



SP Energy Networks

Report on Consultation

Kennoxhead Windfarm to Coalburn Substation 132kV Overhead Line

Project no.661718

JUNE 2020

RSK



RSK GENERAL NOTES

Project No.: G/P/661718/05/11 Rev00

Title: Report on Consultation
Kennoxhead Windfarm to Coalburn Substation 132kV Overhead Line

Client: SP Energy Networks

Date: 07/06/22

Office: Glasgow

Status: Final

Author Adam Paterson/
Robert Beck

Signature _____

Date: 09/06/22

Project Manager Robert Beck

Signature _____

Date: XXXX

RSK Environment Ltd (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the express agreement of the client and RSK. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report assume that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of RSK and the party for whom it was prepared.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

PREFACE

This report on consultation has been prepared to provide a summary of how Scottish Power Energy Networks (SPEN) have responded to comments from all interested parties on the Preferred Route identified for the proposed 132kV continuous overhead line (OHL) between Kennoxhead Windfarm and Coalburn Substation.

Public consultation events presenting details of the proposals described in this document were held in February 2020, these events were advertised publicly via traditional printed media, social media and through postal notification. Copies of the routeing consultation document and consultation leaflet can be found on the project website at:

https://www.spenergynetworks.co.uk/pages/kennoxhead_wind_farm_grid_connection.aspx

CONTENTS

1	INTRODUCTION.....	1
1.1	Document Purpose.....	1
1.2	Project Background and Need.....	1
1.3	Structure of the Report	1
2	SPEN APPROACH TO ROUTEING	3
2.1	Overview of Routeing Process	3
2.2	Routeing Strategy Methodology	2
2.2.1	Overview	2
2.2.2	Routeing Objective	2
2.2.3	Established Practice for Overhead Line Routeing.....	2
2.2.4	Design Techniques for Forest Management Planning (2014).....	3
2.2.5	Routeing Considerations	3
2.2.6	Economic Considerations.....	3
2.2.7	Technical Considerations	3
2.2.8	Environmental Considerations.....	4
2.3	Consideration of potential effects, technical & environmental routeing options	6
2.3.1	Study Area and Buffer Zone	6
2.3.2	Collection of Background Information	6
3	ROUTE CONSULTATION	8
3.1	Public exhibitions	8
3.2	Public Exhibitions – Public Comments.....	9
3.3	Routeing Consultation Document	12
3.4	Scoping	18
	PROPOSED ROUTE AND NEXT STEPS.....	19
3.5	Summary of Proposed Route	19
3.6	Conclusion	Error! Bookmark not defined.

APPENDICES

APPENDIX 1 – CONSULTEE RESPONSES.....	1
APPENDIX 2 – SCOPING RESPONSES	2
APPENDIX 3 – FIGURES	3

GLOSSARY

132kV	132 Kilovolt capacity of a overhead electricity powerline
AA	Appropriate Assessment
AGOL	ArcGIS Online
AOD	Above Ordnance Datum
ASA	Archaeologically Sensitive Area
BDS	Background Desktop Study
BGS	British Geological Survey
Bing	A heap, especially of metallic ore or of waste from a mine.
BPM	Best Practicable Means
BTO	British Trust for Ornithology
CA	Conservation Area
CIEEM	Chartered Institute of Ecology and Environmental Management
CifA	Chartered Institute for Archaeologists
CTMP	Construction Traffic Management Plan
ECU	Energy Consents Unit (Scottish Government)
EHV	Extra high voltage transmission lines (e.g. 33kV)
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EIA Regulations	The Electricity Works (Environmental Impact Assessment (Scotland) Regulations 2017
Electricity Act	The Electricity Act 1989
EMF	Electromagnetic fields
EMP	Environmental Management Plan
FCS	Forestry Commission Scotland
GDL	Garden and Designated Landscape
GIS	Geographical Information Systems
GSP	Grid Supply Point
GWDTE	Groundwater Dependent Terrestrial Ecosystem
ha	Hectares
HER	Historic Environment Record
HES	Historic Environment Scotland
HHIA	Human Health Impact Assessment
Holford Rules	Guidelines developed in 1959 by Lord Holford which define the principles of route selection for overhead lines which continue to inform transmission line routeing in the UK.
HRA	Habitat Regulation Assessment
HSE	Health, Safety and Environment
HV	High voltage transmission lines (e.g, 11kV)

IBA	Important Bird Areas' includes sites designated or identified for designation as Special. Protection Areas under European Community Directive 79/409 on the Conservation of Wild Birds
IEMA	Institute of Environmental Management and Assessment
Initial Study Area	Broad search area subsequently refined to identify the Route Option Area
kV	Kilovolt capacity of an overhead line
LCT	Landscape Character Type
LCU	Landscape Character Unit
LDP	Local Development Plan
LOD	Limit of Deviation, an area which defines
LPA	Local Planning Authority
LV	Low voltage transmission lines (e.g. 230v)
LVIA	Landscape and Visual Impact Assessment
m	Metres
MLDP	Minerals Local Development Plan
MLRS	Medieval or Later Rural Settlement
NRHE	National Record of Historic Environment
NGR	National Grid Reference
NGT	National Grid Transmission
NTS	Non-Technical Summary
NRHE	National Record of the Historic Environment
NVC	National Vegetation Classification
OHL	Overhead line: an electricity powerline above ground level
OS	Ordnance Survey
PAWS	Plantation on Ancient Woodland Sites
PEA	Preliminary Ecological Appraisal
PIR	Project Inception Report
Planning Application	An application for planning permission under The Town and Country Planning (Scotland) Act 1997
PRA	Preliminary Risk Assessment
Preferred Route	The preferred route identified through the routeing study process, which hasn't been subject to non statutory consultation. Considered to represent the optimum balance between the various environmental and technical considerations
Proposed Route	The final route within which alternative OHL route alignments will delineated and appraised
PRoW	Public Rights of Way
PWS	Private Water Supply
Ramsar Site	A wetland site designated to be of international importance under the Ramsar Convention
Route	Linear area of search within study area, through which a new transmission line could be sited

