local interest organisation and groups

- 3.6.26 In line with the launch of the second round of consultation, SPEN sent information about the project by letter or email to 22 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 R**.
- 3.6.27 As the second round of consultation progressed, SPEN conducted briefings with a number of local interest organisations and groups on request. See Table 3.8 'Meetings with other organisations, held at their request' for details. SPEN remains in contact with these organisations.

**Table 3.8 Meetings with other organisations, held at their request**

<b>Date and location</b>	<b>Body</b>
18 November 2016, Glasgow	Dumfries and Galloway Developer Forum
8 December 2016, Kendoon	Kendoon Village Residents Association (also a member of the CLG, see paragraph 3.6.15)
18 January 2017, Dumfries	Galloway Glens Partnership

- 3.6.28 Other interest organisations or groups which became known after the launch of the consultation have been added to the project's stakeholder database for engagement in future rounds of consultation.

### Local Member of Parliament (MP) and Members of the Scottish Parliament (MSPs)

- 3.6.29 Letters or emails including project information were sent to the MP and eight MSPs whose constituencies were affected by the consultation zones, plus one additional MSP who asked to be kept informed. They can be found in the list of stakeholders consulted as included in **Appendix R**.

### **Local communities and members of the public**

- 3.6.30 People living within the consultation zones were communicated with directly about the launch of the second round of consultation. Around 3,500 homes and businesses, whose addresses were identified using postcode mapping, received a copy of the project leaflet. As outlined in paragraphs 3.5.12 to 3.5.14, 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.
- 3.6.31 The wider general population in Dumfries and Galloway was informed about the consultation using advertisements in the public notices sections of local newspapers, as described in paragraphs 3.5.35 and 3.5.36, as well as using press releases which resulted in a number of press and broadcast news items.
- 3.6.32 In advance of the consultation launch, SPEN also contacted two secondary schools and three primary schools covering the consultation area and invited them to take part. Schools were encouraged to arrange for pupils to attend a local exhibition, or set up a tailored classroom visit by a professional member of the SPEN community relations team. This resulted in ten SC10 geography students from Dalry Secondary School visiting the exhibition in New Galloway. Other schools who expressed an interest in a visit from the KTR Project team after the close of consultation will be visited during 2017.

## 4 Process for managing responses

### 4.1 Mechanisms for feedback

4.1.1 Details of official contact phone numbers and addresses for the second round of consultation were included in all materials and can be found in paragraph 3.5.10. These gave people a number of ways to comment on the Kendoon to Tongland 132kV Reinforcement (KTR) Project including:

- Emails to the dedicated project email address;
- Completing the feedback forms;
- Letters submitted via the Freepost address; and
- In discussion with a member of the project team in person or by phone.

4.1.2 The feedback form (**Appendix G**) was available in printed and electronic form at the public exhibitions and could be completed immediately or returned later using the project Freepost address. The feedback forms could also be downloaded or completed and submitted online on the project website [www.spendgsr.co.uk](http://www.spendgsr.co.uk).

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

- Preferred routes;
- Any of the alternative routes SPEN considered;
- The proposed work at substations, including the extension to Glenlee substation;
- The consultation process itself; and
- Any other issues.

4.1.4 Due to the considerable variation in the volume and detail contained in individual responses, there is a need for clear presentation and ease of reference.

4.1.5 For the purpose of this feedback report, comments from members of the public have been summarised in **Chapter 6**, together with SPEN's responses to these. Detailed summaries of issues from and SPEN's responses to other stakeholders are presented according to stakeholder group in **Appendices A to E**.

### 4.2 Processing responses and correspondence

4.2.1 Responses to the second 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 means, including 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 the different 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 and relevant planning authorities.
- 4.2.3 SPEN received a 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 given by the respondent, their contact details were recorded and added to the communication database for the project.

#### **Assessment procedure**

- 4.2.7 All items of feedback were individually assessed to establish whether the correspondent needed additional specific information in order to further develop their response. Where specifically requested in this way, 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 a database ready for analysis.
- 4.2.9 Email submissions were filed and entered into the same database.
- 4.2.10 Verbal and phone submissions were recorded on paper forms and entered onto the same database.
- 4.2.11 Online feedback forms were exported from the website and imported into the database. There were no responses submitted via electronic tablet at exhibitions.
- 4.2.12 SPEN will continue to review comments in the context of the development of the KTR Project at each stage.

## 4.3 Approach to analysis

- 4.3.1 SPEN's approach was to analyse response data and report it in a way that enabled the issues raised to be easily understood.
- 4.3.2 Key themes identified during the first round of consultation were used as the starting point for the analysis, and are shown in Table 4.1 'Themes for recording responses to the second round of consultation'.

**Table 4.1 Themes for recording responses to the second round of consultation**

<b>Need and overall approach</b>	
National and local policy	Comments on national or regional policy issues, including energy generation
The case for the project	Comments on need, condition of assets, capacity and connectivity
Strategic options	Comments on strategic options, how they were identified and SPEN's conclusions  Concern about the project leading to more wind farms
Undergrounding incl. Loch Ken	Comments on undergrounding, opposition to overhead lines, reasons for undergrounding/overhead including the pros/cons  Comments relating to putting the line under Loch Ken
Corridor selection and matters already concluded	Comments about earlier phases of methodology, relating to matters already considered during the first round of consultation
Cost	Comments regarding cost and how the project is funded
<b>Routeing</b>	
Routeing methodology, current phase	Comments about the routeing methodology as applied in this phase
Environmental impacts	Comments about the natural and historic environment, including habitats and designated sites
Landscape and amenity	Comments about effects on visual amenity including associated effects on recreation and tourism  Cumulative effects in relation to other overhead lines and wind farms etc.
Socio-economic impacts	Comments about potential impacts on local economic activity such as tourism, and effect on house values  Other human factors such as stress  Plans for development along the route

Health, safety and security	<p>Comments on health and physical safety (e.g. accident risk, noise, light and EMFs)</p> <p>Low fly zones</p>
Engineering, design and construction	<p>Comments about the viability of different and emerging technology options, infrastructure, alternative pylon design etc.</p> <p>Comments about local network technicalities, including resilience and connections to renewable sources, current and future</p> <p>Comments about the construction process, including potential effects of traffic and transport, impacts and access to land</p> <p>Comments on carbon emissions linked to the erection and removal of infrastructure, recycling of materials</p> <p>Comments about land suitability, including current and proposed land use, areas used for recreation, water supply, flooding etc.</p>
Line removal	Comments on the removal of existing lines
<b>Preferred routes by Zone</b>	
Route options	Comments on routes, including SPEN's preferred routes, modifications to SPEN's preferred routes, any of the alternative routes SPEN considered and suggestions for new routes not considered by SPEN
Suggested route alignments tower locations or access roads	<p>Comments about possible route alignments, tower locations or access roads</p> <p>Comments highlighting environmental and technical factors which are due to be considered by SPEN during the Environment Impact Assessment (EIA) stage</p>
Named local features, wildlife, views, development, to be taken into consideration	Any comments relating to or highlighting specific features or concerns within the local area
<b>Consultation process</b>	
Strategy and delivery	<p>Comments on the consultation process and materials, current and future</p> <p>Requests for more information about the project</p>

4.3.3 During detailed analysis further sub-themes, or issues, emerged which enabled SPEN to understand the broader context of the responses.

- 4.3.4 Every individual comment, query or concern within a single piece of feedback was identified and considered by the SPEN analysts. Each was then allocated to an existing or new issue and its unique identification number recorded against that issue.
- 4.3.5 This approach made analysis efficient, enabling the identification of high-frequency issues (those attracting the highest number of responses), further data interrogation and back-checking.

## 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 oversee the analysis to ensure consistent application of the methodology. The emerging issues were regularly reviewed throughout the analysis period with specialist input from SPEN's project team.

## 5 Overview of feedback received in the second 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 second round of consultation, respondents were asked to comment on the following:

- Preferred routes;
- Alternative routes;
- Proposed work at substations;
- The consultation process; and
- Any other issues.

5.1.3 Four exhibitions were held from 1 to 4 November 2016. A total of 186 visits were recorded at these public consultation events. **Appendix T** details the number of attendees at each consultation event.

5.1.4 A total of 107 items of feedback were recorded through different response mechanisms. Items are broken down into stakeholder groups in Table 5.1 'Numbers of response items by stakeholder group' and further explained in section 5.2. NB. Some items included responses from more than one stakeholder, for instance reports of formal meetings with stakeholders. Some stakeholders sent in more than one item.

**Table 5.1 Numbers of response items by stakeholder group**

Stakeholder type	Number of items
Public	77
Statutory	7
Non-statutory	9
Elected representatives	4 (includes comments recorded at councillor briefing)
Community councils	3 (includes comments recorded at a meeting of the Community Liaison Group (CLG))
Interest groups	7

5.1.5 The Mossdale Community Group attended the CLG and also submitted feedback using a detailed letter template, several copies of which were sent in by individual members of the group. Each letter has been assessed separately and any differences in comments recorded and considered.

5.1.6 Table 5.2 'Items received between 31 October 2016 and 20 January 2017' identifies the number of items received through the different response mechanisms. Items recorded as 'other' included notes of meetings and comments received verbally.

**Table 5.2 Items received between 31 October 2016 and 20 January 2017**

<b>Item type</b>	<b>Number received</b>
Hard copy feedback forms	32
Online feedback forms	12
Emails	37
Letters	14
Other	12

## 5.2 Responses by stakeholder group

5.2.1 A total of 33 statutory and non-statutory consultees, local interest groups and elected representatives made representations either individually or jointly during the second round of consultation.

5.2.2 Responses were received from the following stakeholders:

### Statutory consultees:

- Dumfries & Galloway Council
- Forestry Commission (Scotland)
- Historic Environment Scotland
- Scottish Environment Protection Agency
- Scottish Natural Heritage

### Non-statutory consultees:

- Coal Authority
- Galloway Fisheries Trust
- Joint Nature Conservation Committee
- Marine Scotland Science
- Royal Society for the Protection of Birds (Scotland)
- Scotland Gas Networks
- Scottish Water
- Transport Scotland
- West of Scotland Archaeology Service

### Community councils:

Italics indicate where a council's response was recorded at a meeting of the Community Liaison group.

- *Balmaclellan Community Council*
- Balmaghie Community Council
- *Carsphairn Community Council*
- Royal Burgh of New Galloway and Kells Community Council

#### Other local interest groups and organisations:

- Dumgal Against Pylons
- Galloway National Park Association
- Galloway and Southern Ayrshire Biosphere
- Gatehouse and Kirkcudbright Angling Association
- Kendoon Village Residents Association
- Laurieston Hall Housing Co-operative
- Mossdale Community Group

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

Italics indicate where a response was recorded at a briefing meeting organised by SPEN at Dumfries & Galloway Council:

- Richard Arkless MP
- *Councillor Ian Carruthers*
- Finlay Carson MSP and councillor
- *Councillor Patsy Gilroy*
- *Councillor Tom McAughtrie*
- *Councillor David McKie*
- *Councillor George Prentice*

## 5.3 Presentation of responses

5.3.1 Feedback from all respondents to the second round of consultation has been considered in full by the SPEN project team. Although it is not possible to list every single comment in this report, all comments have been faithfully recorded as summarised issues. The process of summarising the feedback is described in Chapter 4.

5.3.2 From the 77 consultation responses received from members of the public, a total of 130 separate issues were recorded.

5.3.3 Summaries of the issues and SPEN's responses to them are outlined in Chapter 6 under the following four broad headings:

- The need for and approach to the project;
- The routeing methodology;
- Preferred routes; and
- The consultation process.

- 5.3.4 Summaries of the issues from other stakeholders, such as statutory and non-statutory consultees, elected representatives, community councils and other interest groups, SPEN's responses to them and whether they have influenced the development of the project are recorded in **Appendices A to E**, as follows:
- **Appendix A** shows summaries of responses from individual statutory consultees;
  - **Appendix B** shows summaries of responses from individual non-statutory consultees;
  - **Appendix C** shows summaries of feedback from individual elected members;
  - **Appendix D** shows summaries of feedback from community councils; and
  - **Appendix E** shows summaries of responses from local interest groups, bodies and organisations.

## 5.4 Comments received following the close of consultation

- 5.4.1 The second round of consultation was held between 31 October 2016 and 21 December 2016, with the deadline for receipt of feedback set at 13 January 2017. SPEN allowed an additional week until 20 January 2017 for the arrival of postal feedback. Representations received after 20 January 2017 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 20 January 2017 as part of its wider consideration and analysis of consultation feedback. This included some items from statutory and non-statutory organisations whose later submission date had been agreed with the project team. Because of the very small number of items, these and all responses received up until the middle of February have been included in this report.
- 5.4.3 Consultation feedback received from members of the public after 20 January 2017 raised matters/themes which were consistent with consultation feedback already received during the formal consultation period. They included four template letters from members of the Mossdale Community Group and a further hard copy feedback form. These items and their comments have been included in the data and summaries in this report.
- 5.4.4 Items received following the publication of this report will be considered as part of the ongoing development of the KTR Project.

## 6 Key issues raised by members of the public in the second round

### 6.1 Overview

- 6.1.1 The vast majority of respondents commented on specific aspects of the Kendoon to Tongland 132kV Reinforcement (KTR) Project, and the issues they raised are captured in the summaries in this chapter. However, there were a relatively small number of comments expressing a generalised opposition or support.
- 6.1.2 For those opposing the project, the reasons quoted were a general concern over its potential visual impact; a belief it was not required; or a suspicion that it is being done for the convenience of, or would encourage more, wind farms.
- 6.1.3 The similar number of people who expressed support did so on the basis that they accepted the need or felt that revising or reducing the scheme since the first round of consultation had made it more acceptable to them.
- 6.1.4 These and other comments received have been summarised and grouped according to the following broad themes:
- Comments relating to the need for and approach to the project;
  - Comments relating to the routeing methodology;
  - Comments relating to preferred routes; and
  - Comments relating to the consultation process.

### 6.2 Comments relating to the need for and approach to the project

- 6.2.1 The following sub-themes emerged in the comments received from the feedback:
- Energy policy;
  - The case for the KTR Project;
  - Impact on local supplies;
  - Undergrounding; and
  - The choice of corridor/study area.
- 6.2.2 SPEN has considered the comments and responded to them below.

#### Energy policy

##### Summary of comments received

- 6.2.3 There were several comments about the energy situation generally and how it influenced the project and possible future developments in Dumfries and Galloway. This included a general concern that the ever increasing need for electricity would bring increased future pressure to the region's landscape.
- 6.2.4 One person queried whether the power line would become a means to carry electricity across the border to England and beyond.

6.2.5 There were questions about whether the new line would bring potential benefits or have constraints for renewable projects such as wind farms in the area.

6.2.6 There was a specific reference to whether it would have the capacity to provide connections for smaller scale renewable schemes such as run of river hydro, or small scale wind in the Mossdale area.

#### SPEN's response

6.2.7 The proposed scheme will allow access to the transmission system regardless of size or location of generation in the area. The transmission system in Scotland is the network of 132kV and above. SPEN has a license obligation to provide the infrastructure to connect renewable generation in the most economical and efficient way. The new scheme will provide a route from Galloway to the wider system near Kilmarnock and existing (and new HVDC) infrastructure will carry the power to England.

6.2.8 The existing system can securely connect around 85 megawatts (MW) of generation from the area around Glenluce, Newton Stewart and Tongland. The new system will increase the exporting capability of the system in this area to around 334MW. This will allow connections of both small scale embedded and large generation to the system.

6.2.9 With regards to smaller scale embedded generation connecting to the local distribution network in the area, an existing single-phase supply could accommodate up to 3.68 kilowatts (kW) and a three-phase supply up to 11.04kW without the need for any further reinforcements. This type of generation will require what is termed a G83 connection. Generators greater than 11kW will require a G59 connection and these are assessed on case-by-case basis.

6.2.10 More information on the type of and process for generator connection on the distribution system is available at:  
[http://www.spenergynetworks.co.uk/pages/distributed\\_generation.asp](http://www.spenergynetworks.co.uk/pages/distributed_generation.asp).

### **The case for the KTR Project**

#### Summary of comments received

6.2.11 Several respondents accepted the need to upgrade, replace or renew the current line, although some did not. Two expressed doubt over the urgency of the work, suggesting that more information should have been provided about the remaining lifespan of the current line.

#### SPEN's response

6.2.12 Overhead electricity lines have a typical lifespan of around 40 years but this can be extended by refurbishment to replace tower fixtures and fittings like insulators and conductors etc. and also through structural maintenance of the tower steelwork and foundations. However, these lines cannot be maintained indefinitely.

- 6.2.13 Although the network is inspected every year to ensure public safety and is regularly maintained, a more in-depth assessment of the health and condition of our assets and the performance and criticality of our circuits shows that replacement needs to be carried out soon. We carry out a detailed assessment of all the assets on our network on a regular basis, taking into account component condition, the structural design parameters and criticality as well as age. Circuit performance is also considered so that we can identify necessary improvements to our existing infrastructure to ensure that the transmission network continues to deliver the reliability, security and performance levels demanded.

### **Impact on local supplies**

#### Summary of comments received

- 6.2.14 Respondents asked whether the new line would improve current local supply issues or affect the number of planned interruptions, and what the implications would be for SPEN's lower voltage distribution network generally.

#### SPEN's response

- 6.2.15 The KTR Project will provide a secure and reliable transmission network to the area. The transmission system in the UK is one of the most resilient in the world and annual performance reports are published by the system operator. These can be found at: <http://www2.nationalgrid.com/UK/Industry-information/Electricity-transmission-operational-data/Report-explorer/Performance-Reports/>.
- 6.2.16 Separate to this, SPEN's distribution business is currently investing heavily to improve resilience and security of supply in the area's local distribution network. These improvements will help improve security of supply to the local area.
- 6.2.17 If the project receives consent, we may need some temporary outages on the distribution network. For example, in areas where the new tower line will cross existing distribution overhead lines there will be a requirement to place the lower voltage lines underground on either a temporary or permanent basis. This will help create safe working conditions for the contractor teams carrying out construction.

### **Undergrounding**

#### Summary of comments received

- 6.2.18 Although there was some acceptance that undergrounding could be impractical due to ground conditions in places, there was considerable support for undergrounding all or part of the line to reduce its visual and environmental impact for the benefit of residents and tourists. Several people referred to the area's unspoilt nature, such as views and habitats, as an important factor in an ambition to maintain and enhance its reputation as a tourist area. The majority of people who commented in favour of undergrounding referred specifically to Zone C, or areas within it. Several specific places along the preferred routes were identified where respondents believed putting the line underground would be most beneficial. These are listed among the comments relating to specific Zones in section 6.4.

- 6.2.19 There was a view that undergrounding feasibility and costing should be considered earlier in a project's development and that this view was supported by experts, who were unspecified. Evidence included National Grid's recent agreement to underground 23.4km of new high voltage overhead line in the Lake District following pressure from communities and the fact that existing overhead lines have been retrospectively put underground for the benefit of landscape.
- 6.2.20 There was a statement that SPEN had not adequately explained its position on undergrounding and should review its policy.
- 6.2.21 There was a comment that cost was not an acceptable argument against undergrounding and that the Scottish Government should require power companies to fund the cost of undergrounding intrusive lines out of their profits.

SPEN's response

- 6.2.22 We take our responsibilities to the public and the environment seriously. We adopt a proactive approach, balancing environmental considerations with the need to remain competitive and to provide services at a cost that customers can afford.
- 6.2.23 High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electrical infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined that an underground cable section is required then the approach is to minimise the length of underground cable necessary to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations.
- 6.2.24 Our overall approach is based on the premise that the major effect of an overhead line is visual due to its relative scale to objects in the vicinity such as buildings and trees. There is no technical way of reducing this other than choice of towers, and only limited ways of achieving screening through planting. The most effective way of causing the least visual disturbance is by careful routeing.
- 6.2.25 An underground cable has different technical requirements and environmental considerations than an overhead line. For example, an underground cable will have less visual impact than an overhead line but may have greater impact on ecological habitats, species and on archaeological remains, given the level of ground disturbance. For these reasons, the route for an underground cable may be different from that of an overhead line.
- 6.2.26 Our *Schedule 9 Statement* sets out how we will meet the environmental duties placed upon us and can be found in **Appendix H**. The statement also refers to the application of best practice methods to assess the environmental impacts of proposals and to identify appropriate mitigation measures. Adherence to our Schedule 9 duties is reflected in our approach to routeing which takes into account landscape, visual, environmental, economic and technical factors to route and design a project which causes, on balance, the least disturbance to people and the environment. You can find out more about this by referring to our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*. Our *Routeing and Consultation Document (October 2016)* explains how we have followed this approach in identifying our preferred routes for this project.