Route Option Area	Area within which a number of potential route alignments can be identified prior to appraisal
RCD	Routeing Consultation Document
RSPB	Royal Society for the Protection of Birds
SAC	A Special Area of Conservation (SAC) protects one or more special habitats and/or species – terrestrial or marine – listed in the Habitats Directive.
SDP	Strategic Development Plan
Section 37 (s37) application	Application for development consent under section 37 of the Electricity Act 1989
SHETL	Scottish Hydro Electric Transmission Ltd
SM	Scheduled Monument
SEPA	Scottish Environment Protection Agency
SLA	Special Landscape Area
SNH	Scottish Natural Heritage
SPA	Special Protection Areas (SPAs) are selected to protect one or more rare, threatened or vulnerable bird species listed in Annex I of the Birds Directive, and regularly occurring migratory species.
SPEN	Scottish Power Energy Networks
SPG	Supplementary Planning Guidance
SPP	Scottish Planning Policy
SPR	Source-Pathway-Receptor
SPT	Scottish Power Transmission
SSSI	Site of Special Scientific Interest is a statutory designation made by Scottish Natural Heritage under the Nature Conservation (Scotland) Act 2004.
Study Area	The area of land which comprises the area within which route options will be identified and appraised
Trident wood pole	This construction type is nominally known as a “Trident” line due to the appearance of the poles once constructed.
VP	Vantage Point
WoSAS	The West of Scotland Archaeology Service
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Visibility

EXECUTIVE SUMMARY

Scottish Power Energy Networks (SPEN) proposes to construct a new 132 kilovolt (kV) overhead line (OHL) supported by wood poles to connect the Kennoxhead Windfarm to the existing Coalburn substation, approximately 2.5 km northeast of Coalburn, South Lanarkshire. The typical height of the wood poles above ground would range between 10m to 22m and have a typical height of 13m. As the majority of the route is above 200m above ordnance datum (AOD), the OHL will likely require construction using H poles, with a typical span between the poles of around 100m.

The approach to developing and assessing the route options follows SPEN's two stage approach to routeing¹, as follows:

- Stage 1: Development and appraisal of route options to select a preferred route including consultation with key stakeholders and local communities to establish a proposed route.
- Stage 2: Environmental Impact Assessment (EIA) of the proposed route and any associated infrastructure. Confirmation of the proposed route for assessment purposes.

Stage 1 has been completed and a preferred route has been selected which provides a technically feasible and economically viable continuous overhead line between Kennoxhead Windfarm and Coalburn substation whilst taking into consideration environmental, technical and economic constraints. This means that the proposed route would be the one that on balance, causes the least disturbance to the environment and the people who live, work and enjoy outdoor recreation within it. SPEN attach great importance to the effect the work could have on the environment and local communities and are keen to engage with key stakeholders so that views can be taken into account through the development of the project.

This Report on Consultation is part of a suite of documents submitted as part of the planning application and includes a summary of actions taken to consult with local communities, as well as responses taken to this consultation. This document should be considered a live document and will be updated with any relevant details received following the online public information events organised for June 2022.

¹ SP Energy Networks (May 2015) Major Electrical Infrastructure Project: Approach to Routeing and Environmental Impact Assessment, https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_FINAL_20150527.pdf

1 INTRODUCTION

1.1 Document Purpose

Scottish Power Energy Networks (SPEN) proposes to construct a new 132 kilovolt (kV) overhead line (OHL) supported by wood poles to connect the Kennoxhead Windfarm to the existing Coalburn substation, approximately 2.5 km northeast of Coalburn, South Lanarkshire. The typical height of the wood poles above ground would range between 10m to 22m and have a typical height of 13m. As the majority of the route is above 200m above ordnance datum (AOD), the OHL will likely require construction using H poles, with a typical span between the poles of around 100m.

This Report on Consultation is part of a suite of documents submitted as part of the planning application and includes a summary of actions taken to consult with local communities, as well as responses taken to this consultation. This document should be considered a live document and will be updated with comments received from consultees following the online public information events organised for June 2022.

1.2 Project Background and Need

SPEN are legally obliged under the Electricity Act 1989 to provide grid connections to new electricity generating developments and has been approached by the developer for Kennoxhead Windfarm to provide a grid connection to the wider electricity transmission network.

SPT is required under the Electricity Act 1989 and under the terms of its Electricity Supply Licence “to develop and maintain an efficient, co-ordinated and economical system of electricity transmission”. SPEN’s stated view is that wherever practical, an overhead line approach is taken when planning and designing new lines.

As a result, SPEN are proposing to construct a new 132kV overhead line between Kennoxhead Windfarm and Coalburn Substation.

SPEN take the view that the project falls within the scope of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 which implement the requirements of the European Parliament and Council Directive No 2014/52/EU.

1.3 Structure of the Report

The remaining sections of this report are structured as follows:

Section 2 describes the overall SPEN approach to routing

Section 3 describes the comments made from stakeholders during the preferred route consultation period between February and March 2020 and the responses to those and subsequent comments by SPEN.



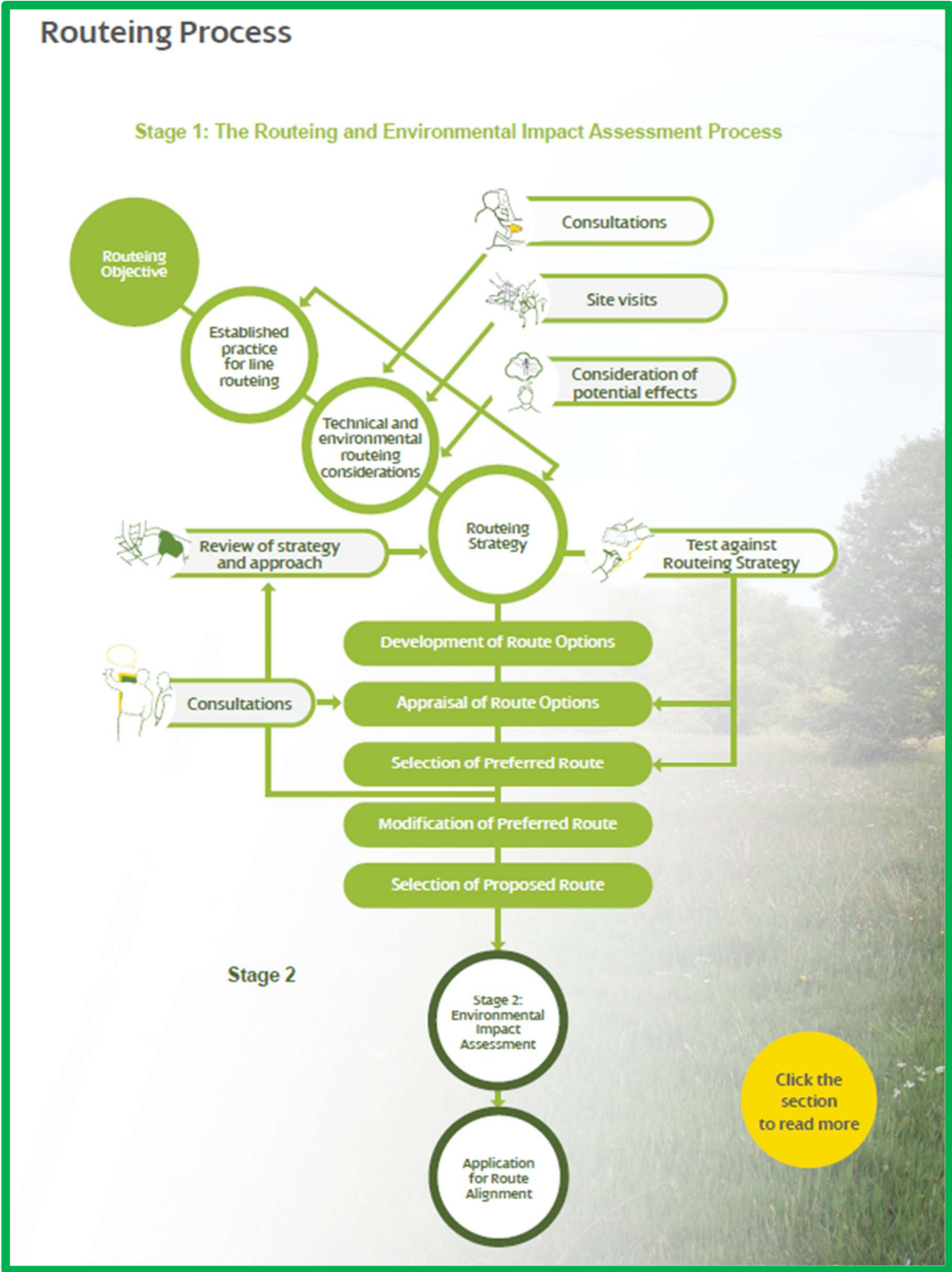
2 SPEN APPROACH TO ROUTEING

2.1 Overview of Routeing Process

SPEN's approach to routeing an overhead line is based on the premise that the major effect of an overhead line is visual and that the degree of visual intrusion can be reduced by careful routeing. A reduction in visual intrusion can be achieved by routeing the line to fit the topography, by using topography and trees to provide screening and/or background, and by routeing the line at a distance from settlements and roads. In addition, a well-routed line takes into account other environmental and technical considerations and would avoid, wherever possible, the most sensitive and valued natural and man-made features.

Figure 2.1 illustrates the process flow which SPEN adopts for OHL routeing and which has been applied to this project. The following sections describe the key stages in this process.

Figure 2.1: SPEN Approach to Routeing



2.2 Routeing Strategy Methodology

2.2.1 Overview

The route development and assessment methodology adhered to within this report is consistent with SPEN's approach to routeing². SPEN's guidance broadly recommends that projects should adhere to the following process:

- Routeing Objective;
- Established practice for OHL routeing;
- Consideration of potential effects, technical & environmental routeing considerations;
- Develop project specific Routeing Strategy;
- Development of route options;
- Appraisal of route options and selection of preferred route;
- Consultation on the preferred route
- Modification of the preferred route;
- Selection of the proposed route and environmental impact assessment

The proposed route selection is then taken forward to an EIA process and is used as a basis for an application for consent.

The way in which the routeing assessment has been undertaken is described in the sections below.

2.2.2 Routeing Objective

The objective of the route selection process is to identify a technically feasible and economically viable OHL route between the Kennoxhead Windfarm and Coalburn Substation, which causes least disturbance to people and the environment.

2.2.3 Established Practice for Overhead Line Routeing

The Holford Rules Guidelines for Routeing of new high voltage overhead transmission lines

It is generally accepted across the electricity industry that the guidelines developed by the late Lord Holford in 1959 for routeing overhead lines, 'The Holford Rules', should continue to be employed as the basis for routeing high voltage overhead lines. The Holford Rules were reviewed circa 1992 by the National Grid Company (NGC) Plc (now National Grid Transmission (NGT)) as owner and operator of the electricity transmission network in England and Wales, with notes of clarification added to update the Holford Rules. A subsequent review of the Holford Rules (and NGC clarification notes) was undertaken by Scottish Hydro Electric Transmission Limited (SHETL) in 2003 to reflect Scottish circumstances. A summary of the Holford Rules are summarised in Box 2.1.

² SP Energy Networks. 2015. *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*. Available at: https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_FINAL_20150527.pdf <Accessed 13/05/2019>

2.2.4 Design Techniques for Forest Management Planning (2014)

Guidelines have been produced by the Forestry Commission (now Scottish Forestry) for the design of woodlands. These include a section on the design of open spaces in the forest, which discusses how OHL wayleaves can be integrated in the forest design.

The SPEN guidance requires standard application of the Holford Rules, as well as Forestry Commission guidelines if and when the new OHL may pass through forestry. The Forestry Commission guidelines state that, where possible, OHL should follow open space and run alongside woodland, instead of through it.

SPEN's approach to routeing OHL is primarily based on the idea that any major effect of an overhead line will be visual, and that the degree of visual intrusion can be reduced by carefully routeing the development. Techniques to reduce visual intrusion of OHLs include using the topography and trees to provide screening and background, as well as ensuring that OHL is routed at a distance away from settlements and roads where possible. Particularly sensitive and valued natural and man-made features should also be avoided, with a well-routed OHL also taking into account any other technical and environmental considerations.

2.2.5 Routeing Considerations

Overhead lines are linear elements in the landscape. They are likely to affect, to varying degrees, visual and other environmental aspects of the area through which they run. This part of the process predominantly comprises information gathering and consideration of the potential for effects.

The initial stage is to determine a study area and gather baseline information within this area through desk-based studies, site visits, and consultations in order to identify potential constraints and opportunities to routeing.

To define a route that meets the requirements of the Electricity Act, a balance must be struck between three sets of considerations:

- Economic
- Technical
- Environmental

2.2.6 Economic Considerations

In compliance with Schedule 9 of the Electricity Act the routeing objective requires the proposed connection to be economical. It is understood that this is interpreted by SPEN as meaning that as far as possible, and all other things being equal, the connections should be as direct as possible and the route should avoid areas where technical difficulty or compensatory schemes would render the connection uneconomical.