- 6.2.27 Our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* explains the process we go through to identify and appraise potential areas for overhead lines and the stage at which we might consider an underground alternative, and reflects our adherence to Schedule 9 duties. We are not yet at that stage of considering an actual route or making detailed decisions on construction. Further assessments and consultations will help us identify if there are any sections where undergrounding should be the preferred option.
- 6.2.28 The development of suitable overhead line routes is part of an iterative and methodical process. If constraints emerged at a future stage of the process which made a particular section of overhead line route impossible, we would need to look anew at alternatives. This could include re-examining previously discounted areas because the routeing methodology for underground cables is different to that for an overhead line.
- 6.2.29 Where no suitable continuous overhead line option exists, SPEN will make a clear and transparent decision on the undergrounding of a section of line. This will take into account feedback from consultation with stakeholders and the public in relation to the protection of a particular resource, in terms of the benefits or drawbacks of underground cable as an alternative to an overhead line. This decision will take into account the environmental benefit that could be achieved through undergrounding, without incurring excessive cost, and the effects of the technical issues associated with undergrounding on the overall reliability and availability of the connection. Consistent with SPEN's statutory and licence duties, the capital and maintenance costs would be taken into account. Impacts on the deliverability of the project would also be considered. Further information on issues which might trigger consideration of undergrounding can be found in chapter 6.5 of our *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* document at [www.spendgsr.co.uk](http://www.spendgsr.co.uk).
- 6.2.30 In relation to cost, undergrounding is generally significantly more expensive than building overhead lines, but varies considerably from project to project depending on a range of factors, including whether the line is buried in roads, directly in open agricultural land or whether more complex tunnelling and civil engineering is required. Repair impacts are also higher than for overhead lines as are the costs associated with any later uprating. Based on current market rates, the construction cost for 132kV (124MVA) single circuit underground cabling is estimated, depending on topology and geology, to be greater than three times the cost for a 132kV single circuit wood pole installation. The construction costs for 132kV (352MVA) double circuit underground cabling is estimated to be greater than four times the cost for a 132kV double circuit steel tower installation (as proposed on the KTR Project). The actual multiplier depends on many factors including, but not limited to, the following; circuit rating, circuit length, installation method, environmental issues, circuit cable lengths in comparison with circuit overhead line lengths, ground conditions and access requirements.
- 6.2.31 A proportion of everyone's electricity bill in the UK helps fund transmission infrastructure like the KTR Project. However, it's a relatively small part of the bill, approximately six per cent. This is regulated by Ofgem, who acts on behalf of consumers to ensure projects are delivered effectively, economically and efficiently.

- 6.2.32 The overall cost of the project will be shared by generators and consumers according to charging rules applied by National Grid in its role as GB System Operator, in line with the current industry framework. The cost of this and any other electricity infrastructure project is determined by current legislation and the regulatory framework. Further information on this can be found under the project Needs Case tab on the project website at [www.spendgsr.co.uk](http://www.spendgsr.co.uk).
- 6.2.33 In general terms, under our transmission licence we are responsible for raising the finance for the project through debt (which is borrowed at market interest rates) and equity from shareholders and thereafter recover the cost over a long term period from GB consumers through transmission use of system charges. We seek to raise finance efficiently, using a mix of debt and equity. Investors require a return on their investment to compensate them for the risks that they bear. Ofgem sets the allowed return on equity and the allowed cost of debt moves in line with the cost of debt index.

### Choice of corridor/study area (including Loch Ken)

#### Summary of comments received

- 6.2.34 A number of respondents felt the corridor running east of Loch Ken following the route of the existing 132kV line (identified as G/T 4 in the first round of consultation) should have been selected, instead of SPEN's preferred corridor G/T 2 for Zone C. This was based on a belief that following the route of the existing line adhered to the Holford Rules and would be less visually intrusive due to the fact people and the environment had grown accustomed to it during its 80-year existence.
- 6.2.35 One respondent felt a different corridor further west (identified as G/T 1 in the first round of consultation), which runs down the Fleet valley before heading south-east below Glengap Forest, would be preferable from a visual, amenity and environmental impact perspective due to being predominantly in isolated forestry, despite being longer.
- 6.2.36 There was a suggestion that SPEN had chosen its proposed corridor based on least cost for itself or ease of planning. However, some respondents felt a route following the existing line would be cheaper to build, due to being shorter, having established access points or because it would be less likely to be subject to a legal challenge.
- 6.2.37 Several comments suggested that undergrounding, or putting the short section of the electricity connection which crosses Loch Ken near Livingstone underneath rather than over the loch, could make a route which follows the existing line more or as acceptable from an environmental point of view as SPEN's new preferred route in Zone C.
- 6.2.38 A number of comments from members of the public suggested the new connection could be placed partially or entirely within or underneath Loch Ken. Other stakeholders also saw merit in this idea (see **Appendices A to E**).

## SPEN's response

- 6.2.39 Our approach to routeing corridors, which was the focus of our routeing and consultation work during 2015, was to adopt a 'blank sheet' approach e.g. not solely reflecting the route of existing 132kV overhead lines. This approach ensured that all potential corridors were identified and appraised, whilst acknowledging that potential corridors may follow/include existing overhead lines in places. It is important to note that a number of the corridor options we identified for the project included the routes of existing lines. All corridor options in a given area were subject to the same environmental and technical appraisal against each other and the presence of the existing line was taken into account at that time. The appraisal findings were presented within the corridor appraisal tables in the *Routeing and Consultation Document (May 2015)*, available at [www.spendgsr.co.uk](http://www.spendgsr.co.uk), and informed the selection of a preferred corridor.
- 6.2.40 Corridor G/T 1 was considered as part of the corridor appraisal in 2015. However, this corridor would have resulted in a longer route which would have also brought the overhead line in proximity to the Fleet Valley National Scenic Area (NSA), and the settlement of Gatehouse of Fleet. It also reduced potential line routeing opportunities close to the existing overhead line on the approach to Tongland substation, and would introduce the overhead line into the Tarff Valley. Variations on the same corridor are likely to result in similar findings in relation to the environment as well as affecting the SSSI located adjacent to the east of G/T 1.
- 6.2.41 The existing overhead line located within G/T 4 crosses over Loch Ken which is designated as an SSSI (Site of Specific Scientific Interest), SPA (Special Protection Areas) and Ramsar site. The Flooded Valley LCT (Landscape Character Type) around the Loch Ken area is also considered to be sensitive in landscape terms and the corridor has a higher density of residential properties, particularly around the loch edge, relative to the preferred corridor (G/T 2) which in its northern half passes through sparsely populated areas of coniferous woodland.
- 6.2.42 However, due to the feedback received from the public requesting that G/T 4 is revisited in relation to the identification of a route, SPEN has identified a route option which follows, wherever possible, the existing overhead line east of Loch Ken. Please see **Figure 6.1** for a map of this route. This route option has been subjected to an appraisal against the criteria applied to all the other route options as part of the 2016 routeing and consultation exercise. The findings of the appraisal of this route option are presented in **Appendix V**. The findings show that a route following the existing overhead line east of Loch Ken (in corridor G/T 4), would not perform better than SPEN's current preferred route for Zone C, due primarily to the potential impacts on the qualifying species of the Loch Ken and River Dee Marshes Ramsar, SPA and SSSI (designated for their ornithological interest), and potential visual amenity effects on properties and views (including recreation and tourism resources) in the Ken valley. Furthermore, routeing within corridor G/T 2 will enable SPEN to remove the existing overhead line within G/T 4. The removal would represent an improvement in relation to the aforementioned designated sites, and general landscape and visual amenity terms. The consultation responses from Scottish Natural Heritage (SNH), and Dumfries & Galloway Council confirm that they would view the removal as representing such an improvement (see **Appendix A**). On the basis of the findings of the appraisal, SPEN's current preferred route in Zone C (subject to modifications as set out later in this chapter), remains the preferred route to be progressed to the alignment and Environment Impact Assessment (EIA) stage.

- 6.2.43 When we design the network we balance economic, technical and environmental factors. As overhead line solutions are considerably lower cost than underground this will generally be the preferred approach, assuming technical and environmental factors can be accommodated. Based on current market rates, the construction costs for 132kV (352MVA) double circuit underground cabling is estimated to be greater than four times the cost for a 132kV double circuit steel tower installation (as proposed on the KTR Project).
- 6.2.44 Placing a cable within Loch Ken would have additional costs, over and above the cost of undergrounding. Further detailed study would be required to assess this fully, as it would depend on factors such as:
- A further environmental assessment for placing cable sealing end compounds on either side of Loch Ken;
  - Potential additional costs associated with the technical design of the underwater cable in terms of manufacturing and rating requirements;
  - Costs associated with securing spare underwater cable to facilitate fault repairs;
  - Installation method for placing cable in the water is likely to be via a specialised boat or barge. These vessels are limited in availability which would add to the cost;
  - Access and transport considerations would require a detailed transport plan to deliver the installation equipment to the loch which could cause disruption to the local community during transportation; and
  - Future maintenance and reliability. Any fault which occurs during the lifetime of the underwater cable would require the same installation equipment to be brought back to the loch to facilitate repair. A double circuit fault would have an extended repair time to restore supplies on the transmission network which could affect the supplies to around 13,000 customers in Tongland, Castle Douglas, Gatehouse and Dalbeattie.

## 6.3 Comments relating to routeing

- 6.3.1 The following sub-themes emerged in the comments received from the feedback:
- General;
  - Environmental impacts;
  - Landscape and amenity;
  - Socio-economic impacts;
  - Health, safety and security;
  - Engineering, design and construction; and
  - Line removal.
- 6.3.2 SPEN has considered the comments and responded to them below.

### General

#### Summary of comments received

- 6.3.3 Two features were pointed out that were not identified on SPEN's routeing documents, a property near Airie and a historical feature at Slogarie.

- 6.3.4 There was a general view that more specific information should have been given on the location of the line and towers.

SPEN's response

- 6.3.5 The process of identifying residential properties comprises desk-based research (Ordnance Survey (OS) data and aerial imagery) supplemented by verification in the field. There are limitations with the desk-based data provided by OS, the quality of aerial imagery and the fact that on-site access is restricted to publicly accessible locations, all of which make it challenging to identify with 100% certainty every property for a project in relatively remote areas. The property itself sits outside the preferred corridor which was defined at its western extent by the presence of the large designated area to the west (Laughengie and Airie Hill SSSI). Informed by the feedback received from the consultation phase and further site work, any properties not previously mapped have been added to the constraints mapping to inform the route alignment and Environmental Impact Assessment (EIA).
- 6.3.6 Cultural heritage features shown on the Dumfries & Galloway Council Historic Environment Records (HER) database as being 'unscheduled archaeology of national, regional and local importance' were mapped and informed the appraisal of route options. The feature at Slogarie appears within the HER database as being of 'other' importance and was therefore not mapped. All features, regardless of their HER importance, will be mapped and avoided where possible during the alignment stage and potential effects on these features will be included within the EIA.
- 6.3.7 At this stage in the process, we have identified route options approximately 200m in width, which meet the technical parameters, whilst wherever possible avoiding environmental constraints, including individual residential properties. The feedback received from this consultation, including the results of the technical ground surveys, environmental surveys and landowner discussions, will inform the selection of a route alignment (including tower and pole locations) which will be consulted on during a future round of consultation later in 2017.

**Environmental impacts**

Summary of comments received

- 6.3.8 There was support for using the line route to improve habitats for wildlife. Suggestions included under-planting the line with low-growing shrubs and installing drinking ponds for wildlife to use. Particular species felt likely to benefit from such an approach were nightjars and black grouse, which are both on the Red List of Threatened Species, and long-eared owls.
- 6.3.9 There was a suggestion that SPEN's routeing should take into account, and not detract from, the aspirations of the Galloway Glens Landscape Partnership, which is seeking funding to improve the scenic and amenity value of the upper Water of Ken.

### SPEN's response

- 6.3.10 Successful mitigation must address the direct and indirect effects that development of the project may give rise to. Whilst any mitigation might provide wider benefits to communities, habitat or biodiversity it should focus on the main impacts of transmission infrastructure, which are predominantly landscape and visual. In developing corridors of enhanced mitigation alongside the main project and by promoting green networks, landscape and visual amenity can be improved while communities can also benefit from green places, active travel networks, landscape planting, improved biodiversity or the provision of local paths and cycle ways (which provide opportunities for linear planting). Our experience of delivering this type of mitigation recognises that, in order to achieve the most effective results, such proposals are best developed in partnership with local communities, landowners and relevant agencies. We are keen to work in partnership with communities and groups, such as the Galloway Glens Landscape Partnership, to develop and progress such proposals in parallel with the project design.

### **Landscape and amenity**

#### Summary of comments received

- 6.3.11 Concern about reducing the visual impact was a key routeing theme. There were calls to place new higher towers below the horizon line of the hills to minimise visual impact.
- 6.3.12 There were a number of comments that SPEN should take account of the likelihood of this part of Dumfries and Galloway becoming a national park in the near future, possibly by the time the project is completed, and to safeguard this possibility by planning the route according to the likely restrictions this would impose.

### SPEN's response

- 6.3.13 National parks are considered 'areas of highest environmental value' within SPEN's routeing methodology. There are currently no national parks within the study area for the KTR Project and no candidate designation exists for this area or other potential future national parks in Scotland. Should a new national park be designated by the Scottish Government within the study area, prior to SPEN submitting the section 37 applications for consent, we will consider the implications of this for routeing the project. One of the overarching aims of the routeing methodology is to limit potential landscape and visual effects as set out in the routeing strategy for the KTR Project. Para 4.1-4.2 of the *Routeing and Consultation Document (October 2016)* states that: "*To limit visual effects of the proposed overhead lines, routes will seek to avoid high ground and ridgelines and generally follow valleys, responding to the grain of the landscape wherever possible, subject to avoiding areas of highest amenity value.*"

## Socio-economic impacts

### Summary of comments received

- 6.3.14 A number of respondents were concerned about the potential impact of the new line on tourism, which they considered an important industry for Dumfries and Galloway, due to the visual impact. There were comments that SPEN should take steps to mitigate and minimise any adverse impact on scenery through careful routeing.
- 6.3.15 Respondents highlighted a number of general areas of tourism interest which could be impaired or should be avoided when routeing the new line. These included:
- Galloway Forest Park;
  - Galloway Dark Sky Park;
  - Galloway and Southern Ayrshire Biosphere; and
  - Various specific scenic viewpoints, routes, drives, trails and walks with views over the preferred route both within and outside the study area. Please see the comments relating to Zones in section 6.4.
- 6.3.16 Several respondents mentioned concern for the impact on business and livelihoods in the area affected by the line, such as farming and fishing and the effect of traffic disruption.
- 6.3.17 There was a comment that SPEN will use compensation to satisfy current residents but that this does not ameliorate the impact on future generations.
- 6.3.18 There were generalised concerns that the presence of the line could affect property prices and home sales and a suggestion that the line should be routed away from all residential property.

### SPEN's response

- 6.3.19 Tourism, recreation and land use such as forestry and farming have been considered as part of the identification and appraisal of route options. This has included the tourist attractions and features which could be affected by visual impact, which statutory consultees, local interest groups and public informed us about through the consultation process in 2015. Subsequently we will be assessing the potential impacts on tourism as part of the Environmental Impact Assessment (EIA) of the final proposed route. Impacts on farming and fishing can largely be avoided through micro-siting of individual towers and poles and will be informed by discussions with landowners and local fishery groups as we consider route alignments at the next stage of the process.
- 6.3.20 Landowners who have apparatus placed on their land would be entitled to compensation. However, there is no compensation for the potential impact of the overhead lines forming part of the project on views from individual properties.

- 6.3.21 We recognise that the visual impact of an overhead line may be an issue for many local communities and individuals and our approach is to maximise the distance of the final route from properties wherever possible, including the principal views from properties. Individual properties have been mapped and considered as part of this stage of the routing process. However, as we move forward into consideration of detailed alignments and tower locations, in some cases the residential visual amenity impact on a property can be mitigated through micro-siting of individual towers, and we would seek to do this where possible.

### **Health, safety and security**

#### Summary of comments received

- 6.3.22 There were concerns about the perceived risks of electric and magnetic fields (EMFs). Some property owners living near existing lines within preferred routes expressed a desire the new line should be no nearer to their homes than it is currently.

#### SPEN's response

- 6.3.23 Both SP Transmission Plc's (SPT) existing and proposed infrastructure will comply with Government guidelines. For more information, please visit [www.emfs.info](http://www.emfs.info).

### **Engineering, design and construction**

#### Summary of comments received

- 6.3.24 A number of respondents made comments about the design of the towers being proposed. Suggestions included alternative means of supporting wires to reduce visual impact in key areas, for instance shorter towers or twin wooden poles, or the application of a coloured coating to reduce the visibility of steel latticework.
- 6.3.25 There were several queries about construction, in particular how access will be granted, when the work will be carried out and how long it is likely to take.
- 6.3.26 There were requests for information on how SPEN will manage the impacts of construction such as potential damage to local infrastructure, the effect of creating access or working within agricultural land, as well as dust and noise.
- 6.3.27 There were several comments about the management of additional construction traffic, the use of local roads for heavy vehicles, disruption to local journey times and the potential safety implications from drivers of heavy vehicles not experienced on small country roads. References to specific roads are captured by Zone in section 6.4.
- 6.3.28 Similar concerns were raised about the potential use of forest access roads close to private properties, due to narrowness and the presence of non-standard junctions causing an increased safety risk for personal journeys.
- 6.3.29 There was a request for information on how contamination of private water supplies along or close to the preferred routes would be avoided.

### SPEN's response

- 6.3.30 The types of steel lattice tower and conductors (wires) we use for transmission infrastructure projects are described in Chapter 4 of our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* which is available on our website. The towers are made from high tensile steel which is assembled using galvanised high tensile steel bolts with nuts and locking devices. We will continue to monitor, and contribute to, developments in the industry and make decisions on where new and appropriate designs might be utilised as part of the development of any major electrical infrastructure proposals. The tower designs we use will be GBSQSS (Great Britain Security and Quality of Supply Standard) compliant and are likely to be those already used across the existing transmission network.
- 6.3.31 Low height lattice steel towers, known as 'low profile' towers, have been used to reduce the vertical scale of 275kV and 400kV towers in relation to the underlying topography and other landscape features. As 132kV towers are significantly lower in height than 275kV and 400kV towers, there is no such design available for 132kV towers at present. However, depending on the type of conductor we use (i.e. a lighter conductor) and the underlying topography, there may be opportunities to reduce span lengths and tower heights while maintaining statutory safety clearance distances for 132kV towers.
- 6.3.32 SPEN's position, in line with nationally-recognised Electricity Networks Association Standards, is for any new connection requiring two circuits to be accommodated on steel towers. Towers installed under these standards have continuous earth wires in order to protect against faults caused by lightning strikes, to provide earth potential continuity between substations and incorporate communication and protection functions. Application of these established designs have historically ensured that SPEN's overhead lines are robust and fit for construction, operational and maintenance purposes and provide a reliable connection to the grid.
- 6.3.33 Any reconfiguration of the circuits would be a non-standard design e.g. a double circuit wood pole section between two sections of towers. Further investigation has identified the following concerns:
- A lower level of network reliability than with a continuous steel tower line;
  - Further sterilisation of land (a wider wayleave corridor would be required by introducing either a third wood pole to accommodate an earth wire or underground earth wire);
  - Increased costs associated with the installation and maintenance of a separate earth wire and the requirement to install, operate and maintain two separate overhead line routes; and
  - Asset renewal at different stages in the lifespan.

Taking into account the factors above, SPEN proposes to use a continuous steel tower design on the Kendoon to Glenlee and Glenlee to Tongland sections of the KTR Project.

- 6.3.34 Towers are generally painted grey. It is not possible to colour towers to camouflage them for all times of day or all seasons. However, the colour of towers can only be recognised from a short distance. Beyond this distance, the colour is not distinguishable and appears as grades of light and dark. Where towers are viewed against the sky, colour cannot be relied upon to diminish visibility, since the lighting characteristics of the sky vary greatly. Towers will turn a dull grey after about 18 months.
- 6.3.35 Some disruption will be inevitable in a project of this size, but it's too early to be precise until we have developed our final proposals. We aim to minimise any potential impact to residents, businesses and communities. Our Environmental Statement, which we will submit as part of our applications for section 37 consent, will include an outline Traffic Management Plan (TMP) developed with Transport Scotland, the local roads authorities and the police.
- 6.3.36 If the project obtains consent, a detailed TMP would need to be submitted to the local roads authority and this would include assessing the condition of any local roads to be used by construction traffic and the standard of reinstatement post-construction. In addition to this, and building on experience from previous projects, SPEN would investigate the possibility of establishing a traffic management forum which would consist of the local authority roads and planning teams and members of the local community in order to monitor the work and address any issues that may arise e.g. traffic management in a timely manner
- 6.3.37 To permit the construction, operation and maintenance of overhead lines, suitable rights over land (wayleaves, servitudes, easements) are needed from every landowner or other party holding a relevant interest in the land crossed by a proposed overhead line. In the first instance, we will seek to achieve a voluntary agreement to acquire the rights. In the event that this is not possible, consideration will be given to seeking a necessary wayleave from Scottish Ministers. In exceptional circumstances, consideration may be given to the use of powers of compulsory purchase to acquire land or rights over land.
- 6.3.38 In addition to installing overhead lines, we will also need to create access routes and temporary construction areas during the construction period. This may involve widening gateways, removal (and subsequent replacement) of hedges and fences, creation of temporary hard surfaces and the provision of temporary plain and stock proof fences. When negotiating these arrangements, due regard is made to minimising damage to landholders' interests. Following work, land would be reinstated and any damage made good by SPEN. Further information can be found in SPEN's Grantor's Charter at [www.spenergynetworks.co.uk/pages/wayleaves.asp](http://www.spenergynetworks.co.uk/pages/wayleaves.asp).
- 6.3.39 The process and timescales for constructing overhead lines can be found in section 4 of SPEN's document *Major Electrical Infrastructure Project, Approach to Routeing and Environmental Impact Assessment* on the SPEN website at [www.spendgsr.co.uk](http://www.spendgsr.co.uk).
- 6.3.40 Private water supplies (PWS) will be identified through consultation with Dumfries & Galloway Council and will be verified during field surveys. The location/source of the PWS will inform the siting of towers and the associated construction stage infrastructure. In addition, the potential effects of construction on PWS will be assessed as part of our Environmental Impact Assessment. This will also include development of mitigation measures to protect PWS where required.