2.2.7 Technical Considerations

Technical considerations potentially include existing infrastructure (in this case windfarms and overhead lines), altitude and slope angle, and physical constraints such as large water bodies.

These technical considerations are not considered as being absolute constraints but are a guide to routeing. The approach taken is to identify preferred environmental options informed by a staged review of technical issues.

2.2.8 Environmental Considerations

Statutory duties imposed by Schedule 9 of the Electricity Act require licence holders to seek to preserve features of natural and cultural heritage interest and mitigate where possible, any adverse effects which a development may have. Experience across the electricity industry shows that an overhead transmission line is likely to affect to varying degrees the following:

- Landscape and visual amenity
- Ecology, ornithology and nature conservation
- Geology, hydrogeology and hydrology
- Cultural heritage
- Forestry and woodland

Other considerations which may affect routeing to a greater or lesser degree include:

- Planning allocations and major applications
- Noise
- Traffic (access for construction)
- Land Use (agriculture)
- Socio-Economics (tourism and recreation)

Box 2.1: – Holford Rules

<p>Rule 1</p>	<ul style="list-style-type: none"> • Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if the total mileage is somewhat increased in consequence.
<p>Rule 2</p>	<ul style="list-style-type: none"> • Avoid smaller areas of high amenity value, or scientific interest by deviation; provided that this can be done without using too many angle towers, i.e. the more massive structures which are used when lines change direction.
<p>Rule 3</p>	<ul style="list-style-type: none"> • Other things being equal, choose the most direct line, with no sharp changes of direction and thus with few angle towers.
<p>Rule 4</p>	<ul style="list-style-type: none"> • Choose tree and hill backgrounds in preference to sky backgrounds, wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.
<p>Rule 5</p>	<ul style="list-style-type: none"> • Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.
<p>Rule 6</p>	<ul style="list-style-type: none"> • In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.
<p>Rule 7</p>	<ul style="list-style-type: none"> • Approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of undergrounding, for lines other than those of the highest voltage.

2.3 Consideration of potential effects, technical & environmental routeing options

2.3.1 Study Area and Buffer Zone

A study area with a 2 km buffer zone (Figure 2.1) has been defined for this routeing process – large enough to accommodate all likely route options. The purpose of defining the study area and buffer zone is as follows:

- The study area comprises the area within which various options for locating the proposed development are identified and assessed; and
- The buffer zone comprises a larger area within which potential impacts of the proposed development on the environment may occur. Potential impacts are identified and evaluated, in order to define the overall preferred route option.

2.3.2 Collection of Background Information

Following the establishment of the Study Area, an initial evaluation of environmental and technical constraints was undertaken. Key constraints were initially mapped for the study area and buffer zone using Geographical Information Systems (GIS), and collated from sources in the public domain and via external consultation with stakeholders where required. This data was supplemented where required by field survey. Constraints and potential issues considered when collecting background information have been outlined within Table 2.1.

Table 2.1 – Key constraints

	Constraints/Issues
Environmental	Ecology
	Ornithology
	Landscape (designations and character)
	Visual Amenity
	Archaeology and cultural heritage
	Recreation and tourism
	Hydrology, hydrogeology and geology (including peat)
	Residential dwellings and land use
	Other land uses (e.g., forestry, transmission lines, mineral operations, windfarms, agricultural, and roads)
Technical	Slope/gradient (topography)
	Existing infrastructure (or in the planning process)
	Altitude

	Constraints/Issues
	Ground Conditions
	Presence of large waterbodies
Economic	Ensure viability – as far as reasonably possible, the line should be direct and avoid areas where technical difficulty or compensatory requirements would render the scheme unviable on economic grounds.

3 ROUTE CONSULTATION

3.1 Public exhibitions

SPEN hosted events in Coalburn and Douglas during February 2020 to present and consult on the Preferred Route option for the new 132 kilovolt (kV) overhead line (OHL). Before these events SPEN reviewed all the feedback from the community during the previous consultation on the Dalquhandy to Coalburn Substation OHL project as well as statutory consultees and potentially affected landowners to determine a Preferred Route.

Prior to preparing a section 37 consent application to the Scottish Government, SPEN held consultation events where members of the public were able to view and comment on the Preferred Route.

The public consultation events were advertised in a variety of different methods. The events were advertised in the Carlisle and Lanark Gazette published in January 2020. An email notification was sent to local councillors and community councils and consultees. A poster was created and distributed locally in Coalburn and Douglas. A copy of the Routeing Consultation Report was made available for public viewing during normal hours at South Lanarkshire Council's offices in Hamilton, Coalburn Miners Welfare One Stop Shop and Douglas St Brides Hall.

Exhibitions were held in the following locations:

Wednesday, 5th February 2020

1.00 – 8.00pm

Coalburn Miners Welfare One Stop Shop

42 Coalburn Road · Coalburn · South Lanarkshire · ML11 0LH

Thursday, 6th February 2020

1.00 – 8.00pm

Douglas St Brides Hall

Braehead · Douglas · Lanark · ML11 0QW

A series of public information events were held online to update on the progress of the proposals:

20 June 2022: 3-4 pm

21 June 2022: 6.30-7.30 pm

22 June 2022: 3-4 pm

Visit: www.spenknoxhead.co.uk/publicsession.

These events were advertised in the Carlisle and Lanark Gazette on the 8th and 15th June 2022 and local Community Councils and elected members were notified.

The number of attendees present at each exhibition is illustrated in Chart 1 below:

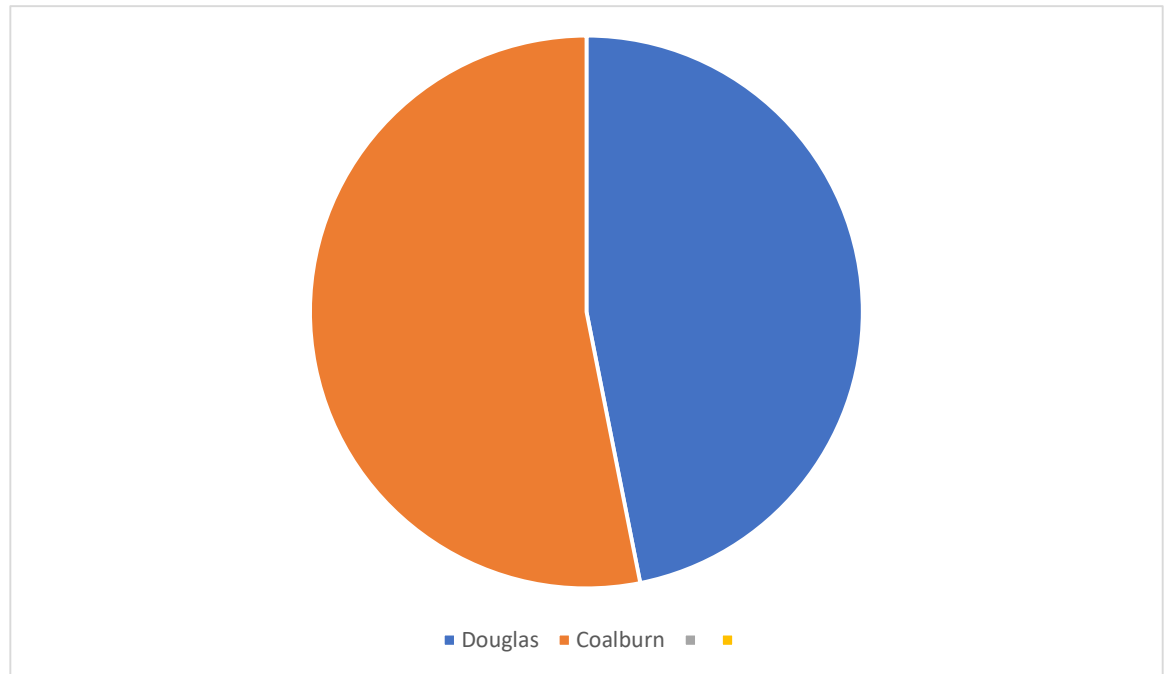


Chart 1: No of attendees recorded at the Public Exhibitions for the Preferred Route.

3.2 Public Exhibitions – Public Comments

All attendees to the exhibitions were encouraged to complete a feedback form.

- 32 registered attendees at events
- 5 feedback forms received
- 16% of those who attended an exhibition submitted a feedback form.

Question 1 on feedback form:

‘If you would like us to keep in touch regarding this project, please provide your contact details below. If you would rather remain anonymous, please move to the next question.’

Everyone that submitted a feedback form provided contact details.

Question 2 on feedback form:

‘Do you have any comments regarding the rationale for the project?’

A summary of the main comments received is provided below:

Four respondents raised concerns regarding the proposed OHL questioning why the OHL couldn't be undergrounded.

One respondent stated that they understood why we need to pursue more efficient and cleaner ways of providing electricity.

Question 3 on feedback form:

‘Do you have any other comments regarding our proposed preferred route?’

A summary of the main comments received is provided below:

One respondent did not have any comments.

Four respondents stated that the OHL should be undergrounded for landscape and visual reasons.

Question 4 on feedback form:

‘How did you hear about the exhibition?’

Responses were as follows:

Community Council

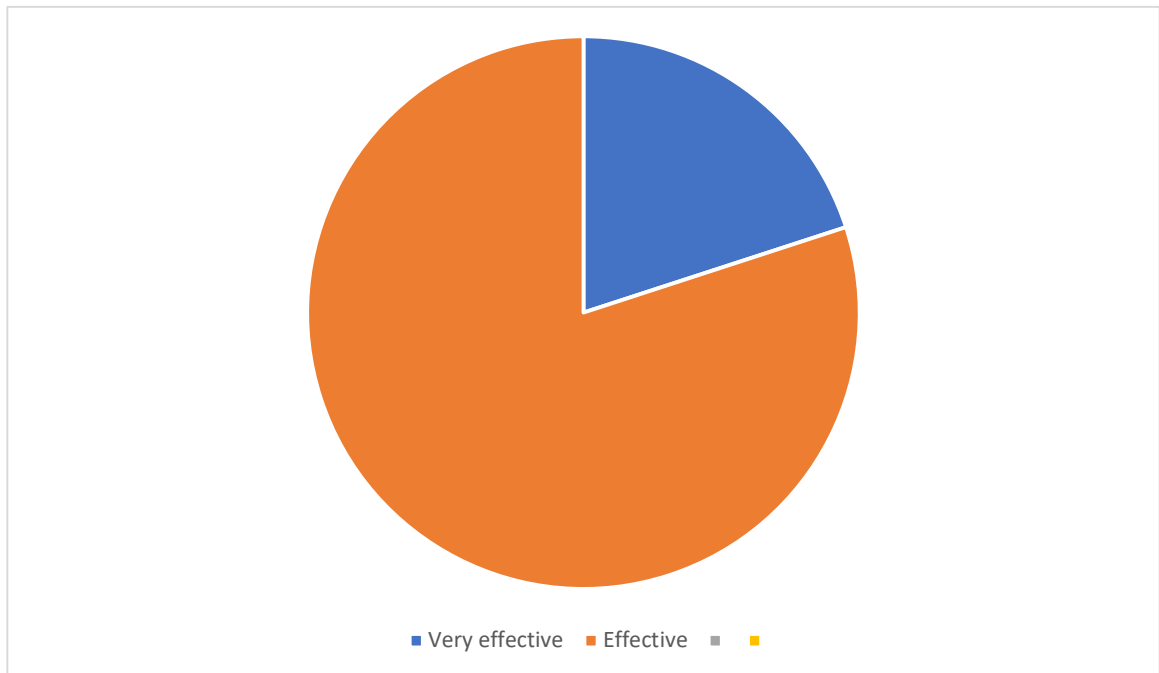
Email

Douglas Community Council

Local Councillor

Question 5 on feedback form:

‘How effective was the exhibition in helping you gain an understanding of the selection of the preferred route?’



Question 6 on feedback form:

‘Is there any other information that you would find helpful?’

Only comments received related to suggestions that a representative from Wind Farm developer should have attended the exhibition and that the developer must be clearer about their proposals/message.

Other

An email was received from a Coalburn resident who couldn’t attend the exhibition. This resident felt that the OHL would spoil the area and that with weather conditions experienced in the area there would be a danger that the lines would be brought down in high winds.

An email was received from a Douglas resident who couldn’t attend the exhibition. This stated the following: *‘I would just like to say how informative we found tonight [6/2/2020] exhibition. I found the people helpful and knowledgeable .Able to handle all my concerns’.*

A letter was received from another resident acting on behalf of Coalburn Community Council which stated that ‘We have no wish to stand in the way of progress, but we don’t see the area being blighted with poles and overhead cables being classed as progress. wonder if you could provide us with a letter to read out at the meeting and also put on our website, detailing your response and explaining to us and them why we are yet again at an impasse in under two years with the same people.’

Direct correspondence was received from Coalburn Community Council in July and October 2021 which raised concerns over the OHL not being undergrounded, proximity to houses, health, traffic, health and safety, ecology, landscape and visual impact and economic impacts. Similar concerns were raised by a local MSP acting on behalf of concerned residents.

Acknowledgement of all responses

Since the initial consultation events, there has been further correspondence with individuals and groups concerning the proposed development. Every response received over the lifetime of the project was reviewed and responded to by SPEN. A summary of the main issues raised and the response provided by SPEN is presented in **Appendix 1**.

3.3 Routing Consultation Document

For the proposed development, SPEN began by establishing a number of possible ‘route options’. This process involved designing routes in accordance with the Holford Rules, that best fit the landscape and minimise effects on visual amenity, whilst avoiding wherever possible areas of high environmental value. To allow identification of a preferred route option, an appraisal of the route options was undertaken against technical, economic and environmental considerations to identify the relative potential of each route option to accommodate an OHL.

Having identified the preferred route option, a Routeing Consultation Strategy Document (RCD) was published in December 2019. This document described the route selection process for the proposed grid connection. It was made available for public viewing in January 2020 during normal hours at South Lanarkshire Council’s offices in Hamilton, Coalburn Miners Welfare One Stop Shop and Douglas St Brides Hall, giving interested stakeholders the information required to engage and comment on the project at an early stage.

In advance of the public exhibitions in February 2020 key statutory and non-statutory consultees were contacted to inform them about the proposals and give them the opportunity to comment on the preferred route and the routeing consultation document. **Table 3.1** provides a list of these consultees

Table 3.1 Consultee List

Statutory Consultees	Non-Statutory Consultees			
Scottish Government ECU	Scottish Rights of Way and Access Society (ScotWays)	The Crown Estate	Health and Safety Executive	National Trust for Scotland
South Lanarkshire Council	Civil Aviation Authority	National Air Traffic Services Safeguarding	BT	Sustrans Scotland
SNH	Visit Scotland	BAA (Glasgow Airport)	Glasgow Prestwick Airport	Fisheries Management Scotland
Historic Environment Scotland	Clyde River Foundation	Scottish Wildlife Trust	The Coal Authority	British Horse Society

Statutory Consultees	Non-Statutory Consultees			
SEPA	Defence Infrastructure Organisation (MoD)	Association for the Protection of Rural Scotland (APRS)	RSPB	West of Scotland Archaeology Service (WoSAS)
	Scottish Forestry	Marine Scotland	Transport Scotland	Scottish Water
	British Trust for Ornithology Scotland (BTO)	JNCC (for Geological Conservation Review)	John Muir Trust	Mountaineering Scotland
	National Farmers Union	The Woodland Trust	Ramblers Association (Scotland)	Scottish Badgers
	Scotia Gas Networks			

A consultation meeting was offered to those who would be statutory consultees in the subsequent EIA process, to introduce the project and inform any responses at this stage. The meeting was attended by South Lanarkshire Council, SEPA and SNH.

Consultation Responses

Of the 38 consultees contacted, responses were obtained from 11. Additionally one response was received from a member of the public. Responses received from interested parties are summarised in **Table 3.2** along with a reply on each point.

Table 3.2: Summary of consultee comments

Consultee and Date	Comments	Response/Action taken
Crown Estate	Requested shapefiles for preferred route alignment. No further comment received.	Shapefiles provided.
Coalburn Community Council	Coalburn Community Council stated that they have no wish to stand in the way of progress, but they don't want to see the area being blighted with poles and overhead cables	

Consultee and Date	Comments	Response/Action taken
	being classed as progress. They would like the OHL undergrounded.	
Douglas Community Council	Douglas Community Council requested a figure showing the indicative route of the OHL and the proposed configuration so that it could be shown to members of the community council. No further comment received.	Figure provided.
Historic Environment Scotland	HES stated that as the three Route options presented are located in corridors away from sites for their historic environment interests they would therefore have no preference on these options.	Noted
JNCC	JNCC stated that as this development proposal is not located within the offshore area, does not have any potential offshore nature conservation issues and is not concerned with nature conservation at a UK-level, they do not have any comments to make on the consultation.	Noted
MOD Safeguarding	MOD confirmed that they had no safeguarding objections to the proposal. However whilst they have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. Defence Infrastructure Organisation (DIO) Safeguarding therefore requested that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing: a. Precise location of development. b. Date of commencement of construction. c. Date of completion of construction.	Noted.

Consultee and Date	Comments	Response/Action taken
	<p>d. The height above ground level of the tallest structure.</p> <p>e. The maximum extension height of any construction equipment.</p> <p>f. Details of aviation warning lighting fitted to the structure(s)</p>	
RSPB	<p>RSPB stated that until they have access to the full ornithological survey results and relevant environmental impact assessment (EIA) documents, they reserve judgement on the proposed route of the development. However, there are a few sections that they can provide comment on.</p> <p>They welcome the proposal to route the powerline around Coalburn Moss SSSI and SAC (section C1b on map 2). Ideally, they would like to see the line pass as far away as possible from the site in order to minimise the impacts on the birds that will be using the area.</p> <p>As the habitat management area (HMA) designated as part of the Kennoxhead Wind Farm development is impacted by this proposal, their preferred option for the most southerly section is marked A1 on map 2 of the leaflet and is the preferred route as per map 3 on the leaflet. This route will be furthest from the known black grouse leks and will have the least impact on the HMA from their current understanding, but as mentioned before they reserve full judgement until we have consulted the full EIA.</p>	Noted.
Scottish Forestry	Scottish Forestry stated that the main issue of concern to in relation to Development Planning is that of development deforestation and the potential effects it could have on	Noted.