## Line removal

### Summary of comments received

- 6.3.41 There were comments in support of the removal of the existing line between Glenlee and Tongland.
- 6.3.42 Information was requested on the process for removing lines, with concern that land should be fully reinstated where existing or temporary access routes and towers or other structures had been removed.

### SPEN's response

- 6.3.43 The support for the removal of the existing line between Glenlee and Tongland is noted. Support for the removal of this line was also received from Scottish Natural Heritage and Dumfries & Galloway Council (see **Appendix A**).
- 6.3.44 If a line is decommissioned, towers will be removed with components reused where possible. Foundations are removed to a minimum depth of one metre below ground level, the area cleared and the ground reinstated.

## 6.4 Comments relating to preferred routes

- 6.4.1 Comments received in feedback have been grouped according to the consultation zones, as follows:
- Zone A (including any comments about Kendoon substation);
  - Zone B (including any comments about Glenlee substation and the Carsfad and Earlstoun wood pole connections); and
  - Zone C (including any comments about Tongland substation).
- 6.4.2 Within the section relating to each Zone, comments have been further grouped under the following sub-themes, where required:
- Comments on SPEN's preferred route in that Zone;
  - Comments on SPEN's alternative routes in that Zone;
  - Suggested new or modified routes in that Zone;
  - Suggestions for routes alignments or tower/pole locations in that Zone;
  - Comments on specific environmental issues in that Zone;
  - Comments on specific socio-economic issues in that Zone; and
  - Comments on specific engineering, design or construction issues in that Zone.
- 6.4.3 SPEN has considered the comments and responded to them below.

### **Zone A (including Kendoon substation)**

#### SPEN's preferred route B

- 6.4.4 There were two comments accepting or supporting the preferred route. These welcomed the chance to remove the existing line from the proximity of a home.

- 6.4.5 There were a few comments objecting to or expressing concern about the preferred route due to the potential for increased proximity to homes, visibility of the towers due to their increased size, and the line's possible effect on property prices.

SPEN's response

- 6.4.6 Please see paragraph 6.3.21 for SPEN's comments in relation to the potential proximity of lines to properties.

**Suggested new or modified routes in Zone A**

- 6.4.7 There was a suggestion to push the overhead line westwards towards the forest at the northern end near Polquhanity to help shield the proposed larger towers from property.

SPEN's response

- 6.4.8 Informed by feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route in Zone A near Polquhanity (the **Polquhanity deviation**) which takes it slightly further west into the forest at the northern end.

- 6.4.9 The **Polquhanity deviation** follows a more westerly alignment than the current preferred route (B), running south-west from the Polquhanity T-in point before entering the coniferous forestry of Galloway Forestry Park. The route option passes through an area of recently felled forestry, increasing the distance from new build residential properties west of the A713, and emerges from the forestry to the south-west of Dundegh, before deviating eastwards and crossing the A713. The deviation then descends towards the river where the existing overhead line crosses the Water of Deugh and passes the southernmost extent of Dundegh Forest before crossing the Water of Ken to access Kendoon substation. See **Figure 6.3a** for a map of this deviation. **Appendix U** contains the findings of our appraisal.

- 6.4.10 A detailed alignment including tower locations within the proposed route will be identified during the next stage of the project.

**Suggested route alignments or tower locations in Zone A**

- 6.4.11 There was a request that, as part of the project, SPEN considers relocating the existing tower at Kendoon substation to the site of the disused recreation hall to reduce the visual impact of the project on the village. It was felt that this would cause only minor disruption to village access during construction.
- 6.4.12 There was a concern that realigning the existing route closer to homes would bring an increased risk of exposure to electric and magnetic fields (EMFs).

#### SPEN's response

- 6.4.13 We have considered the proposal to relocate the existing tower at Kendoon to the site of the recreation hall which would involve constructing a new terminal tower and associated cable sealing compound on the site of the recreation hall. Please see **Figure 6.2** for a plan. This option would mean creating a cable sealing end (CSE) compound of approximately 30 metres by 30 metres, to include the terminal tower and sealing ends themselves. This separate compound would also be enclosed by a steel palisade fence of the same type that surrounds the current substation. Whilst this would remove the terminal tower from the substation, further away from residential properties in the village, it would in effect create a separate secondary substation on the opposite side of the public road which provides access to the residential properties at Kendoon. This option is not preferred as it would introduce additional structures at height on both sides of this access road, affecting the general amenity of residents accessing Kendoon. It would also require substantial felling of woodland (some of which is designated ancient woodland) to facilitate the construction of the CSE compound (in the event that crane access is required) and the necessary permanent wayleave (80m width) for the overhead line. In order to achieve the necessary line entry approach to the CSE for the Polquhanity to Kendoon connection, an additional angle tower would likely be required on the west side of the Water of Ken. The option would add substantial cost associated with increased civil work and increased costs for cabling and creation of a cable sealing end compound. Following detailed consideration, we do not feel that this option presents the best balance of environmental, technical and cost considerations and would not propose to progress this design to the next phase of engineering design.
- 6.4.14 On this basis, it is proposed that the preferred option is that a new terminal tower for the Polquhanity to Kendoon overhead line is situated within the existing substation compound. This will be positioned and orientated to ensure that the conductors do not oversail the property curtilage at Stonebyres, as is the case with the existing overhead line. In relation to the Carsfad terminal tower, it is proposed to construct a like-for-like replacement of this tower in situ. Further details of this will be included in the next round of consultation.
- 6.4.15 Please refer to paragraph 6.3.23 for our compliance with Government guidelines on EMFs.

#### **Specific environment, landscape and amenity issues in Zone A**

- 6.4.16 There was a suggestion that SPEN could reduce the negative impact of felling coniferous woodland in Dundough Wood by planting low growing native trees such as birch, rowan and hazel.

#### SPEN's response

- 6.4.17 We believe mitigation must be related to reducing the direct and indirect effects that may result from developing the project, and we recognise that such mitigation can have wider benefits to the communities, species and habitats that may potentially be impacted by the project. Such schemes might include mitigation corridors designed to bring wider benefits to landscape and visual amenity, and which promote green places and active travel networks e.g. landscape planting/reinforcement and improving biodiversity in a particular area, or the provision of local paths and cycle ways. Our experience of delivering this type of mitigation recognises that, in order to achieve the most effective results, such proposals are best developed in partnership with local communities, landowners and relevant agencies.

## Conclusion

- 6.4.18 After reviewing all comments and suggestions in detail against i) the overarching KTR Project objective as detailed in paragraph 2.2.1 and ii) the methodology for the identification and appraisal of routes, as set out in the *Routeing and Consultation Document (October 2016)*, the proposed route for the 132kV overhead line between Polquhanity and Kendoon is route B.
- 6.4.19 However, in response to the feedback to the second round of consultation, SPEN has moved the northern part of the route slightly further westwards into the forest near Polquhanity.
- 6.4.20 **Figure 8.2a** in Chapter 8 shows the proposed route to be taken forward to the alignment and subsequent EIA stage in Zone A.

## **Zone B (including Glenlee substation)**

### SPEN's preferred route A

- 6.4.21 There were a number of comments in support of the preferred route. Reasons given were that it largely follows the route of the existing 132kV line and would have a lower visual impact on properties in comparison to the alternative routes, which were perceived as being more visible from the B7000 scenic road and along the skyline.
- 6.4.22 There was one objection to the preferred route due to the impact of bigger towers on the visual amenity of the Water of Ken valley.

### SPEN's response

- 6.4.23 The general support for the preferred route (route A) is noted.
- 6.4.24 The preferred route will cross the Water of Ken from Kendoon substation and broadly follows the alignment of the existing overhead line on the west side of the Glenkens Valley. Whilst the towers of the new overhead line will be larger than those of the existing overhead line, the preferred route offers the best potential opportunities for backclothing of the overhead line against the western slopes of the valley and minimising the potential for skylining of the overhead line in wider views within the Glenkens Valley. The preferred route also offers opportunities to improve the visual amenity from some residential properties through minor deviations from the alignment of the existing overhead line.

## **Comments on SPEN's alternative routes in Zone B**

- 6.4.25 There were a number of comments opposing all the alternative routes (B, C, D, E and F). Reasons given included the lack of existing power line infrastructure on eastern side of the Water of Ken currently and the increased potential for towers to be visible on the skyline, particularly when viewed from the B7000, which was considered to be a very scenic route.
- 6.4.26 There was also concern the routes could affect Kenbank House, which was considered a building of historic significance.
- 6.4.27 There were objections to the alternative routes due to the impact on farming activities.

#### SPEN's response

- 6.4.28 The comments relating to the alternative routes considered in Zone B have been noted, including the concerns relating to Kenbank House and land use on the eastern side of the Water of Ken.

#### **Suggested new or modified routes in Zone B**

- 6.4.29 There was a general suggestion that new routes should be sought away from the valley entirely, on the grounds of visual amenity. This was coupled with a comment that in other Zones SPEN has avoided the valleys.

#### SPEN's response

- 6.4.30 Within the upper Glenkens Valley the KTR Project must replace connections between Kendoon and Carsfad, and Earlstoun and Glenlee. Route options outwith the upper Glenkens Valley would require the overhead line connections to pass west or east of the valley over higher ground, leading to potential skylining of the overhead line visible over a wider area. Therefore, the preferred route remains within the Glenkens Valley, utilising the broad alignment of the existing overhead line which is judged to have altered the character of this side of the valley and locally increases the capacity of the upper Glenkens Valley to accommodate overhead line development (judged to be of medium landscape capacity, see Appendix 3 of *KTR Project: Routeing and Consultation Document (October 2016)*).

#### **Suggested route alignments or tower locations in Zone B**

- 6.4.31 A preference for the existing line to be upgraded in its current position.

#### SPEN's response

- 6.4.32 Whilst the existing infrastructure cannot be upgraded due to technical requirements, the preferred route for the new overhead line is in the proximity of the existing overhead line where possible to seek to minimise environmental effects, including effects on people.

#### **Specific environment, landscape and amenity issues in Zone B**

- 6.4.33 There was a suggestion that SPEN should take account of the aspirations of the Galloway Glens Landscape Partnership, which is seeking funding to improve the scenic and amenity value of the upper Water of Ken.
- 6.4.34 Respondents living near Glenlee substation were concerned about the potential visual impact of new towers in front of their homes.
- 6.4.35 Several specific places along the preferred route were identified where respondents believed putting the line underground would be most beneficial. These were (approximately north to south):
- The upper valley of the Water of Ken, between Kendoon and Earlstoun, to improve the scenic and amenity value of the upper Water of Ken; and
  - At the entry and exit points to Glenlee substation, to lessen the visual impact on neighbouring homes.

### SPEN's response

- 6.4.36 Please see 6.3.10 regarding the potential for working with communities and groups, such as the Galloway Glens Partnership.
- 6.4.37 As we move forward into consideration of detailed alignments, including tower locations, there may be opportunities to mitigate the residential visual amenity impact on a property through micro-siting of individual towers, and we would seek to do this where possible.
- 6.4.38 Please refer to paragraphs 6.2.22 to 6.2.33 for responses relating to undergrounding. Chapter 6.5 of our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* (available on the project website at [www.spendgr.co.uk](http://www.spendgr.co.uk)) outlines the circumstances where undergrounding may be considered. Feedback received during the consultation stage identified a number of locations where undergrounding may be beneficial, and we have considered each of these carefully to determine whether the likely environmental effects of the proposed route, on the premise that the principal effect of an overhead line is visual, warrant further consideration of undergrounding. At this stage, we consider that an overhead line in the locations identified will not result in very significant<sup>2</sup> visual effects and that the most effective way of causing the least visual disturbance is by careful routeing. Notwithstanding the above if, as further environmental surveys are undertaken through the EIA stage of the project, potential individual or combined adverse environmental effects are judged to be very significant, SPEN will make a clear and transparent decision on the undergrounding of any section of overhead line in accordance with our documented approach.

### **Specific engineering, design or construction issues in Zone B**

- 6.4.39 There was a request for towers to be coated green or brown to reduce the visual impact of the project, and a comment that recently installed galvanised metal towers in the area show up clearly against the backdrop of the hillside.
- 6.4.40 There was concern that SPEN should consider the likely impact on stock management, and potential damage to dykes, fences and woodland during construction.
- 6.4.41 There was also concern about the potential for construction nuisance for homes near Glenlee substation. Particular issues included the prospect of HGVs running past homes, the potential use of unadopted or private roads by construction vehicles and the likelihood of damage to infrastructure, such as water pipes, beneath the road surface. It was suggested that previous activity at Glenlee substation had resulted in water mains flooding.
- 6.4.42 There was a query whether noise levels from the substation would increase as a result of SPEN's planned work there.

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<sup>2</sup> "Very significant" is identified through Environmental Impact Assessment (EIA) and represents a degree of likely significant adverse effect, accepting that an overhead line is likely to have a significant adverse visual effect.

### SPEN's response

- 6.4.43 Please refer to paragraph 6.3.34 regarding the coating of towers.
- 6.4.44 Please refer to paragraph 6.3.38 regarding minimising damage to landholders' interests.
- 6.4.45 The construction of Glenlee substation will create a significant volume of traffic in this area during the construction period. We aim to minimise any potential impact to residents, businesses and communities and will undertake a full traffic and transport assessment of the substation in support of the planning application. This will include an outline Traffic Management Plan (TMP) developed with the local roads authorities and the police.
- 6.4.46 If the project obtains consent, a detailed TMP would need to be submitted to the local roads authority and this would include an assessment of the condition of any local roads to be used by construction traffic and the standard of reinstatement post-construction.
- 6.4.47 No new transformers are planned to be installed as part of the substation installation so there is unlikely to be a change in the current noise baseline at the site during operation.

### Conclusion

- 6.4.48 After reviewing all comments and suggestions in detail against i) the overarching KTR Project objective as detailed in paragraph 2.2.1 and ii) the methodology for the identification and appraisal of routes, as set out in the *Routeing and Consultation Document (October 2016)*, the proposed route for the 132kV overhead line between Kendoon and Glenlee is route A. **Figure 8.2b** in Chapter 8 shows the proposed route to be taken forward to the alignment and subsequent EIA stage in Zone B.
- 6.4.49 The preferred routes for wooden pole connections from Carsfad to Kendoon and from Earlstoun to Glenlee have been confirmed as the proposed routes for these connections.

### **Zone C (including Tongland substation)**

- 6.4.50 The preferred route in Zone C is made up of five sections north to south, each containing its own preferred route and alternative options. Please refer to the maps of the route options shown as figures 4.2, 4.3a-e, 4.4a-b, 4.5a-f in the *KTR Project: Routeing and Consultation Document (October 2016)*.
- 6.4.51 Comments about Zone C have been summarised by section and route identification number.

### **SPEN's preferred route section 1A**

- 6.4.52 There was opposition to route section 1A where it crossed the A712 due to the potential proximity to the property at Darsalloch and the disruption to wildlife there.

### SPEN's response

- 6.4.53 Informed by feedback received during this round of consultation, we have identified and appraised three potential deviations to the preferred route near Darsalloch (***Darsalloch 1, 2 and 3***), which would increase the distance, and reduce associated residential visual amenity effects, on the property at Darsalloch.
- 6.4.54 Deviation ***Darsalloch 1*** follows preferred route (1A) south-west of the Glenlee substation. It runs parallel with the existing Glenlee-Newton Stewart (BG) Route south-west through Black Bank Wood then deviates southwards, following a more westerly alignment than the current preferred route, before turning south-east, crossing the current preferred route option to the west of Barn Knowe, but remaining west of this woodland and the residential property of Airie. The deviation then crosses the A712/The Queen's Way slightly further east of the current preferred route before entering the coniferous forest of Galloway Forest Park, where it passes west of Peal Hill before rejoining the current preferred route and continuing south.
- 6.4.55 Deviation ***Darsalloch 2*** follows the same alignment as *Darsalloch 1* until west of Shiel Hill, where *Darsalloch 1* deviates east and *Darsalloch 2* continues south. The route then crosses the relatively elevated and open ground of Gallows Knowe and Rig of Airie before crossing the A712/The Queen's Way west of the current preferred route, before entering the coniferous forest of Galloway Forest Park, where the route passes across the eastern flanks of Darsalloch Hill, and west of the residential property of Darsalloch, before deviating south-east to cross Darsalloch Burn. The route then rejoins the current preferred route to the south-west of Peal Hill.
- 6.4.56 Deviation ***Darsalloch 3*** follows the same alignment as *Darsalloch 2* until west of Barn Knowe, where *Darsalloch 2* continues south, and *Darsalloch 3* takes a south-westerly alignment, passing over relatively elevated and open ground between Maggot Hill and Gallows Knowe, before crossing the A712/The Queen's Way further west of *Darsalloch 2*, passing around the western flanks of Darsalloch Hill, and deviating south-eastwards through coniferous woodland towards Darsalloch Burn. It rejoins the current preferred route to the south-west of Peal Hill.
- 6.4.57 Please **Figure 6.3b** for a map of these deviations and **Appendix U** for the findings of the appraisals SPEN carried out.

### **SPEN's preferred route section 2B**

- 6.4.58 A number of respondents expressed support for preferred route section 2B, reasoning that by being partially contained within forest it had more potential for being hidden from view for most people. Others believed it would affect the fewest number of homes overall, and was a reasonable distance from the diverse and important woodlands along the eastern flank of Laurieston Forest.
- 6.4.59 However, there were a significant number of comments raising specific opposition to or concern about this section, largely due to its expected negative visual impact on properties and communities currently unaffected by any power line, such as at Laurieston and Edgarton, and the line's potential impact on tourism and wildlife.

- 6.4.60 There were a number of specific concerns raised about the effect on landscape and visual amenity (listed approximately north to south):
- a) Concern about visual impact from Stroan Viaduct, where the line leaves the forest and crosses open fields;
  - b) The potential for visual impact of a new overhead line to affect regionally-important planned developments on an estate at Slogarie, which would depend on a tranquil, unspoilt landscape;
  - c) The effect on views from walks west of Mossdale towards Stroan Loch and the potential impact on visitors to the area;
  - d) Concern about effect of tracks and towers on landscape features where it crosses the Laurieston to Gatehouse road (a concern common to all route options);
  - e) The effect on visual amenity for properties at Edgarton, where the proposed overhead line leaves Laurieston Forest towards Bargatton Loch, and a feeling this goes against the Holford Rule to 'avoid as far as possible dominating isolated house, farms or other small scale settlements'; and
  - f) The effect on views of the line from scenic routes east of Loch Ken, such as from Glenlaggan Wood and viewpoint and core path 192.
- 6.4.61 There were a number of specific concerns raised about the effect on the environment, including heritage features:
- i) The effect on wildlife and the potential to deter red kites;
  - ii) The route passes over a historic landmark at Slogarie, which was not marked on SPEN's maps;
  - iii) The impact on an historic feature at Edgarton Mote fort (common to all SPEN's route options in section 2); and
  - iv) The impact on views from Neilson's monument at Barstobrick Hill (common to all SPEN's route options in section 2).

SPEN's response

- 6.4.62 Please see paragraph 6.3.19 for SPEN's approach to tourism, recreation and land use such as forestry and farming, and paragraph 6.3.21 for comments in relation to the potential proximity of lines to properties.
- 6.4.63 (a) Specific views from Stroan Viaduct and Stroan Loch have been considered during the routeing and appraisal stage and will continue to form key considerations for the alignment and EIA stage. The presence of intervening topography and forestry provides the opportunity to minimise visibility of the overhead line from Stroan Viaduct. In addition, crossing the River Dee/Black Water of Dee south-east of the viaduct would help avoid the key views north-west across Stroan Loch.
- 6.4.64 (b) The presence of Bennan Hill to the north of the non-inventory garden and designed landscape (NIDL) of Slogarie, as well as forestry on the eastern slopes of Slogarie Hill, gives us an opportunity to reduce the visibility of the overhead line from residential properties near and within the Slogarie Estate without compromising biodiversity (ornithological) constraints to the west. However, informed by feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route near Slogarie (the *Slogarie deviation*) which offers the potential to reduce visibility of the overhead line from residential properties and other key viewpoints without compromising the biodiversity (ornithological) constraints to the west.