Consultee and Date	Comments	Response/Action taken
	<p>the ecology and landscape of local and wider environs. Scottish Planning Policy paragraph 218, issued by the Scottish Government, refers to the Control of Woodland Removal Policy which seeks to protect the existing forest resource in Scotland, and supports woodland removal only where it would achieve significant and clearly defined additional public benefits.</p> <p>Scottish Forestry also stated that they have very much welcomed the ongoing discussions with SPEN and RSK on the Kennoxhead to Coalburn routing study and potential route options, since June 2019. We were pleased to note that the final route proposed is the same as that discussed at our most recent meeting and avoids as much woodland loss as possible. With this in mind Scottish Forestry have no further comments to add at this time.</p>	
SEPA	<p>At this stage given the design of the poles proposed SEPA didn't raise any route specific comments. Our standard comments would apply at this stage and the construction of the poles and OHL will probably be of most interest to us for the project going forward.</p>	Noted.
SNH	<p>SNH highlighted a couple of things in the Ecology Baseline Review (March 2019) and Ornithology Baseline Review (April 2019) that RSK sent them in late January that they wanted to pick up on in terms of the subsequent assessment of the proposed route:</p> <p>Firstly, the Ecology Baseline Review (March 2019) says that "If there will be no direct effect on the moss [Coalburn Moss SAC], SNH have</p>	<p>Issues raised by SNH taken into consideration and have been discussed with ornithologist and SNH to ensure compliance.</p> <p>Further discussions have been undertaken with SNH regarding Covid-19 situation and to agree approach if any surveys have to be postponed.</p>

Consultee and Date	Comments	Response/Action taken
	<p>previously said that an HRA would not be required". I'd just clarify that an HRA may also be needed if there are any indirect effects on the SAC. It may well be that any such effects will be avoided through the choice of exact location for the proposed route.</p> <p>Secondly, given that the route i) lies partly between two sections of the Muirkirk & North Lowther Uplands SPA, ii) it lies within the core foraging ranges of the SPAs breeding bird interests, and iii) there is some evidence from the flight activity surveys for the Kennoxhead Wind Farm ES of activity by SPA qualifying species in the area of the OHL, I'd be minded to suggest that there would be a 'likely significant effect' (in HRA terms) from the proposal on the SPA at this stage - i.e. that there is a connection between the proposal and the site's qualifying interests. While this is something we'd be happy to revisit once the results of your more recent survey work is available (the Kennoxhead data now being 8/9 years old and possibly not a reflection of current activity), it may mean that there will be a need to undertake an HRA in respect of the SPA too and thus, that the EIA Report will need to have sufficient information to allow this to be undertaken.</p>	
The Coal Authority	I can confirm however, that based on Map 3: Preferred route, parts of the site fall within the Coal Authority's defined Development High Risk Area. Accordingly, the planning authority will consult the Coal Authority on the planning application (in our role as statutory consultee). That is when the Planning team will become involved	Noted

Consultee and Date	Comments	Response/Action taken
	as we will need to assess the proposed development and the Coal Mining Risk Assessment that will also be required to be submitted with it.	

3.4 Scoping

Scoping provided stakeholders with a final opportunity to comment on the proposed route and to agree an appropriate EIA scope.

A Scoping Request was submitted alongside a Scoping Report to the ECU on 24 June 2020³, who then contacted the same consultees as before (Error! Reference source not found.) to determine their views on the proposed route of the Proposed development and to collect baseline information. Replies received from consultees in response to Scoping are detailed in **Appendix 1**.

As shown in **Appendix 1**, the scoping responses received in March 2021 indicated that, generally, the scope of the EIA had been defined appropriately. However, a number of consultees did highlight issues where further investigation or clarification was required. This has been highlighted and addressed where appropriate within the EIA Report. **Appendix 1** includes commentary from SPEN in responses to the issues raised. SPEN have undertaken an iterative design process based on the proposed route option identified at Scoping. In line with ECU guidance, it is recommended that advice regarding the requirement for additional scoping opinion is discussed with relevant consultees if no application has been submitted within 12 months of the date a scoping opinion has been received.

Although SPEN have taken on board all consultee comments and factored these into assessments a further scoping exercise was undertaken in May 2022 which involved asking consultees to highlight if they felt that there had been any significant changes to the scoping advice on environmental matters within their remit previously provided, Comments received are included in **Appendix 2**.

³ Accessible at: <https://www.energyconsents.scot/ApplicationSearch.aspx> using case reference ECU00002096

PROPOSED ROUTE AND NEXT STEPS

3.5 Summary of Proposed Route

SPEN undertook a routeing process, which involved development and appraisal of route options including consultation with key stakeholders and local communities (detailed further in Section 3), to select a proposed route. Following the identification of a 'proposed route', work was progressed to identify the most appropriate alignment for the proposed development. This design process was led by the SPEN OHL design team, informed by the emerging findings of the environmental surveys and input from technical specialists.

Where possible, SPEN wayleaves team also contacted landowners to discuss the initial design and gather their feedback. Where pole positions were considered to have a potentially adverse effect on the environment, or an adverse effect on land holdings, a new position was suggested by the SPEN wayleaves team and passed to the environmental specialists for comment. This feedback was then provided to the SPEN OHL design team for further consideration and accommodation where possible, (without compromising the technical design requirements).

The Proposed Route is shown on **Figure 1** in **Appendix 3** of this document.

Throughout the consultation process the Applicant has demonstrated, through changes to the proposed route and the information presented in this report, a responsiveness to consultation and feedback received.

Additionally, the consultation process itself has been designed to ensure that the maximum number of local stakeholders know about the project, can find out all required information promptly, provide comments and receive an adequate response.

3.6 Next Steps

SPEN will continue to respond to all questions and queries that are received in regards to the Scheme in timely manner and look to continue to build on the constructive dialogue with all stakeholders.

Responses to this document, and from ECU, will be used to finalise the terms of the EIA and the specific approach to the individual assessments.



APPENDIX 1 – CONSULTEE RESPONSES

Issue	Response
Why cant you put the cables underground ?	<p data-bbox="801 416 2004 443">SPEN have responsibility for providing the wind farm with a connection to the transmission network.</p> <p data-bbox="801 488 2063 624">The company, as transmission license holder, has an obligation to “develop and maintain an efficient, co-ordinated and economical system of electricity transmission”. SPEN is further obliged to “facilitate competition in the supply and generation of electricity” which is achieved by offering a connection to any developer as requested.</p> <p data-bbox="801 668 2063 730">Where a developer specifically requests an underground connection and agrees to meet associated costs, SPEN will investigate that option.</p> <p data-bbox="801 775 2051 948">SPEN assesses the requirements of the development and considers the range of economic, technical and environmental factors, specifically statutory duties and license obligations relating to the request. As a result of this and wherever practical, SPEN considers that a continuous overhead line connection is the appropriate proposal in the majority of cases. Considering the factors relevant to this request, an overhead line solution is considered appropriate and the developer wishes to progress that option.</p>