- 6.4.65 The **Slogarie deviation** follows a more northerly alignment than preferred route (2B), running almost parallel to it from where they diverge east of Stroan Hill. It then enters coniferous forestry north-west of Bennan Hill, following a south-easterly alignment to the west of Slogarie. It rejoins the current preferred route to the south-west of Bennan Hill. Please see **Figure 6.3c** for a map of this deviation and **Appendix U** for the findings of the appraisal SPEN carried out.
- 6.4.66 (c) The presence of tracks and paths has been considered at the route option appraisal stage and will continue to be taken account of during the detailed alignment stage. Where possible, crossing perpendicularly to the footpath and cycle paths such as along Stroan Viaduct would help minimise sequential views of the overhead line from these routes.
- 6.4.67 (d) Local landscape features along the Laurieston to Gatehouse road associated with the crossing of this minor road will be considered during the detailed routeing and project design in order to minimise potential effects during the construction and operation of the overhead line.
- 6.4.68 (e) Informed by feedback received during this round of consultation, we have identified and appraised a deviation to the preferred route in this area (the **Edgarton deviation**), to avoid the principal views from Edgarton Cottage and sequential views experienced when approaching the properties of Edgarton Farmhouse and Edgarton Cothouse.
- 6.4.69 The **Edgarton deviation** leaves the current preferred route (2B) south of Kenick Burn, continuing south-east through coniferous forestry of the Galloway Forest Park and emerging from the forestry north of Edgarton Cothouse. The route then descends south-eastwards towards the A762 north of Edgarton Mote, before crossing the A762 and rejoining the preferred route just to the west of Bargatton Loch. Please see **Figure 6.3d** for a map of this deviation and **Appendix U** for the findings of the appraisal SPEN carried out.
- 6.4.70 (f) The existing line between Glenlee and Tongland is close to promoted tourist and recreational routes which follow the A713 (Galloway Tourist Route, Galloway Red Kite Trail, Robert the Bruce Trail), as well as promoted viewpoints (Glenlaggan Wood) and Core Paths (Parton Path –192). The preferred route on the west side of Loch Ken will locate the overhead line approximately 2-3km to the west, south-west of these. The existing line will eventually be removed.
- 6.4.71 i) In relation to wider environmental issues, effects on biodiversity including birds such as red kite have been taken into account in the appraisal of route options. Ecological and ornithological field surveys will be carried out during spring/summer 2017 and the findings will inform the detailed alignment and EIA stages to avoid/minimise effects on habitats and protected species.
- 6.4.72 ii) Direct effects on cultural heritage features will be avoided where possible and potential indirect effects on the setting of features have been taken account of during the route appraisal stage and will continue to be taken account of during the detailed alignment and subsequent EIA stage. Please also see paragraph 6.3.6 for information relating to the mapping of the feature at Slogarie.

- 6.4.73 iii) The potential for effects on the setting of the fort at Edgarton Mote, which is located in open area of moorland east of Edgarton Farm, has been considered as part of the identification and appraisal of route options in this area. However, informed by feedback received during this round of consultation (including from Historic Environment Scotland and Dumfries & Galloway Council – see **Appendix A**), we have identified and appraised a modification to the southern section of preferred route (2B), which passes north of Edgarton Mote Fort and outside the main view from the fort. Please see paragraph 6.4.69 for a description of the **Edgarton deviation**. Potential effects on the setting of the fort will be assessed as part of the EIA.
- 6.4.74 iv) Views from Neilson's Monument on Barstobrick Hill were considered in the appraisal of route options. The preferred route would be visible from Barstobrick Hill and the monument at a distance of approximately 800m appearing at a lower elevation than the monument and backclothed against the underlying landform and forestry. Views from this location will be assessed as part of the EIA.

#### **SPEN's preferred route sections 3C, 4A and 5B**

- 6.4.75 Specific support was expressed for the route sections south of the A75, which includes part of section 3C and sections 4A and 5B. The reasons given were that these sections were close to the existing line and would be acceptable to those people who already have a view over it.
- 6.4.76 As with route 2B, concern was raised about the impact of route section 3C on views from Neilson's monument at Barstobrick Hill (common to all SPEN's route options in section 3).

#### SPEN's response

- 6.4.77 The comments in support of these sections have been noted. Please also see paragraph 6.4.74 above for Barstobrick Hill.

#### **Comments on SPEN's alternative routes in Zone C**

- 6.4.78 A number of respondents who opposed the preferred route expressed a preference for one of SPEN's alternative routes. These have been summarised by section and route identification number.

#### **Alternative route 1B**

- 6.4.79 There was a preference for route section 1B due to it being more direct and having less impact on property and wildlife at Darsalloch.

#### SPEN's response

- 6.4.80 Informed by feedback received during this round of consultation, we have identified and appraised three potential deviations to the preferred route near Darsalloch. Please see paragraphs 6.4.54 to 6.4.56 for descriptions of the deviations.

### Alternative route 2A

- 6.4.81 There were several comments in support of alternative route 2A, stating reasons such as its reduced visual impact on properties and people; it would avoid a locally-valued feature referred to as the 'beech avenue'; a perception that it is shorter with fewer angles and could be less costly; and that it disturbs the smallest area of native woodland/NWSS (Native Woodland Survey of Scotland), which was seen to be beneficial to birds. There was also support due to its potential to be hidden among non-native Sitka spruce plantations.
- 6.4.82 There was also some opposition to this route. Reasons given were visual amenity in general; concerns about bird species at the northern end including eagles, black grouse, merlin, osprey, hen harriers and nightjar; the proximity to Laughenghie and Airie Hills SSSI site; the potential impact on a popular fishing venue at Lochenbreck Loch and a nearby home; the possible effect on private water supplies for properties in and around Lochenbreck; and the impact on a new mixed-species woodland and its wildlife where the route crosses the Laurieston to Gatehouse road.

### SPEN's response

- 6.4.83 The feedback in relation to both support and opposition to alternative route 2A is noted.
- 6.4.84 Informed by the feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route near Slogarie which would move it slightly further west towards alternative route 2A but without compromising the biodiversity (ornithological) constraints to the west. Please see paragraph 6.4.65 for information about the *Slogarie deviation*.

### Alternative routes 2C to 2H

- 6.4.85 Some respondents stated a preference for routes east of Edgarton (all route sections 2C to 2H) to avoid visual impact from communities.
- 6.4.86 Those opposing these routes expressed concern about their closer proximity to homes in places such as Woodhall Loch, Mossdale and Laurieston, their increased potential to disrupt areas of important ancient woodland and a number of habitats for protected species, and importance for tourism.
- 6.4.87 There was a view that the routes 2C, 2D, 2E, 2F, 2G and 2H should be removed as alternatives altogether due to their proximity to Retreat Wood, where it was felt it would be impossible to hide the power line along the ridge. Retreat Wood was considered of particular value as a wildlife habitat, a recognised ancient forest, and important for tourism. A large diversity of birds was mentioned in this area including a number of Red listed species including wood warbler, spotted flycatcher, willow tit, pied flycatcher, grey wagtail and tree pipit as well as green woodpeckers, redstarts and bullfinches.
- 6.4.88 Reference was made to recent efforts by the Forestry Commission to restore a fragmented ancient deciduous forest running from Retreat Wood north and west along Kenick Burn, which was said could become 'an important bird area on a UK scale' and was supported by the Dumfries and Galloway Forestry and Woodland Strategy.

#### SPEN's response

- 6.4.89 Informed by feedback received during this round of consultation, we have identified and appraised a deviation to the preferred route near Edgarton. Please see paragraph 6.4.69 for information about the *Edgarton deviation*.
- 6.4.90 The deviation described in paragraph 6.4.69 does not compromise the feedback outlined above in relation to localised issues with 2C.
- 6.4.91 SPEN is liaising with Forestry Commission Scotland and Forest Enterprise Scotland in relation to the Forest Design Plans for the Bennan and Laurieston Forests to seek to minimise effects on the woodland resource and forestry operations.

#### **Alternative route 5A**

- 6.4.92 There was a comment that route section 5A, being further west, could reduce noise and any inconvenience due to construction traffic and ongoing access arrangements in Tongland.

#### SPEN's response

- 6.4.93 Opportunities to site towers and associated infrastructure to the westernmost extents of the proposed route (5B) will be considered where possible to seek to minimise noise during construction. Traffic effects will be assessed as part of the EIA.
- 6.4.94 Please refer to paragraph 6.3.35 and 6.3.36 for SPEN's approach to managing the impact of construction, including traffic.

#### **Suggested new or modified routes in Zone C**

- 6.4.95 It was suggested that more appropriate routes would be close to the existing line to the east of Loch Ken or further west of the study area, both of which were considered as alternative corridors during the first round of consultation, but which were not adopted by SPEN. There was also a suggestion that a cable be placed under Loch Ken.
- 6.4.96 It was also suggested that, instead of removing the existing 132kV single circuit transmission line between Tongland and Dumfries, it could be changed to a double circuit. It was believed that this would remove the need for a new line between Glenlee and Tongland altogether.
- 6.4.97 There was a suggestion to modify the preferred route 1A to take it just east of new woodland which is in the process of being planted at Rig of Airie. The reasons given included that it would avoid land sterilisation and an impact on forestry operations and several archaeological features. It was further suggested that by taking the line east as it crosses the Craigshinnie Burn to the north of the Gatehill Road, it could also avoid crossing the dam to the west of Sheil Hill and causing a potential risk to fishermen.
- 6.4.98 There were also suggestions to move preferred route 1A further west to provide more options for reducing the potential visual effects on Darsalloch, for instance passing west of or on the eastern shoulder of Darsalloch Hill.

- 6.4.99 There was a suggestion to amend the preferred route 2B east of Loch Stroan to make it less obvious from a number of sensitive features such as Mossdale village, the Raiders Road Forest Drive, various walks and visitor car parks and the area around the railway bridge. There was a belief that these modifications could also make the line more accessible for SPEN.
- 6.4.100 There was a suggestion to place the connection in Loch Stroan.
- 6.4.101 There was a suggestion to modify the preferred route 2B as it passes the eastern side of Slogarie Hill 40m into adjacent agricultural land, or that it could be improved by taking it some distance into the forest to the west.
- 6.4.102 There was a suggestion that the route south of Kenick Wood should deviate west of Cullenoch and then south-east, passing west of Dinnance, to join the easterly route option north east of Edgarton Mote, crossing the A762 at Edgarton Bargatton Lane Ends.
- 6.4.103 There was a suggestion for a route east of Dinnance.
- 6.4.104 There was a suggestion that the route could be placed in the River Dee, or underground close to the river.

SPEN's response

- 6.4.105 A corridor which follows the route of the existing overhead line east of Loch Ken was identified and appraised as corridor G/T 4 during the first round of consultation in 2015. G/T 4 was not progressed by SPEN as the preferred corridor on the basis of the potential for collision risk impacts on the qualifying bird species of the Ramsar/SPA, that landscapes have lower capacity to accommodate the new overhead line, the potential for visual impacts on a number of key viewpoints (including tourist routes) around Loch Ken and the relatively higher density of residential properties. However, please see paragraphs 6.2.41 and 6.2.42 for details of a further routeing study we have conducted in response to the significant community interest in the potential for a route following the existing overhead line in corridor G/T 4.
- 6.4.106 A corridor running further west of the current study area was identified and appraised as corridor G/T 1 during the first round of consultation in 2015. This corridor, and the reasons it was not taken forward for further routeing development, are described in paragraph 6.2.40. As support for this corridor was relatively limited (one person expressed a preference for this corridor during the second round of consultation), no further study has been carried out on corridor G/T 1.
- 6.4.107 Please see paragraph 6.2.44 for our response to the suggestion about putting lines under Loch Ken.

- 6.4.108 The existing line between Tongland and Dumfries could not be preserved in its current form. It would need to be completely replaced with a new double circuit 132kV overhead line in order to meet the requirements of the current proposal. Connecting the Tongland generation to Dumfries would add to the current loading of the 132kV network between Chapelcross and Gretna/Harker which would require the uprating of the line between Chapelcross and Gretna/Harker. This would also require an extension of the substation at Gretna. Our proposal is to divert the Tongland generation from Dumfries to Glenlee (the generation would then flow north to Ayrshire) which would allow us to reduce the demands on the transmission network between Dumfries, Chapelcross and Gretna, therefore avoiding the need for any further reinforcements. We feel that this is the most economic and efficient way to develop the 132kV transmission network in this area.
- 6.4.109 Informed by feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route near Darsalloch (deviation **Darsalloch 1**), which minimises the effects on residential amenity of the property at Darsalloch and minimises the loss of woodland by routing further to the east without compromising the residential visual amenity of the property at Airie and wider views from New Galloway. Please see paragraph 6.4.54 for more information about deviation **Darsalloch 1**, **Figure 6.3b** for a map and **Appendix U** for the findings of the appraisals SPEN carried out.
- 6.4.110 Loch Stroan is designated as an SSSI, which has been avoided during routing as this represents an 'area of highest amenity value' within SPEN's routing methodology. Loch Stroan is also known to be a key viewpoint and visitor attraction within the local area. It would be adversely affected by terminal towers which would be required at either side of the loch to facilitate an underwater cable connection. However, informed by the feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route north of Stroan Loch (the **Stroan Loch deviation**) taking it further into forestry north and east of the loch.
- 6.4.111 The **Stroan Loch deviation** leaves the current preferred route (1A) to the north of Loch Stroan, running south-east across Bennan Moss. It continues on this alignment, passing around the northern flanks of Airds Craig, until meeting the Raiders Road Forest Drive, where it turns south and crosses the forest drive, before rejoining the preferred route to the north of Stroan Viaduct. Please see **Figure 6.3c** for a map of this deviation and **Appendix U** for the findings of the appraisal SPEN carried out.
- 6.4.112 Informed by feedback received during this round of consultation, we have identified and appraised a potential deviation to the preferred route near Slogarie that offers the potential to reduce visibility of the overhead line from residential properties without compromising the biodiversity (ornithological) constraints to the west. The deviation runs parallel but slightly to the north and west of the preferred route between Stroan Hill and Bennan Hill. Please see paragraph 6.4.65 for information about the **Slogarie deviation**, **Figure 6.3c** for a map and **Appendix U** for the findings of the appraisals SPEN carried out.
- 6.4.113 Informed by feedback received during this round of consultation, we have identified and appraised a deviation to the preferred route near Edgarton. Please see paragraph 6.4.69 for information about the **Edgarton deviation**, **Figure 6.3d** for a map and **Appendix U** for the findings of the appraisal SPEN carried out.

- 6.4.114 A route east of Dinnance would involve passing between two residential properties (Dinnance to the south, Gatehouse to the north) which would also lead to potential effects on residential amenity of these properties and to potential effects on recreational interests where it would cross the core paths within Laurieston Forest and route in proximity to Retreat Wood. There would also be potential effects on Dinnance cairn area of archaeological significance. For further detail on the specific issues considered in our appraisal of these particular route options, please see table 5.2 “Emerging route preferences” on page 27 of the *KTR Project: Routeing and Consultation Document (October 2016)*.
- 6.4.115 Regarding the River Dee suggestion, open-cut trenching is the most frequently used construction method for cable installation. Laying a cable along the bed of the watercourse where it could be damaged by debris would impact on the reliability of the circuit and could also be dangerous. Access for construction and maintenance of the cable would also be difficult. For further information on SPEN’s approach to undergrounding, see paragraphs 6.2.22 to 6.2.33.

### **Suggestions for route alignments or tower locations in Zone C**

- 6.4.116 There was a suggestion that any new infrastructure installed at Tongland Power Station (sic.) should be kept away from the road to reduce its visual impact. This respondent also expressed a wish that SPEN devise a long term plan to move all existing connections away from the road.
- 6.4.117 A request was made for the power lines in section 5 to be placed as far to the west of Tongland Quarry as possible to minimise the potential for mineral sterilisation and the health and safety issues associated with working under power lines.

#### SPEN’s response

- 6.4.118 Work at Tongland Power Station is not proposed as part of this project. However, there will be some work required within the Tongland substation in order to connect the new overhead line between Glenlee and Tongland. Tongland substation is an integral part of the transmission network and will continue to provide electricity supplies to the region for the foreseeable future. As part of the KTR Project, the substation is being reconfigured to accommodate a new double circuit overhead line from Glenlee. The new terminal overhead line tower as part of the reconfiguration will be installed to the north of the site, away from the road, and a significant amount of the existing infrastructure closer to the road at the north of the site will be removed, including the overhead line to Dumfries which crosses the A71.
- 6.4.119 Opportunities to site towers and associated infrastructure to the westernmost extents of the proposed route will be considered where possible.

### **Specific environment, landscape and amenity issues in Zone C**

- 6.4.120 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views, and a number of different bird and other species which should be considered.
- 6.4.121 There was a general comment that SPEN was not using lower ground at every opportunity.

- 6.4.122 There were suggestions that SPEN should use planting to encourage wildlife and lessen the impact on visual amenity wherever possible. Locations mentioned were where the preferred route crosses the Laurieston to Gatehouse road, where it closely follows the existing road south of the A75, and close to Tongland Power Station. There was a comment that SPEN should consider opportunities to develop the benefits to wildlife of the openings the overhead line corridor would create in the forested habitat.
- 6.4.123 There was a request for information about how SPEN will take account of activities to encourage pine martens during its routing process.
- 6.4.124 There was concern that the regular clearing of vegetation along the line route would cause severe disruption to wildlife.
- 6.4.125 Several specific places along the preferred route were identified where respondents believed putting the line underground would be most beneficial. These included (approximately north to south):
- Near the historic Queen's Way (A712), due to its potential to become an entrance to a future National Park and the visual impact on visitors and residents;
  - Around the northern approach to Loch Stroan;
  - Under Loch Stroan;
  - West of Mossdale along the disused railway line and onward to Stroan Loch, due to the existing walks, views and wildlife which help attract visitors to the village;
  - Under the River Dee or following the river's route underground;
  - Point of crossing the A75, due to its importance as a tourist route; and
  - Tongland.

#### SPEN's response

- 6.4.126 All local areas, sites and features which people have identified as important for wildlife, archaeology, recreation, tourism, development and views have been noted and will be taken into account during the detailed alignment stage and EIA.
- 6.4.127 The corridor of land which forms the study area for the route options we have consulted on tends to follow valleys, avoiding areas of highest environmental value and limiting widespread visibility of the pylons by avoiding higher ground wherever possible. However, in some areas of the route, we have been required to strike a balance by having to pass over relatively higher ground in order to avoid other constraints, e.g. environmentally designated areas, and avoid/minimise effects on people and views.
- 6.4.128 Please see paragraph 6.3.10 regarding the possibility of mitigation.
- 6.4.129 Existing information in relation to the presence of pine marten is currently being collated in consultation with the Forestry Commission Scotland and Scottish Natural Heritage, and protected species surveys will be undertaken in spring/summer 2017. We will assess the potential effects on pine marten as part of the environmental assessment of the eventual proposed route.

- 6.4.130 During operation of the overhead lines clearance will need to be maintained between conductors (wires) and any object that could be used as a climbing aid e.g. trees, fences, walls etc. Safety clearances will also need to be maintained in areas of woodland or forestry to ensure that trees cannot fall and damage the line. The size of the wayleave required through such areas will be determined by the type of trees, for example in areas of commercial forestry SPEN would seek to maintain an 80m wayleave. However, where the line is within hardwood broadleaf woodland this wayleave could be reduced (based on a condition assessment of the surrounding trees) and it may be feasible to lop or 'crown' trees to avoid having to fell. Furthermore, within any wayleave corridor, as part of good practice forest design, it would be possible to plant low growing shrub species in order to 'taper' woodland edges and potentially create habitat for wildlife.
- 6.4.131 Please see paragraphs 6.2.22 to 6.2.33 for general comments regarding undergrounding. Our *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* document (available at [www.spendgsr.co.uk](http://www.spendgsr.co.uk)) outlines the circumstances for the consideration of undergrounding. Feedback identified a number of locations where undergrounding may be beneficial, and we have considered each of these carefully to determine whether the likely environmental effects of the proposed route, on the premise that the major effect of an overhead line is visual, warrant further consideration of undergrounding. At this stage, we consider that an overhead line in the locations identified will not result in very significant<sup>3</sup> visual effects and that the most effective way of causing the least visual disturbance is by careful routeing. Notwithstanding the above if, as further environmental surveys are undertaken through the EIA stage of the project, potential individual or combined adverse environmental effects are judged to be very significant, SPEN will make a clear and transparent decision on the undergrounding of any section of overhead line in accordance with our documented approach.

### Specific socio-economic issues in Zone C

- 6.4.132 Respondents identified a number of places they considered important for tourism and recreation. Comments included references to a number of regional designations, previously mentioned in paragraph 6.3.15. Those specific to Zone C included The Queen's Way, the Raiders Road and the Galloway Red Kite Trail.
- 6.4.133 Concerns were raised for the impact on business and livelihoods in the area affected by the line, such as farming. One art-related business mentioned its reliance on the wilderness and natural beauty of the Kenick area, near Laurieston.

#### SPEN's response

- 6.4.134 Viewpoints and key tourist routes, including the Queen's Way, Raiders Road Forest Drive and Galloway Kite Trail were identified and included as landscape and visual criteria in the appraisal of corridors as part of the wider DGSR Project and also in the appraisal of route options for the KTR Project. Key viewpoints and routes used for recreation and tourism will continue to be considered during the detailed alignment stage, when siting of towers/poles and other infrastructure will seek to avoid/minimise effects on tourism and recreation. A detailed assessment will be undertaken as part of the EIA process.

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<sup>3</sup> "Very significant" is identified through Environmental Impact Assessment (EIA) and represents a degree of likely significant adverse effect, accepting that an overhead line is likely to have a significant adverse visual effect.

- 6.4.135 Please refer to paragraphs 6.3.19 and 6.3.21 regarding **Socio-economic impacts in general**.

#### **Specific engineering, design or construction issues in Zone C**

- 6.4.136 A number of respondents suggested alternative means of supporting wires to reduce visual impact in key areas, for instance shorter towers or twin wooden poles, such as at the 'pinch point' west of Mossdale and east of Stroan Loch.
- 6.4.137 There were comments about the suitability of certain local roads for construction traffic. Particular reference was made to:
- The Queen's Way, near New Galloway;
  - The C13 Laurieston to Gatehouse road in Zone C, which was felt already heavily used by forestry traffic;
  - Forest access roads close to private properties, particularly the impact on safety and personal journeys and the suitability of using such roads where junctions may not be up to an appropriate standard.
- 6.4.138 There was concern over how SPEN will get construction access to the substation at Tongland and the potential disruption this might cause on the A711, which is the main road between Kirkcudbright and the strategic route of the A75. This was coupled with a suggestion that access could be from the west from the A762, with temporary widening of the road.
- 6.4.139 Other issues which respondents identified as potential factors for consideration were:
- a) The impact of construction and access issues on farming activities, and the longer term impact of the presence of towers in fields on mowing and ploughing operations;
  - b) The presence of and need to protect private water supplies;
  - c) Plans for new forestry in general and requests for planting to be used as screening, particularly near the A75 and at Tongland Power Station;
  - d) Areas used as a former dump and a former tannery near New Galloway; and
  - e) Planned quarrying activities near Tongland.
- 6.4.140 There was a query whether SPEN had carried out any geophysical surveys along its preferred route 2B.

#### SPEN's response

- 6.4.141 Please refer to paragraphs 6.3.32 and 6.3.33 regarding the use of twin wooden poles.
- 6.4.142 Please see paragraphs 6.3.35 and 6.3.36 regarding the suitability of roads during construction.
- 6.4.143 Some disruption will be inevitable in a project of this size, but it's too early to be precise about the impact on specific sites and roads until we have developed our final proposals. We aim to minimise any potential impact to residents, businesses and communities. Our Environmental Statement, which we will submit as part of our applications for section 37 consent, will include an outline Traffic Management Plan (TMP) developed with Transport Scotland, the local roads authorities and the police.

- 6.4.144 If the project obtains consent, a detailed TMP would need to be submitted to the local roads authority and this would include assessing the condition of any local roads to be used by construction traffic and the standard of reinstatement post-construction. In addition to this, and building on experience from previous projects, SPEN would investigate the possibility of establishing a traffic management forum which would consist of the local authority roads and planning teams and members of the local community in order to monitor the works and address any issues that may arise e.g. traffic management in a timely manner.
- 6.4.145 a) Please see paragraph 6.3.19 for farming and 6.3.37 for construction access.
- 6.4.146 b) Please refer to paragraph 6.3.40 regarding private water supplies.
- 6.4.147 c) Please refer to paragraph 6.3.19 for consideration of forestry. The issue of using planting for visual benefit, and other mitigation measures, is discussed in paragraph 6.3.10.
- 6.4.148 d) Detailed desk and field surveys will be carried out in 2017 in consultation with stakeholder organisations including Dumfries & Galloway Council and Scottish Environment Protection Agency (SEPA), to identify baseline conditions, which will include current, and where relevant, previous land uses, to inform the detailed alignment and subsequent EIA stages.
- 6.4.149 e) SPEN is currently consulting the owners/operators of the existing quarry near Tongland in relation to its potential plans for future extraction in the area to seek to take account of this where possible during the detailed alignment stage.
- 6.4.150 Desk and field based hydrological and hydrogeological surveys, including peat probing, will be undertaken as part of the EIA and will inform the siting of towers and associated infrastructure.

#### Conclusion

- 6.4.151 After reviewing all comments and suggestions in detail against i) the overarching KTR Project objective as detailed in paragraph 2.2.1 and ii) the methodology for the identification and appraisal of routes, as set out in the *Routeing and Consultation Document (October 2016)*, the proposed route for the 132kV overhead line between Glenlee and Kendoon is route 1A/2B/3C/4A/5B.

6.4.152 However, in response to the feedback from the public and consultees to the second round of consultation, the proposed route for this part of the project will include the following changes:

- 1) Section 1A has been modified to cross the A712/The Queens's Way further east, increasing the distance from and reducing associated residential visual amenity effects on the property at Darsalloch, as well as minimising loss of woodland;
- 2) Section 2B has been modified in three areas:
  - One minor deviation north of Stroan Loch is proposed which moves the route slightly north-eastwards, but not as far as the suggested Stroan Loch Deviation to avoid increasing visibility of the route from the community of Mossdale and the A762;
  - A second deviation north-west of Slogarie takes advantage of forestry on the eastern slopes of Slogarie Hill, to reduce visibility of the overhead line from residential properties, without compromising ornithological constraints to the west;
  - The third deviation passes north of the properties at Edgerton, to avoid the principal outlook from these properties and the setting of Edgerton Mote SM.

6.4.153 **Figures 8.2c-e** show the proposed route to be taken forward to the alignment and subsequent EIA stage in Zone C.

## 6.5 Comments relating to the consultation process

6.5.1 The following sub-themes emerged in the comments received from the feedback:

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

6.5.2 SPEN has considered the comments and responded to them below.

### General matters relating to the consultation

6.5.3 The vast majority of comments relating to SPEN's consultation approach, materials, staff or exhibitions were complimentary or appreciative with one respondent commending SPEN for 'listening and acting on the concerns of residents'. Other comments included the helpfulness, expertise and professionalism of staff at exhibitions, the usefulness of the leaflet and the availability of supporting evidence.

6.5.4 However, there were some expressions of dissatisfaction which are detailed below with SPEN's responses to them.

6.5.5 There were several transactional requests relating to the consultation, including several people who asked to be updated as the project progresses, others who provided alternative contact details or nominated another representative or organisation to manage their formal response to the consultation.

### SPEN's response

- 6.5.6 The overall objective of our consultation is to ensure that all parties with an interest in the KTR Project continue to have access to up-to-date information, and clear and easy ways in which to shape and inform our proposals at the pre-application stage.
- 6.5.7 Our consultation strategy for the second round of consultation took account of feedback submitted by stakeholders and communities during the first round of consultation and was shared with statutory stakeholders in advance.
- 6.5.8 A summarised overview of the comments and how these influenced the strategy is provided in Appendix 7 of the *KTR Project: Routeing and Consultation Document (October 2016)*, which is available on our website.
- 6.5.9 We welcome the comments we have received relating to the consultation and will take note of these in devising our strategy for the next round of consultation.

### **The consultation process**

- 6.5.10 A small number of respondents expressed a belief that the project was a fait accompli or that SPEN's mind was already closed to the idea of using one of the alternative routes put forward, or the potential for undergrounding some or all of the route.
- 6.5.11 There was a view that feedback from private individuals or householders would have less influence than larger organisations and residents' interests could be 'sidelined' in favour of the needs of tourists, wildlife or buildings.
- 6.5.12 There was concern from two respondents in the far west of the study area in Zone C that they were not aware of previous consultation and only received information from SPEN regarding the project for the second round of consultation. There was a view that changes to the study area should have been made clearer in the leaflet which accompanied the consultation.
- 6.5.13 A resident at Edgarton said the fact that the preferred route was not included in the first round of consultation and was the result of feedback made them feel their small community were 'sacrificial lambs'.
- 6.5.14 One person felt that, given the delays in publishing the report on the previous consultation round and the significant change in the scope of the project, there was not enough time for members of the public to properly assess the revised proposals in order to respond fully.

### SPEN's response

- 6.5.15 The consultation process is being carried out to ensure that all stakeholders can influence the development of the project and is an ongoing process. A third round of consultation will be carried out in due course. The purpose of the second round of consultation was to give people the chance to review and influence the design of route options. There is no question of any of the preferred or proposed routes having been pre-determined. The willingness of SPEN to introduce some deviations to the preferred routes is evidence of that.

- 6.5.16 Our aim is to find a route which provides the best balance of our technical requirements with the impact on the environment and the people who live, work and enjoy spending their spare time in the area. We take these environmental responsibilities very seriously and are committed to working closely with communities. Everyone's point of view is important and we consider every single comment very carefully, whether it is made by a single person, a number of people, an expert, a group or an organisation.
- 6.5.17 In response to the corridor consultation in 2015, we decided to extend our study area south of Mosssdale to allow us to consider alternative route options during this phase of the routeing and consultation process. This decision was explained in our consultation report published in July 2016, which drew to a close the consultation on corridor options. Although the extended corridor included a number of properties in the west of Laurieston Forest, which were not previously covered in the direct mailing of literature for the first round, it was covered by the media advertising we carried out at both the launch of the public consultation and the publication of the report, both of which received extensive coverage. We extended our direct mailing in the second round of consultation to include the extended area plus a further 1km buffer. As the corridor consultation had been concluded, the focus of the leaflet was on the route options.
- 6.5.18 The development of the KTR Project follows a series of iterative steps, starting with defining a corridor of land within which the project could be built, then searching for routes within it and finally looking for detailed alignments and tower locations. No routes had been considered as part of the first round of consultation because we were seeking views on a corridor study area. However, it is worth noting that our preferred route in this area, route 2B, is almost entirely within the consultation zone we used in the first round of consultation and there will be further opportunity to comment on the project as the consultation process continues.
- 6.5.19 Your views are very important to us and there will be a further round of consultation before we submit any plans as part of the applications for section 37 consent. After that, the Scottish Government will conduct an additional formal statutory consultation process during which people will be encouraged to make comments directly to the decision-making authority.
- 6.5.20 Following the close of our first round of consultation, the future needs of the transmission network changed and we carried out a cost-benefit analysis with National Grid, the GB Transmission System Operator, to make sure our proposals were the most efficient and economical. Although we published our consultation report in a timely manner in February 2016, we were not able to publish our conclusions until July 2016, resulting in the publication of an updated consultation report. While this resulted in a significant change to the scope of the project, the change was a reduction on the original. Following a review of our consultation strategy, as detailed in 6.5.7 to 6.5.9, we considered that the reduced scope, complexity and geographical area of the KTR Project, as well as the fact that many aspects of the project were now quite well known, a duration of eight weeks, with an additional three-week allowance for the receipt of feedback over Christmas, to be appropriate.

## Consultation materials and exhibitions

- 6.5.21 Two inaccuracies relating to missing information were pointed out in the routing materials.
- 6.5.22 The opportunity to visualise potential views of a line along the preferred routes using computer simulations was considered useful by several respondents. There was an opposing view by one respondent who felt the images had been faded out and were not truly representative. This person also felt simulations should have been prepared for alternative routes SPEN considered.
- 6.5.23 Several people commented that more information should have been provided regarding SPEN's proposed work at substations, including possible extensions to some substations, for instance their size, capacity, and how construction might impact on local traffic.
- 6.5.24 There were comments about the level of information provided regarding the increase in the height of towers and the impact this would have. This included a view that the diagram used in consultation materials was misleading in that it minimised the height difference and failed to convey that the majority of the new towers would be significantly larger than the existing.
- 6.5.25 While many people complimented staff at the public exhibitions for their expertise and knowledge, there was an alternative view expressed that there was a lack of personal knowledge of the area by members of the project team.

### SPEN's response

- 6.5.26 Please refer to 6.3.5 for our response on missing information in routing materials.
- 6.5.27 The 3D visualisations were based on the standard design specification for both L7 and L4 tower designs and modelled to include conductors and insulators to give stakeholders an appreciation of what the overhead line might look like relative to the landscape and other features such as roads and properties within the 200m wide preferred route. Tower locations were indicative and not based on a detailed technical design at this stage in the process. The colouration of the towers in the model was set to grey to, as closely as possible, reflect the standard grey finish of typical tower design. During the next round of consultation the 3D model will have more detail in terms of proposed tower locations etc.
- 6.5.28 At this stage in the project design it is too early to be precise about the exact dimensions of substation extensions or areas required for construction, including construction traffic etc. However, SPEN will be undertaking more detailed surveys and assessments over the coming months and further detail will be provided in relation to proposed changes at substations in the next round of consultation.
- 6.5.29 The purpose of the tower and pole diagrams used in the exhibition display boards was to give people an appreciation of the proposed structures relative to the existing towers. These diagrams were drawn to scale in order to achieve this aim. However, we have noted an error in how the trident wood pole was presented in these diagrams. This was shown as being 15m in height; however, this also included the planting depth of the pole below ground. The standard trident height above ground (including height of steelwork and insulator supports) is approximately 12m, depending on the planting depth of the pole. An updated scale diagram has been included in **Appendix W**.

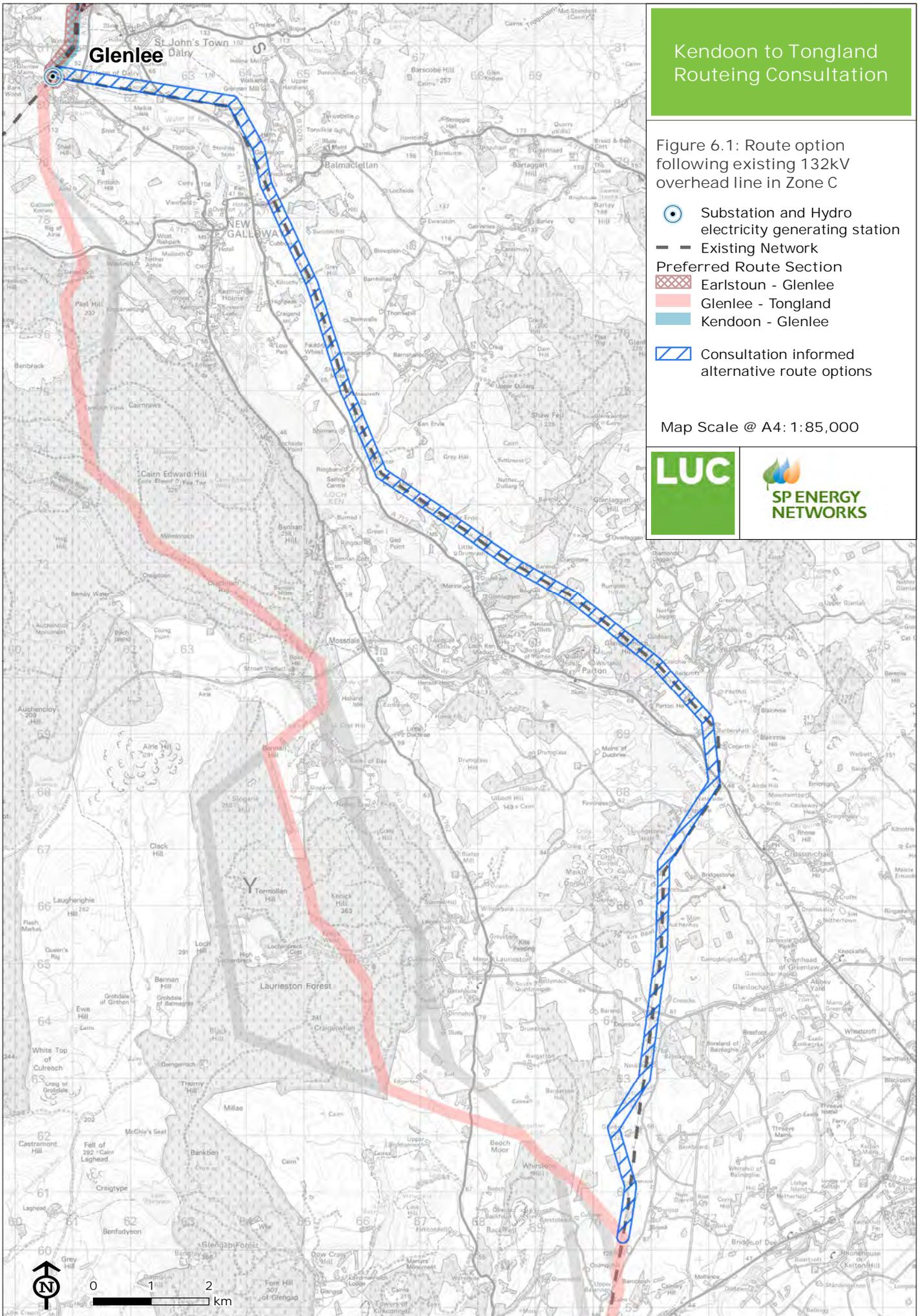
- 6.5.30 We had a varied cross-section of experts at exhibitions ranging from the environmental and technical to consultation and engagement. While this provided the maximum capability for answering queries, by the nature of their individual involvement, some people had more local knowledge than others. Although we are confident that the level of expertise and knowledge in the room was appropriate, as it was praised by many respondents, there is always new information for us to glean, which is why public consultation is so important.

#### **Suggestions for future rounds of consultation**

- 6.5.31 There was a comment from a small number of respondents who arrived early to the Kirkcudbright event that event opening times should be displayed more prominently in consultation materials.

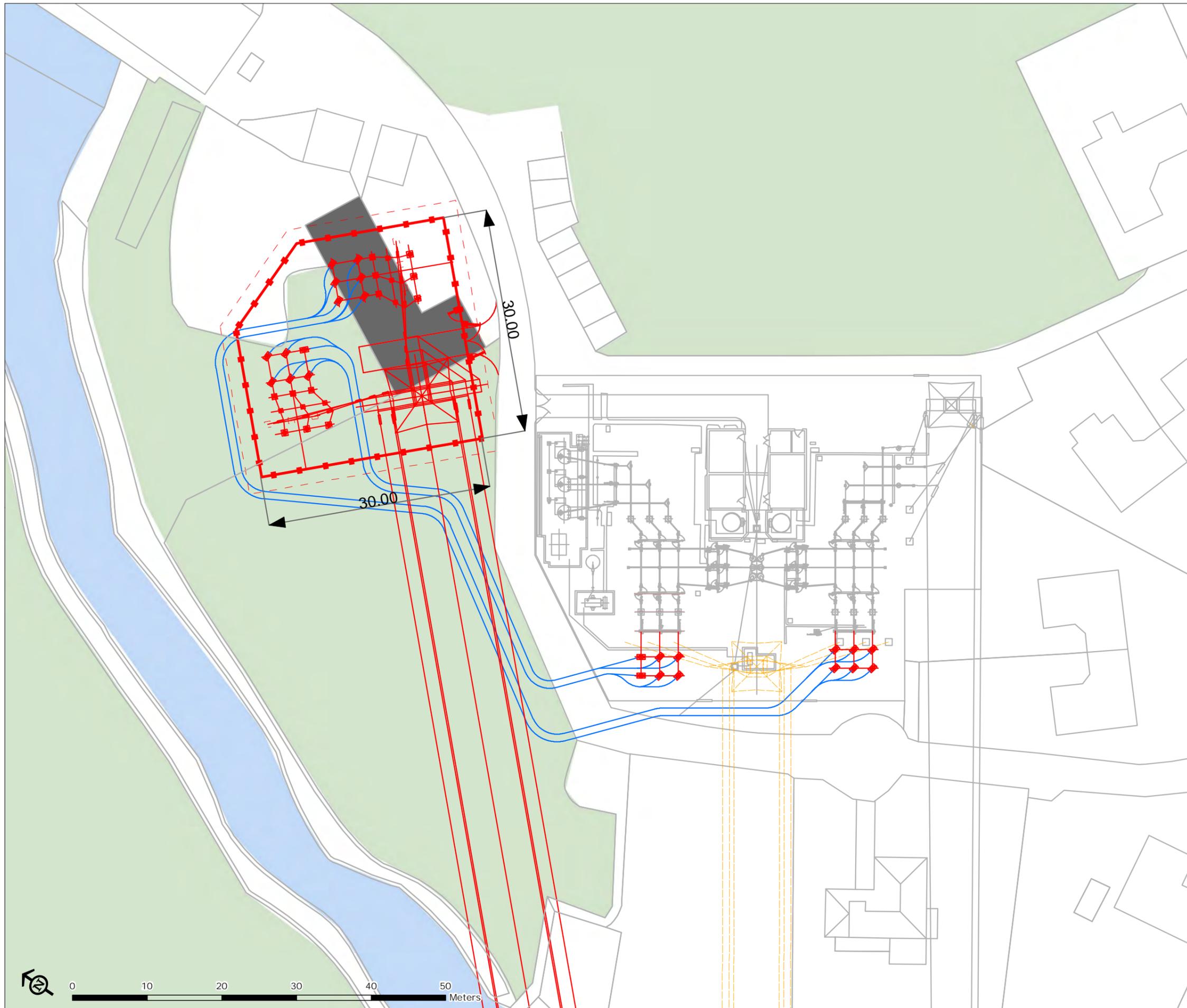
#### SPEN's response

- 6.5.32 We welcome all comments on the consultation process and materials and will take them into account when drawing up the strategy for the next round of consultation, which is expected later in 2017.

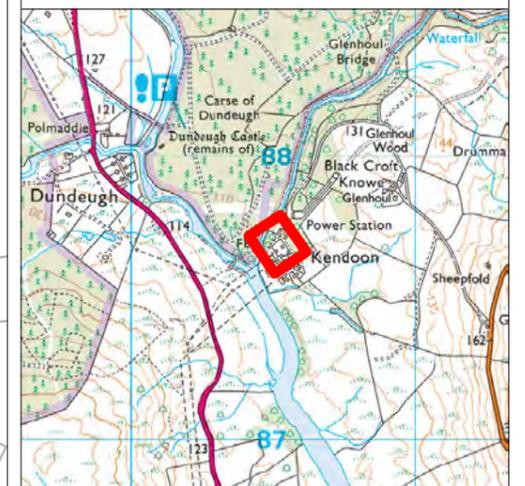


# Kendoon to Tongland Routeing Consultation

Figure 6.2: Option for re-location of terminal tower at Kendoon substation



-  Pallisade Fence
-  New infrastructure
-  2m wide walkway surrounding compound
-  New 132kV underground cables
-  Existing Infrastructure
-  Existing infrastructure to be removed
-  Existing Social and Recreation Hall (to be removed)
-  Existing woodland
-  Water of Ken



Map Scale @ A3: 1:500





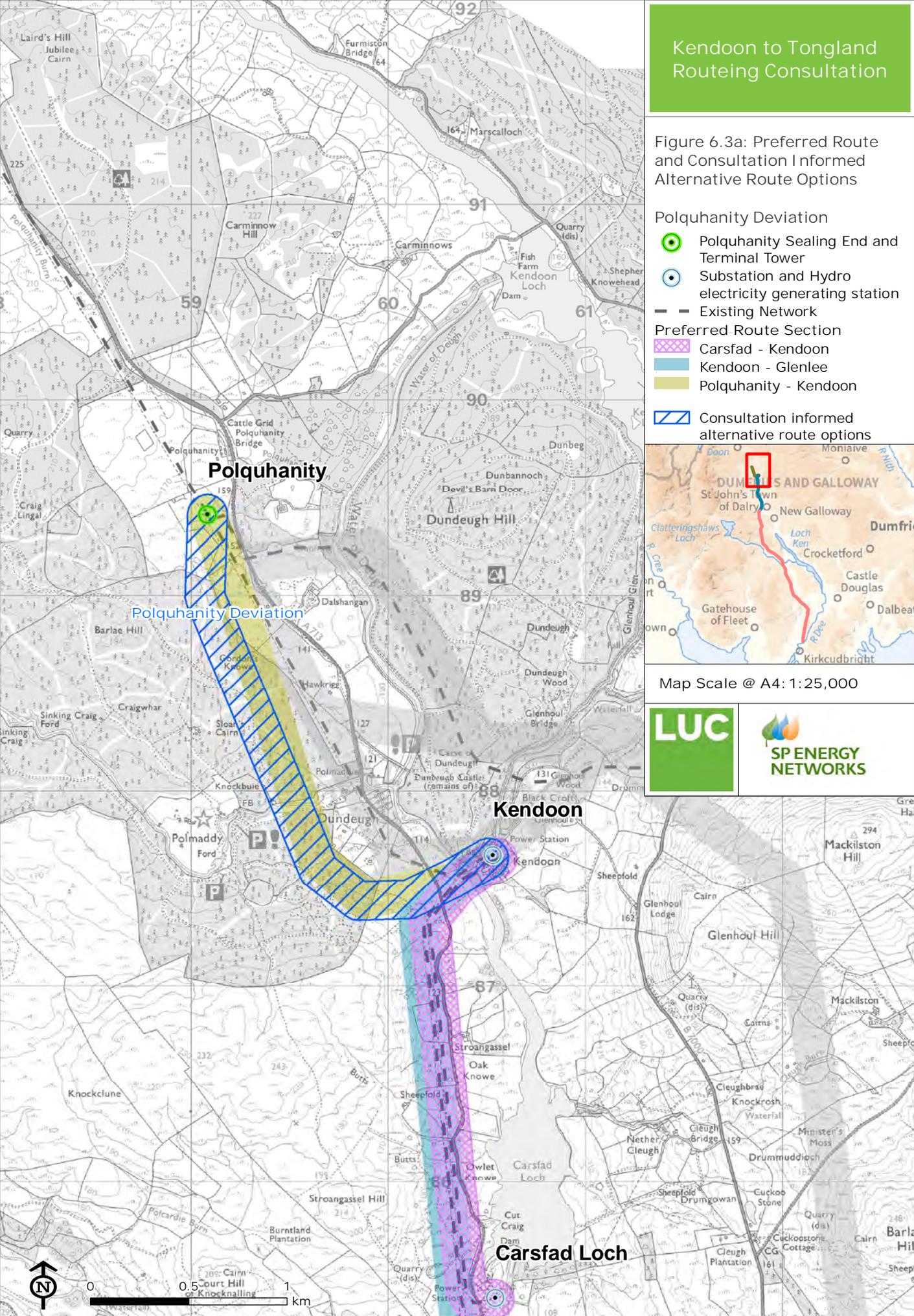
# Kendoon to Tongland Routing Consultation

Figure 6.3a: Preferred Route and Consultation Informed Alternative Route Options

- Polquhany Deviation**
- Polquhany Sealing End and Terminal Tower
  - Substation and Hydro electricity generating station
  - Existing Network
- Preferred Route Section**
- Carsfad - Kendoon
  - Kendoon - Glenlee
  - Polquhany - Kendoon
- Consultation informed alternative route options



Map Scale @ A4: 1:25,000

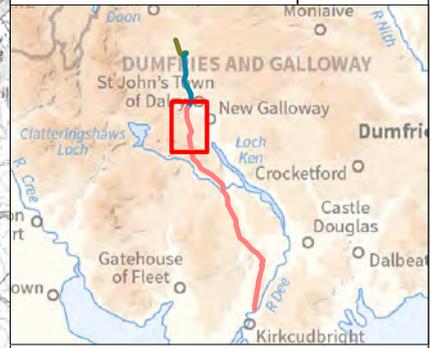


# Kendoon to Tongland Routing Consultation

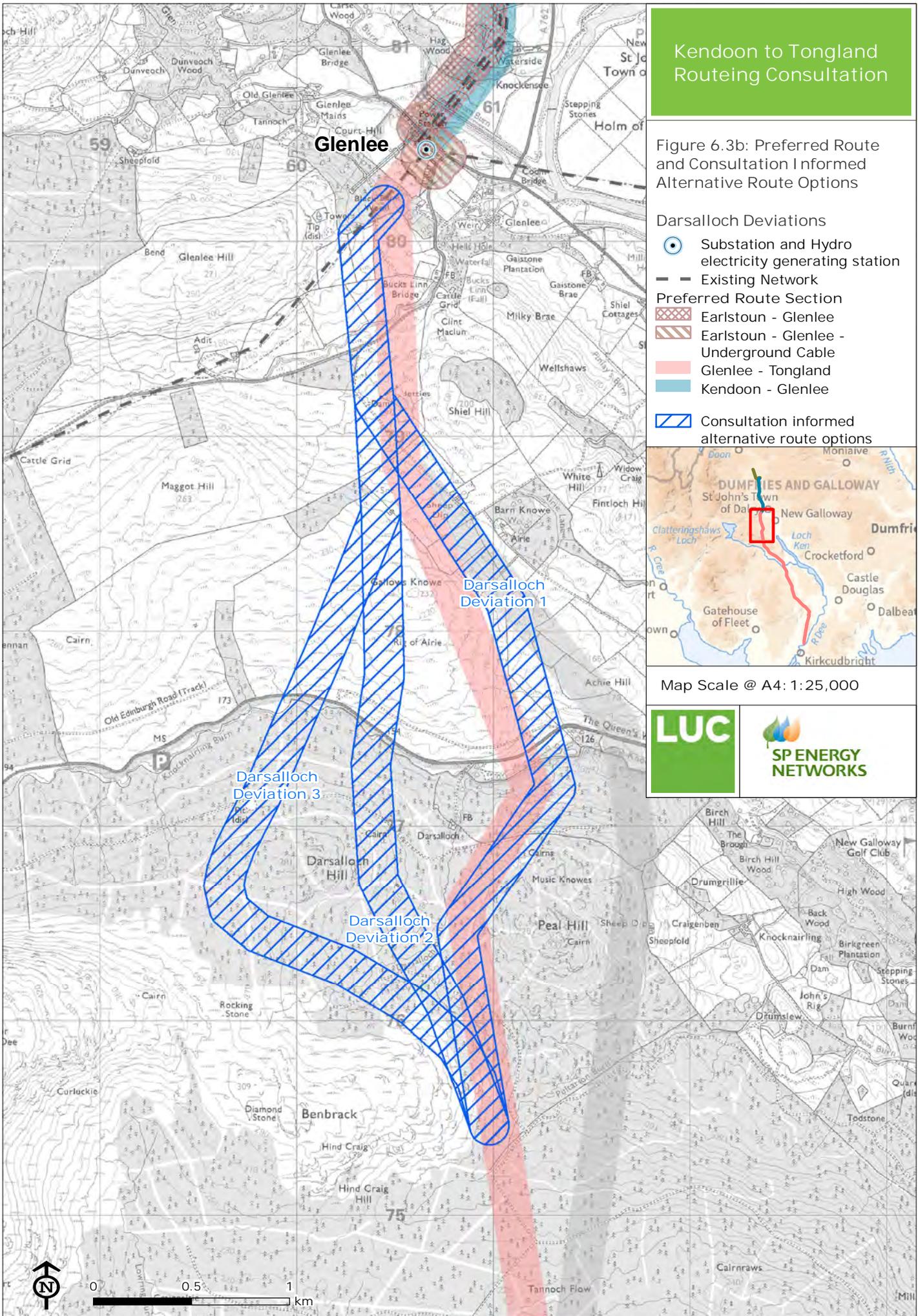
Figure 6.3b: Preferred Route and Consultation Informed Alternative Route Options

## Darsalloch Deviations

-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred Route Section
-  Earlstoun - Glenlee - Underground Cable
-  Glenlee - Tongland
-  Kendoon - Glenlee
-  Consultation informed alternative route options



Map Scale @ A4: 1:25,000

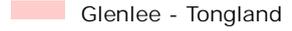


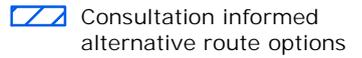
# Kendoon to Tongland Routing Consultation

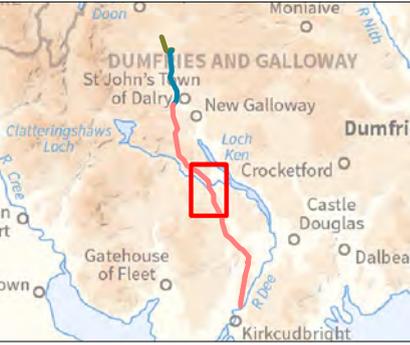
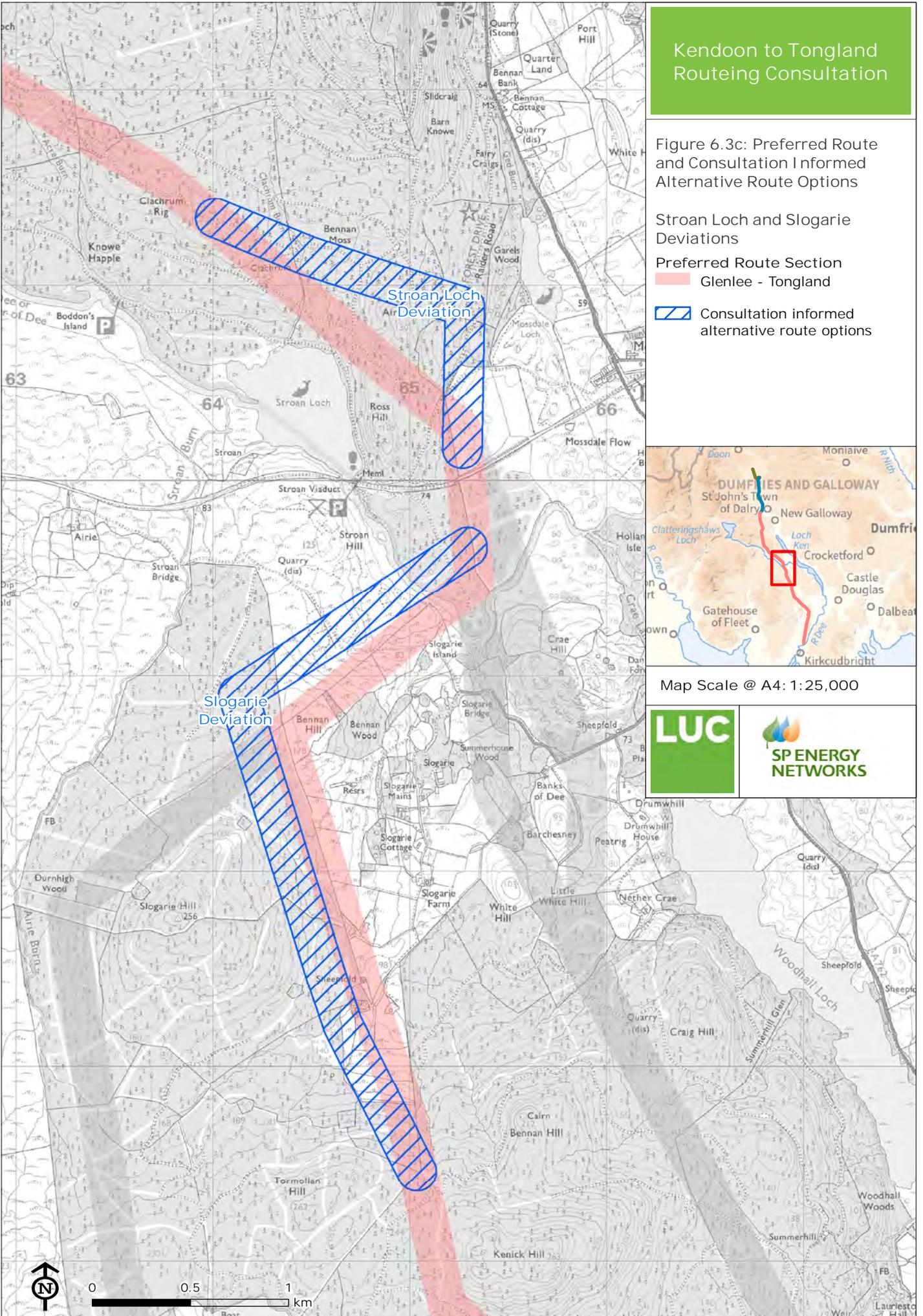
Figure 6.3c: Preferred Route and Consultation Informed Alternative Route Options

Stroan Loch and Slogarie Deviations

Preferred Route Section

 Glenlee - Tongland

 Consultation informed alternative route options



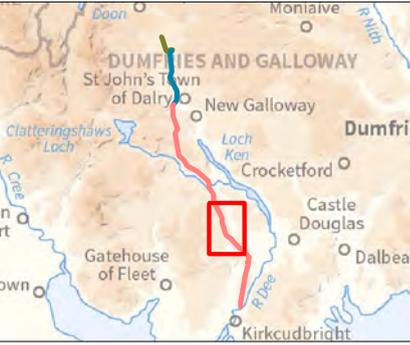
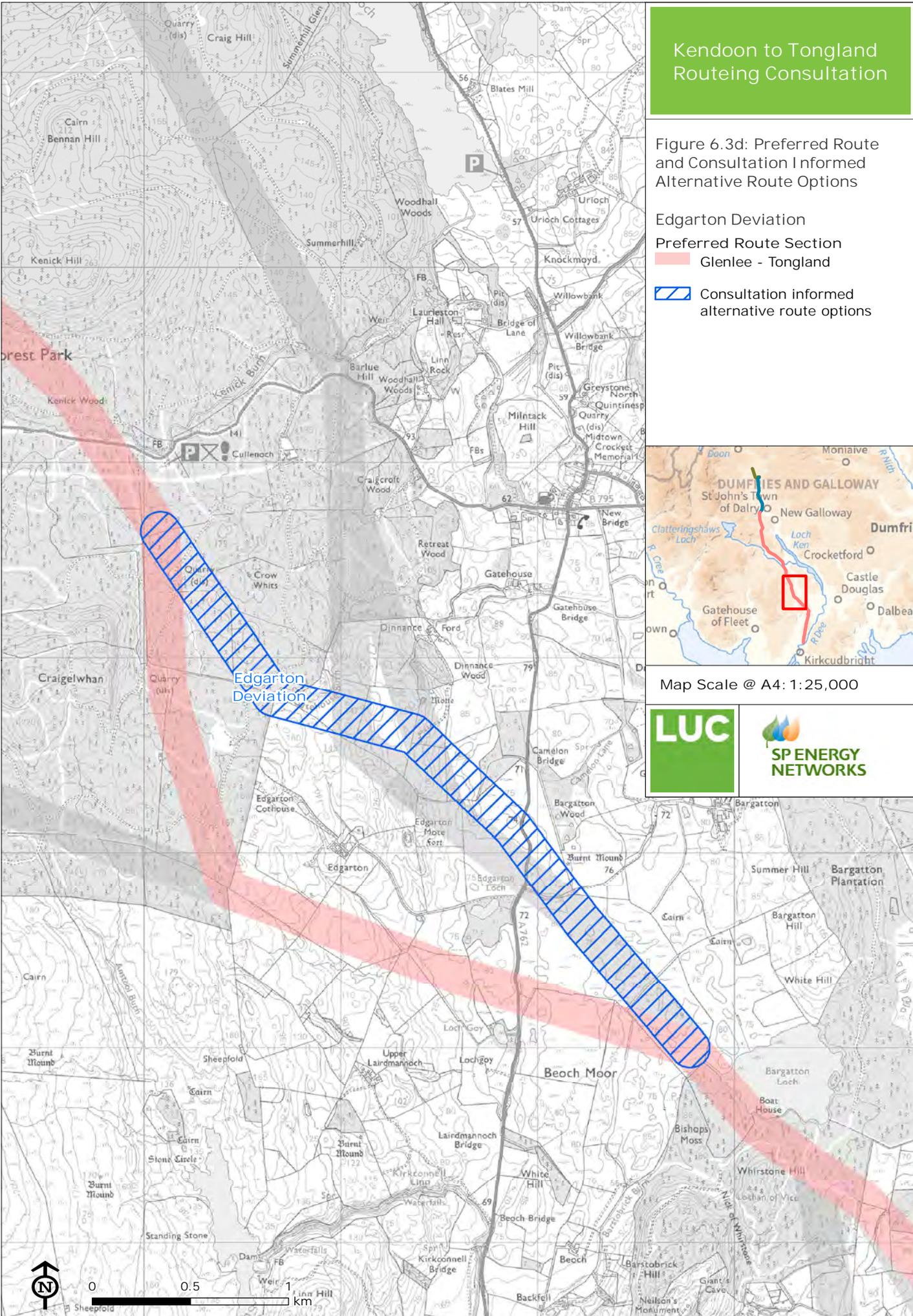
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# Kendoon to Tongland Routing Consultation

Figure 6.3d: Preferred Route and Consultation Informed Alternative Route Options

- Edgarton Deviation
- Preferred Route Section
  - Glenlee - Tongland
  - Consultation informed alternative route options



Map Scale @ A4: 1:25,000



## 7 Evaluation of consultation with members of the public

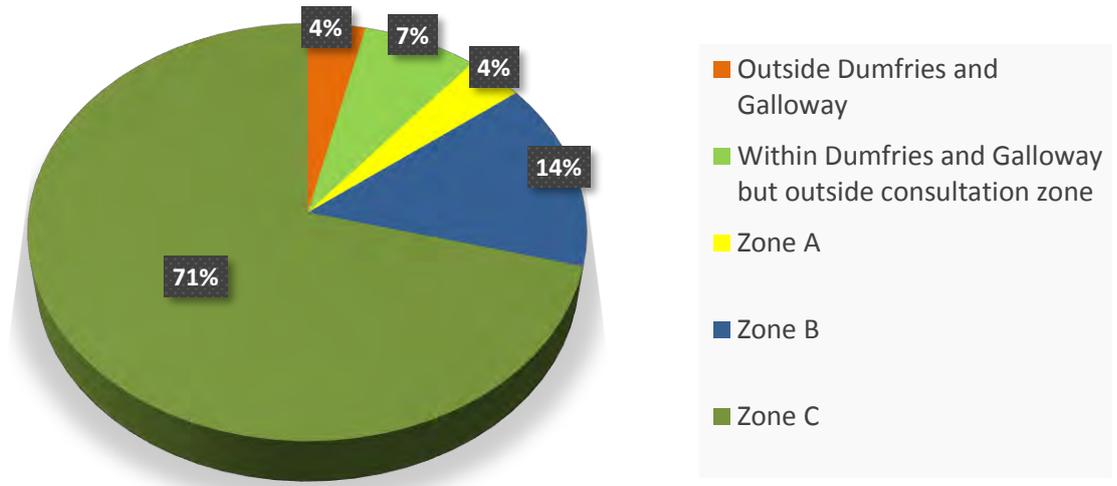
### 7.1 Overview

- 7.1.1 The information in this chapter relates to monitoring information about locations and ages of respondents gathered from the official feedback forms returned by members of the public. It was not obligatory for respondents to provide this data and not all respondents did. It can be useful in formulating strategies for future rounds of consultation to ensure information reaches all sections of the community effectively and encourages as many people as possible to participate.
- 7.1.2 Please refer to Chapter 3 for details of consultation with other groups of stakeholders. Monitoring information was not requested or provided by these groups.

### 7.2 Participants

- 7.2.1 A total of 186 visits were recorded to the public consultation events. **Appendix T** details the number of attendees to each consultation event. During the second round of consultation (17 October 2016 until 13 January 2017), the website received 1,547 visits.
- 7.2.2 These figures represent a very small proportion of those people made aware of the Kendoon to Tongland 132kV Reinforcement (KTR) Project through leaflets, letters, local adverts, posters 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 about the proposals 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.
- 7.2.3 An 'About You' section on the KTR 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 second round of consultation. The data collected included names/organisations, addresses, email addresses and age categories.
- 7.2.4 Monitoring information is particularly useful in helping SPEN assess which sectors of the wider community took part, and, where it relates to members of the public, could help improve the reach and penetration of future rounds of consultation.
- 7.2.5 From the feedback received, 54 responses supplied postcodes or other information, enabling their location to be tracked. All but five of these respondents were located within the consultation zones. The locations of all respondents (where given) relative to the consultation zones are shown in Chart 7.1.

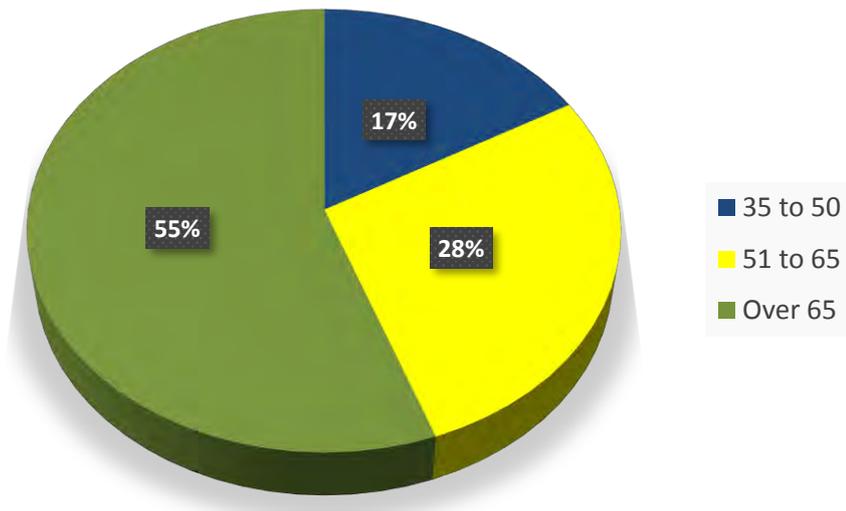
**Chart 7.1 Locations of respondents by consultation Zone (where given)**



7.2.6 Further analysis of postcodes suggests the largest concentrations of respondents around Laurieston (postcodes starting DG7 2P) where 12 of these items originated and Mossdale (postcodes starting DG7 2N) where 11 items originated.

7.2.7 From the feedback forms received, 36 people identified their age group. The breakdown is shown in Chart 7.2 below.

**Chart 7.2 Ages of respondents to the second round of consultation (where given)**



## **7.3 Ongoing consideration of feedback**

- 7.3.1 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.
  
- 7.3.2 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 a future round of consultation.

## 8 SPEN's conclusions following the second round of consultation

### 8.1 Overview

- 8.1.1 SPEN has reviewed and considered in detail all feedback received from the public, consultee bodies and local interest groups in relation to the second round of consultation.
- 8.1.2 The feedback received has informed SPEN's review of the Kendoon to Tongland 132kV Reinforcement (KTR) Project with regard to the following:
- The views of respondents on the project as a whole, including the routeing methodology;
  - The views of respondents on the routes proposed by SPEN;
  - Information on the local area, including areas used for recreation, local environmental features, and any existing plans for new developments within the preferred routes; and
  - Views on how the rounds of consultation have been conducted.
- 8.1.3 This chapter outlines the conclusions on the feedback received and explains the next steps.

### 8.2 Need and approach

- 8.2.1 While there was general support for the need for the project, there were numerous comments on SPEN's approach including the choice of study area (preferred corridor) in Zone C, and the possibility of undergrounding or routeing the new electricity connection under Loch Ken. These comments are presented in Chapter 6 and **Appendices A to E**.

### 8.3 Routeing

- 8.3.1 As outlined in Chapter 2, SPEN's overarching objective for the Kendoon to Tongland 132kV Reinforcement (KTR) Project is:
- "To identify a technically feasible and economically viable route for a continuous 132kV overhead line connection supported on lattice steel towers from Polquhanity to Kendoon, from Kendoon to Glenlee, and from Glenlee to Tongland. The project is also required to identify new 132kV overhead line connections supported on Trident wood poles from Carsfad to Kendoon, and from Earlstoun to Glenlee. The routes should, on balance, cause the least disturbance to the environment and the people who live, work and enjoy recreation within it."*

- 8.3.2 In relation to route selection, as outlined in Chapter 6, a number of feedback responses were received from the public, consultee bodies and local interest groups suggesting either:
- A preference for the SPEN preferred route in a particular location;
  - A preference for an alternative route identified by SPEN;
  - Suggested modifications to a route identified by SPEN; or
  - Suggestions for new routes.
- 8.3.3 SPEN and its planning and environmental advisers reviewed each of these suggestions in detail against:
- The overarching KTR Project routeing objective; and
  - The methodology for the identification and appraisal of corridors, as set out in the *KTR Project: Routeing and Consultation Document (October 2016)*.
- 8.3.4 Where feedback suggestions conflicted with the project objective and/or the methodology, these have not been taken forward by SPEN. The explanation for this is set out in Chapter 6, section 6.4.
- 8.3.5 Where feedback suggestions outlined modifications to the current preferred routes SPEN carried out further detailed appraisal following the same criteria as outlined in the *Routeing and Consultation Document (October 2016)*. Seven suggested route deviations were identified and taken forward to appraisal, as follows:
- Zone A deviations considered**  
Polquhanity
- Zone C deviations considered**  
Darsalloch 1  
Darsalloch 2  
Darsalloch 3  
Stroan Loch  
Slogarie  
Edgarton
- 8.3.6 Maps of the seven proposed deviations which were subjected to appraisal are shown in Chapter 6, **Figures 6.3a-d**. Descriptions of the routes together with the findings of the appraisals are detailed in **Appendix U**.
- 8.3.7 In addition, in response to feedback received by the public, a route option was identified for Zone C which follows, where possible, the route of the existing 132kV overhead line to the east of Loch Ken. This route was subjected to appraisal using the same criteria as the SPEN route options. An overview map of this route is shown in Chapter 6, Figure 6.1. Detailed maps of this route together with findings of the appraisal and our conclusions are contained in **Appendix V**.

- 8.3.8 Following appraisal it was found that a number of the deviations suggested in the consultation feedback were viable options for routeing. These are being taken forward by SPEN to the next stage of the routeing process, and have resulted in route modifications near Polquhanity, Darsalloch, Stroan Loch, Slogarie and Edgarton (as described in Chapter 6 and collated in section 8.4 below).
- 8.3.9 No specific comments were received about the preferred routes for new single-circuit wooden pole connections between Carsfad and Kendoon and between Earlstoun and Glenlee.

## 8.4 Confirmation of proposed routes

- 8.4.1 An overview of the proposed route is shown on **Figure 8.1**.

### **Zone A: Polquhanity to Kendoon (see Figure 8.2a)**

- 8.4.2 The preferred route B has been selected as SPEN's proposed route for the 132kV overhead line between Polquhanity and Kendoon substation. However, in response to the second round of consultation, SPEN has moved the northern part of the route slightly further westwards into the forest near Polquhanity.

### **Zone B: Kendoon to Glenlee (see Figure 8.2b)**

- 8.4.3 The preferred route A has been selected as SPEN's proposed route for the 132kV overhead line between Kendoon substation and Glenlee substation. This has not altered following consultation.
- 8.4.4 The preferred routes for wooden pole connections from Carsfad to Kendoon and from Earlstoun to Glenlee have been confirmed as the proposed routes for these connections.

## **Zone C: Glenlee to Tongland (see Figures 8.2c-e)**

8.4.5 As described in Chapter 6, due to length Zone C was considered in five sections. The preferred route consisting of sections 1A/2B/3C/4A/5B had been selected as SPEN's proposed route for the 132kV overhead line between Glenlee substation and Tongland substation. However, in response to the feedback from the public and consultees to the second round of consultation, SPEN has modified several sections of this route:

1. Section 1A has been modified to pass east of Darsalloch Hill, increasing the distance and reducing associated residential visual amenity effects on the property at Darsalloch, as well as minimising loss of woodland;
2. Section 2B has been modified in three areas:
  - One minor deviation north of Stroan Loch is proposed which moves the route slightly north-eastwards, but not as far as suggested in the feedback to avoid increasing visibility of the route from properties at Mossdale;
  - A second deviation north-west of Slogarie takes advantage of forestry on the eastern slopes of Slogarie Hill, to reduce visibility of the overhead line from residential properties without compromising the ornithological constraints to the west;
  - The third deviation passes north of the properties at Edgarton, to avoid the principal outlook from these properties.

8.4.6 On this basis SPEN's proposed routes are shown in overview on the map in **Figure 8.1** and by Zone in **Figures 8.2a-e**.

## **8.5 Consultation process**

8.5.1 SPEN has listened carefully to the comments and suggestions about the process of the second round of consultation. As a result, a number of changes will be considered as part of the consultation strategy for the third round of consultation. This strategy will be discussed and agreed with the Statutory Stakeholder Liaison Group (SSLG) and the Community Liaison Group (CLG).

8.5.2 Proposed changes to the consultation strategy for the third round of consultation will include:

- Further clarification on the scale and possible design of potential new structures will be provided in the next round of consultation;
- Further clarification on the work to be carried out at substations will be provided in the next round of consultation;
- We will use 3D visualisations to provide greater clarity on the visual and cumulative effect of new lines from key viewpoints;
- Changes to routes or study areas resulting from the second round of consultation will be given greater prominence in future consultation materials; and
- Timings of exhibitions will be made more prominent in consultation materials.

## 8.6 Next steps

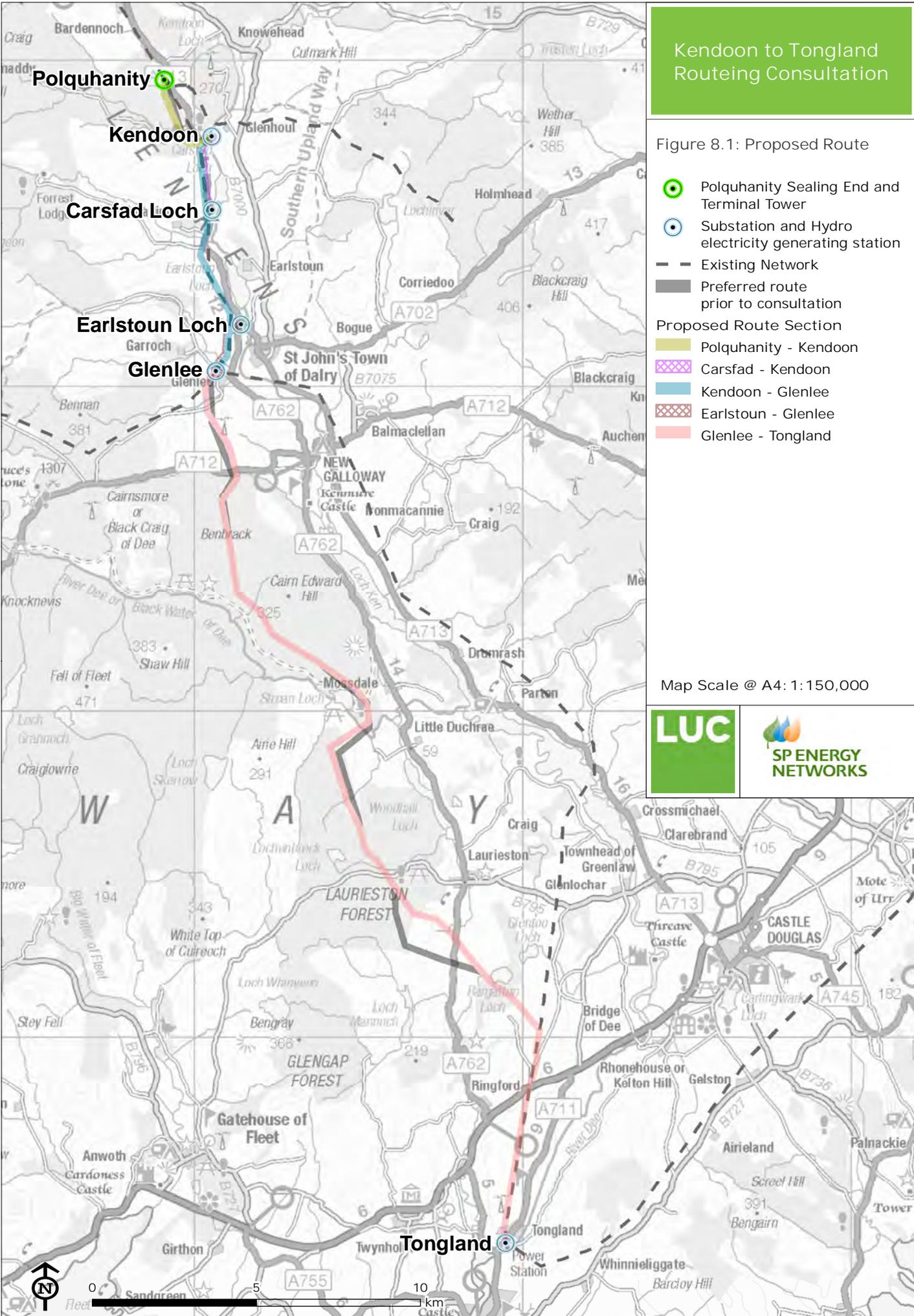
- 8.6.1 The next stage of the routeing process is the detailed route alignment stage, comprising desk and field environmental and technical surveys to identify locations for towers, wooden poles and associated infrastructure.
- 8.6.2 This stage will culminate in the identification of preferred alignments and tower and wooden pole locations for the KTR Project. Information collated from feedback received as part of the first and second rounds of consultation which relates to regionally and locally important areas and features will be reflected in the methodology where relevant.
- 8.6.3 Following the identification of preferred alignments and tower locations, SPEN will hold a third round of consultation to gather feedback on both the preferred alignment and tower locations and the contents of the Environmental Statement (ES).
- 8.6.4 The work carried out in this stage of the routeing process, together with the process for consulting on it, will be explained in documentation accompanying the third round of consultation.
- 8.6.5 Responses to the third round of consultation will be used to review and test the conclusions of this process on these preferred alignments and tower locations. Following the conclusion of this review, SPEN will confirm the proposed alignment upon which the Environmental Impact Assessment will be undertaken, the findings of which will be presented in the Environmental Statement to be submitted alongside the section 37 applications to Scottish Ministers.
- 8.6.6 Following the submission of SPEN's application, further public consultation will be carried out by the Scottish Government before any decision is made.

# Kendoon to Tongland Routing Consultation

Figure 8.1: Proposed Route

-  Polquhany Sealing End and Terminal Tower
-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred route prior to consultation
- Proposed Route Section**
-  Polquhany - Kendoon
-  Carsfad - Kendoon
-  Kendoon - Glenlee
-  Earlston - Glenlee
-  Glenlee - Tongland

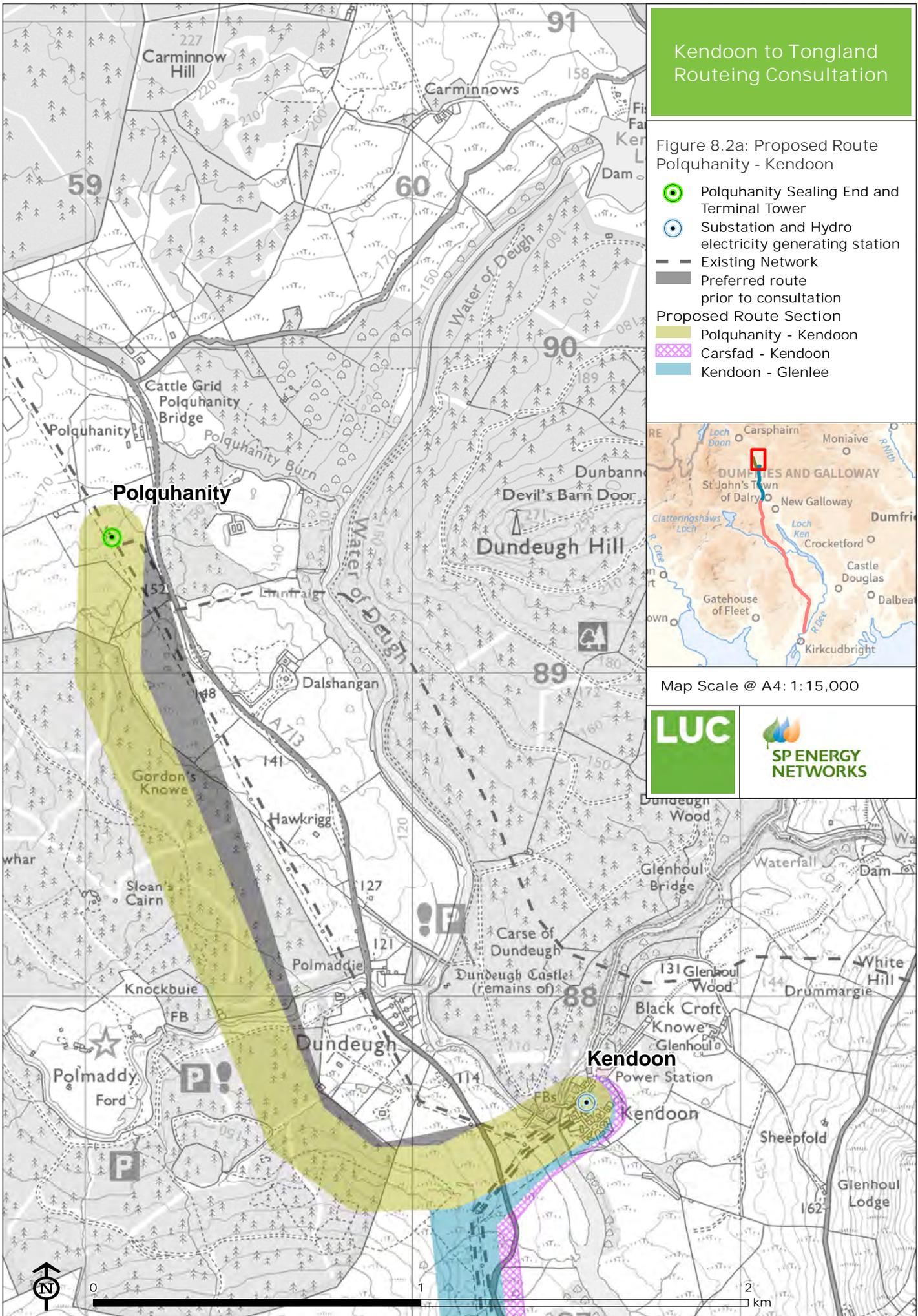
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# Kendoon to Tongland Routing Consultation

Figure 8.2a: Proposed Route  
Polquhanity - Kendoon

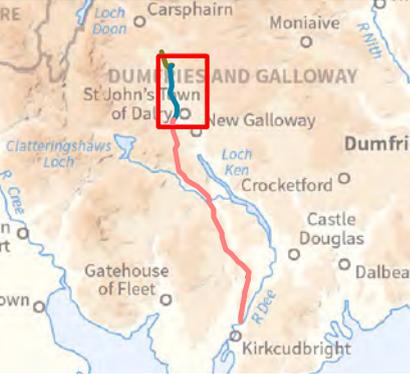
-  Polquhanity Sealing End and Terminal Tower
-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred route prior to consultation
-  Proposed Route Section
-  Carsfad - Kendoon
-  Kendoon - Glenlee



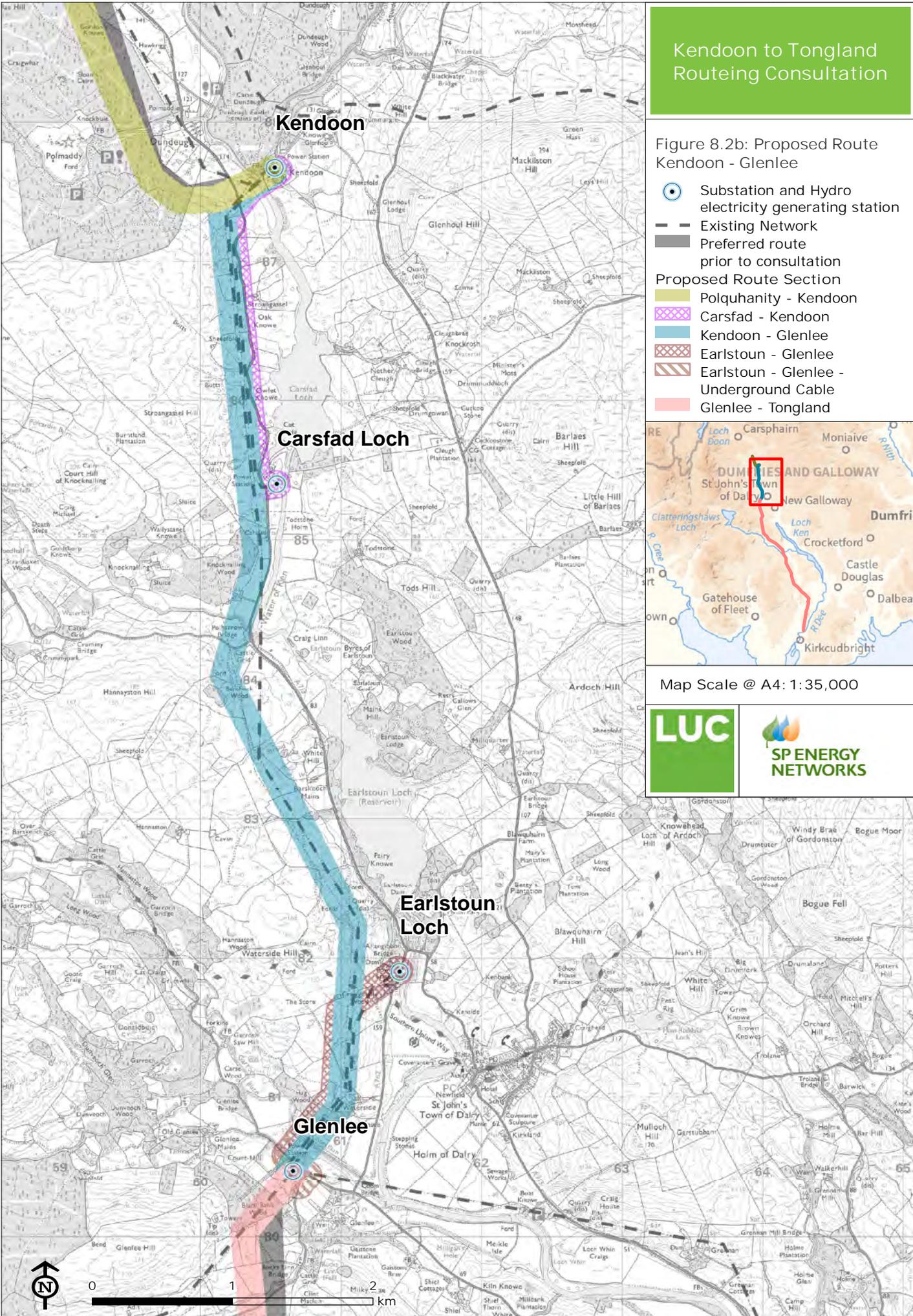
# Kendoon to Tongland Routing Consultation

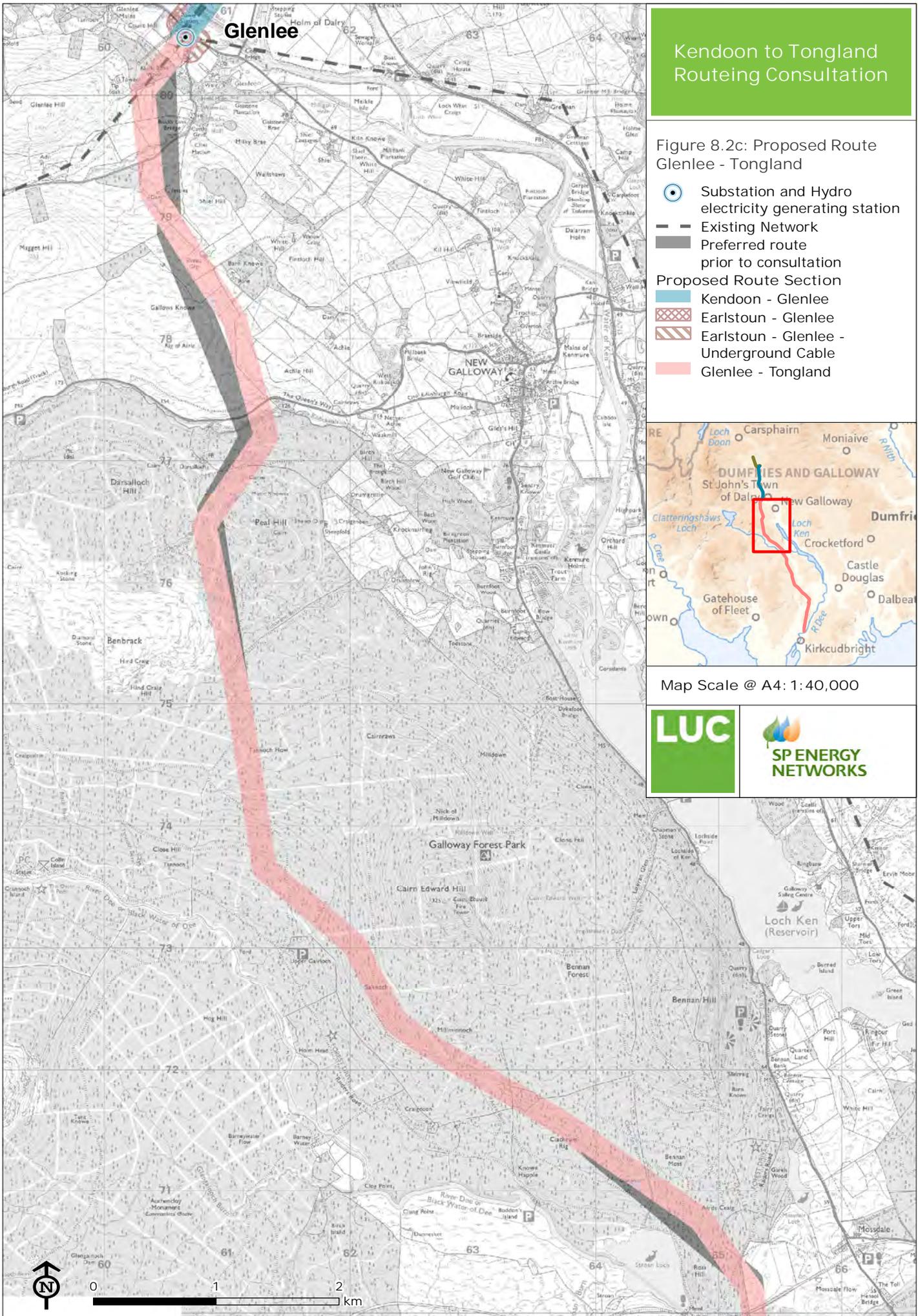
Figure 8.2b: Proposed Route  
Kendoon - Glenlee

-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred route prior to consultation
- Proposed Route Section**
-  Polquharity - Kendoon
-  Carsfad - Kendoon
-  Kendoon - Glenlee
-  Earlstoun - Glenlee
-  Earlstoun - Glenlee - Underground Cable
-  Glenlee - Tongland



Map Scale @ A4: 1: 35,000

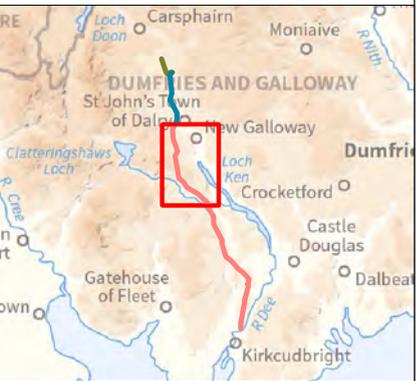




# Kendon to Tongland Routing Consultation

Figure 8.2c: Proposed Route  
Glenlee - Tongland

-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred route prior to consultation
- Proposed Route Section**
-  Kendon - Glenlee
-  Earlstoun - Glenlee
-  Earlstoun - Glenlee - Underground Cable
-  Glenlee - Tongland



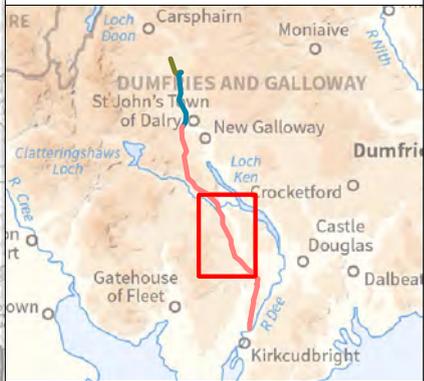
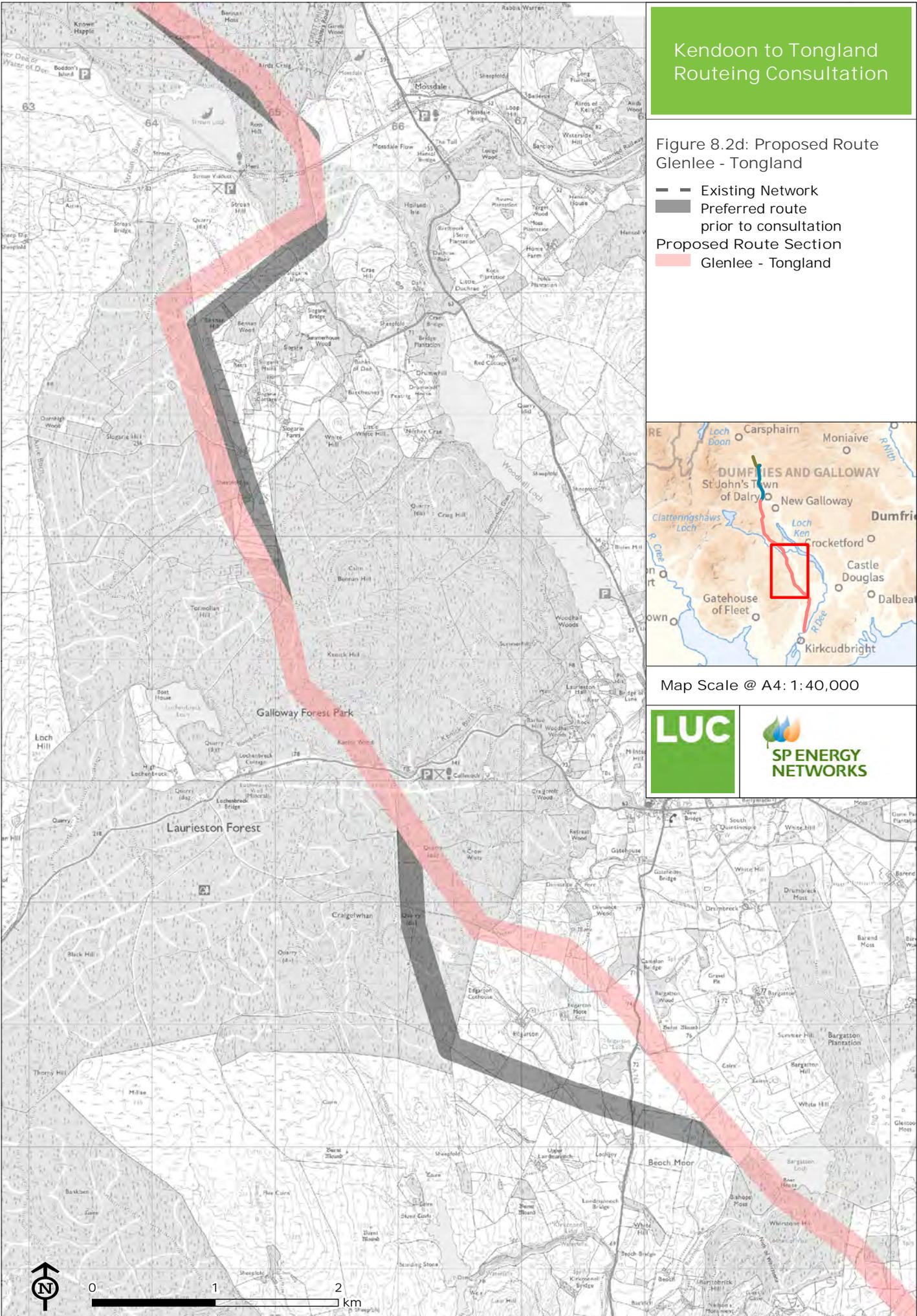
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# Kendoon to Tongland Routing Consultation

Figure 8.2d: Proposed Route  
Glenlee - Tongland

-  Existing Network
-  Preferred route prior to consultation
-  Proposed Route Section  
Glenlee - Tongland



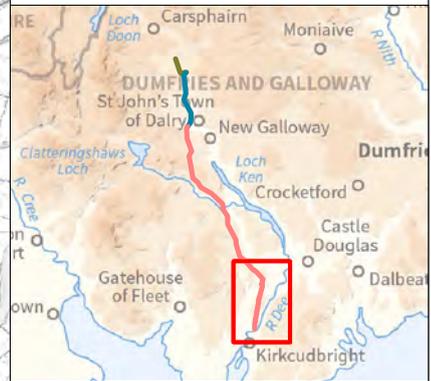
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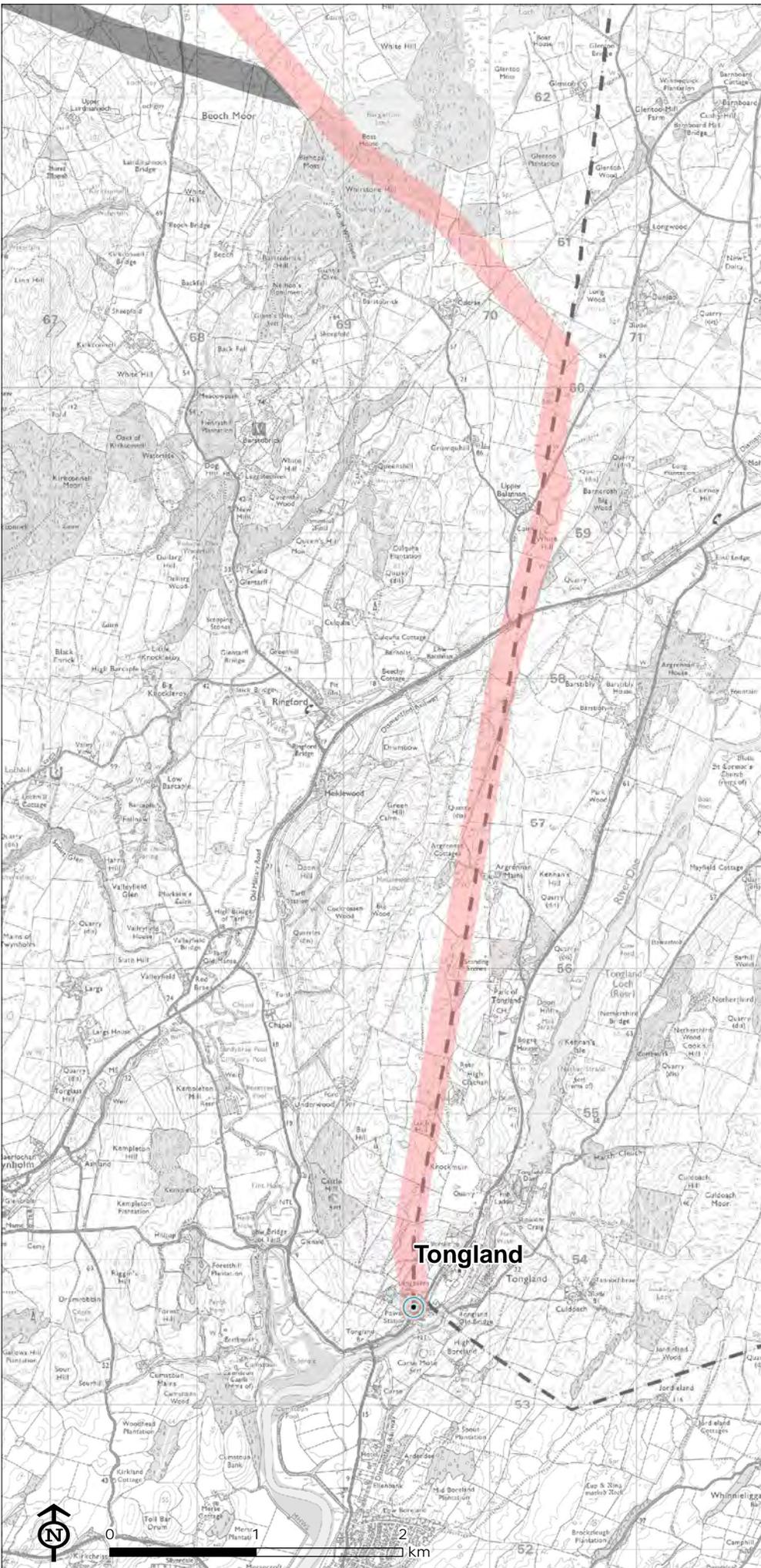
# Kendoon to Tongland Routing Consultation

Figure 8.2e: Proposed Route  
Glenlee - Tongland

-  Substation and Hydro electricity generating station
-  Existing Network
-  Preferred route prior to consultation
-  Proposed Route Section  
Glenlee - Tongland



Map Scale @ A4: 1:40,000



## 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 and semi-natural woodland (ASNW):** Woodland that has existed continuously since at least AD 1600 which is mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.

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

**Cable sealing end (CSE) compound:** The compounds where overhead lines and underground cables connect to each other.

**Community Liaison Group (CLG):** A group set up to provide a forum for community representatives, SPEN and the Scottish Government to discuss local issues and concerns relating to the KTR Project.

**Conductors:** The wires that carry the electricity between the towers.

**Consultation Strategy:** A strategy for public consultation, which is based upon planning principles for a National Development for overhead transmission lines (in Scotland) and current Government guidance, to involve local authorities, communities and statutory consultees in project development for the benefit of all parties.

**Consultation zone:** An area most likely to be directly affected by the project within which postal residential and business are contacted directly to encourage participation in the consultation. The consultation zone for the Kendoon to Tongland Reinforcement (KTR) Project consisted of the study area for potential line routes plus a buffer approximately 1km either side.

**Corridor:** A swathe of land between two substations, identified following technical and environmental considerations, comprising the study area for potential routes for new overhead lines. The corridor for the KTR Project was confirmed following the first round of public consultation.

**Cumulative effect:** Effects which are caused by the combined results of past, current and future activities.

**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 effects; 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 which 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.

**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.

**Interconnected system:** Electricity transmission network consisting of generating stations that produce electrical power, high-voltage transmission lines that carry power from distant sources to demand centres, and distribution lines that connect individual customers.

**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. Will form part of the Environmental Impact Assessment.

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

**Landscape character:** A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.

**Landscape character type (LCT):** Distinct types of landscape that are relatively homogeneous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical land use and settlement pattern and perceptual and aesthetical attributes.

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

**National Grid Electricity Transmission (NGET):** The company which is the GB electricity transmission network System Operator, responsible for operating the over 275kV 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):** An area of outstanding scenic value in a national context.

**Native Woodland Survey of Scotland (NWSS):** The Native Woodland Survey of Scotland, carried out from 2006-2013, in order to establish the first authoritative picture of Scotland's native woodlands.

**Need case:** Document setting out the background requirements and need for extensions/reinforcements to SPEN's electricity transmission system.

**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.

**Pre-application consultation (PAC):** Constructive pre-application discussions between planning authorities, developers, agencies and other bodies who will have to be consulted on any subsequent planning application.

**Preferred route:** A preferred route for a new overhead line which has been identified following technical and environment considerations and which needs to be consulted upon with the public.

**Private water supplies (PWS):** Water supplies which are not provided by the statutory water undertaker (mostly utilities companies), but are the responsibility of their owners and users.

**Proposed route:** The route selected following a review of feedback in the second round of consultation to go forward to the next stage of the routeing process, which is detailed alignment and EIA.

**Ramsar sites:** Wetlands of international importance designated under the Ramsar Convention.

**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):** Areas or sites protect by law to conserve their wildlife or geology.

**Socio-economic impact:** The impacts a development has on community social and economic well-being.

**Special Protection Areas:** Protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

**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 KTR Project's statutory stakeholders to ensure good lines of communication with statutory consultees and discuss the key planning, landscape and environmental matters relating to the project.

**Statutory consultees:** Bodies which must be consulted on certain planning and development consent applications as set out in law.

**Study area:** A broad area, based on the corridor (see above), within which the routeing 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.

**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. Towers can also be referred to as pylons.

**Transmission System Operator:** The company which owns and maintains the electricity transmission network in an area. In Central and Southern Scotland this is SPEN.

**Traffic Management Plan (TMP):** A plan to ensure the effective management of transport operations throughout the construction process.

**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:** An international system unit of electric potential and electromotive force.

**Watt:** A 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, that could limit visibility. ZTVs can be used as part of a Landscape and Visual Impact Assessment (LVIA).