Issue	Response
<p>How close to the nearest house would these poles with overhead cables be ?</p>	<p>In the routeing process, a standoff of 100m has been applied as a ‘trigger for further consideration’ should we need to route closer than that to properties and the village.</p> <p>We have not required to do so and the line will be at least 100m from properties.</p> <p>While the final alignment is being developed at present, we anticipate alignment to be significantly in excess of this, nearer 200m from the main village and around 130m – 170m at very limited pinch points.</p>
<p>Why cant the poles be erected further away from the village ?</p>	<p>The routeing exercise undertaken identified routes for an overhead line, taking into account the various constraints in the area including settlements, individual properties, environmental designations amongst others.</p> <p>A route option further east was ruled out due to the presence of various constraints and similarly, options further west were limited due to proposed wind farm infrastructure.</p>
<p>Is there no another route you can take that would stop these poles with overhead cables going to close to Coalburn?</p> <p>Was consideration given to alternative routes for the cables, such as to be ran underground? Or has existing infrastructure along the M74/A74 corridor, as mentioned below, been given consideration?</p>	<p>Our routeing exercise has applied a standoff from Coalburn village and individual properties. The proposed route maintains this standoff as a minimum.</p> <p>A number of other route options were considered as part of our routeing exercise, in line with the established approach to routeing. Each of these were determined as not preferred for technical and/or environmental considerations.</p> <p>The opportunity for a route towards the M74/A74 was considered, but the presence of several technical and environmental constraints ruled this out as a feasible option.</p>



Issue	Response
<p>There has been lots of discussions regarding potential health issues from EMFs. Can you provide some detail?</p>	<p>Wherever electricity is used there will also be electric and magnetic fields. This is inherent in the laws of physics - we can modify the fields to some extent, but if we are going to use electricity, then EMFs are inevitable.</p> <p>Like many other phenomena that we encounter in nature, EMFs can be harmful at high-enough levels. But the fields required, for example, to start interfering with the body's nervous system are much greater than those produced by the UK electrical network.</p> <p>EMF measurements recorded during surveys of our electrical network are well within the UK Government's guidelines. These guidelines are set on advice from the Health Protection Agency. The UK has adopted the guidelines published by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and this policy was reaffirmed by a Written Ministerial Statement in October 2009. The ICNIRP 'reference level' for the public is: 100 microteslas (μT) for magnetic fields. These guidelines also form the basis of a European Union Recommendation on public exposure and a Directive on occupational exposure.</p> <p>The Energy Networks Association have produced a factsheet on this topic (EMF - The Facts)</p> <p>https://www.energynetworks.org/industry-hub/resource-library/electric-and-magnetic-fields-facts.pdf</p>
<p>What is the fire risk of wooden poles and stability of poles in this environment?</p>	<p>SPEN regularly patrol our overhead lines to check the integrity of structures, conductors and associated equipment, these inspections also take into consideration anything that has the potential to infringe on specified safety clearances. Vegetation management programmes are in place to prevent trees coming into contact with electrical conductors which eliminates the potential for conductors being brought to ground level.</p>



Issue	Response
<p>Will this development lead to issues locally, such as access problems for villagers, noise, dust, pollution, daylight, vibration during construction, shadow flicker, outlook and visual amenity, impact on conservation areas?</p> <p>What will the traffic impact be during site construction, what type and amount of additional traffic will there be?</p>	<p>The Environmental Impact Assessment that will accompany an application for Section 37 Consent considers the range of environmental topics considered relevant to the project and established in consultation with the Energy Consents Unit and Statutory Consultees at the Scoping stage. Coalburn Community Council were also included as a consultee in this process. Topics include: Ecology and Ornithology; Archaeology and Cultural Heritage; Landscape and Visual Amenity; Geology, Hydrogeology and Hydrology, Mining, Forestry. Traffic management considerations will be covered in relevant chapters and form part of the EIA.</p> <p>Any disturbance during construction is considered to be temporary for the period of construction. Working hours will be proposed within the EIA Report, however continuous working is not anticipated.</p> <p>In general, we would anticipate activities during construction to include 4x4 traffic for general site access, crew vans for transporting personnel, HGV for transporting plant and materials to site and fuel deliveries for plant.</p>
<p>What will hours of work be?</p> <p>What is the planned duration of the site construction phase and of the operation of the overhead cables?</p>	<p>Typically working hours are anticipated to be from 7.30 – 17.00 or as daylight hours allow, Monday – Friday or longer where no human or environmental sensitivities limit this.</p> <p>It is anticipated construction works will be complete within a 12 month period and the operational lifespan of the overhead line can vary, in line with maintenance. The application for consent will be for permanent development.</p>
<p>Is there going to be any compensation for those households in close proximity to the poles/overhead cables?</p>	<p>SPEN do not propose compensation for nearby properties during construction.</p>
<p>Has a preliminary ecological appraisal been completed – if so has the outcome been/or will be published. If further surveys are required what will this include?</p>	<p>Extensive environmental surveys have been undertaken as part of the routeing and Environmental Impact Assessment process. These will form the basis for the EIA Report that will be submitted in support of the Section 37 Application.</p>
<p>Has a screening under the Habitats Directive been completed for the intended project?</p>	<p>The appropriate Habitats Regulations Assessment will be prepared and accompany the EIA Report and Section 37 Application.</p>



Issue	Response
<p>What is the process for application, What information is provided?</p>	<p>An application for Section 37 Consent will be made to the Scottish Government Energy Consents Unit. The application will follow from the established SPEN approach to routeing major infrastructure projects, where information gathered at routeing, consultation and the earlier Scoping stage all inform the application.</p> <p>When the application is submitted, the Energy Consents Unit will carry out their own consultation, where individuals or groups are welcome to make representations regarding the application to the Energy Consents Unit, based on the detail provided with the application.</p> <p>An Environmental Impact Assessment Report will be prepared to support the Section 37 Application.</p> <p>This report will include chapters on each of the environmental topics identified at scoping stage, through consultation with stakeholders, as the relevant issues to cover. The report will set out an assessment of the proposed development and the degree of significance of impact in each topic. Topics include, policy context, landscape & visual amenity, Ecology & ornithology, hydrology, hydrogeology & geology, archaeology & cultural heritage and forestry.</p>



Issue	Response
What consultation has been conducted with the community about the proposed development?	<p>A non-statutory public consultation was carried out in support of our routeing stage, prior to selection of the proposed route that was taken forward to further detail design and assessment. A public consultation period for Kennoxhead WF Grid Connection ran from 1st February to 15th March with drop in consultation events held in Coalburn Miners Welfare on 5th February and Douglas St Bride's Hall on Thursday 6th February. Members of the public were able to provide feedback at these events to the project team, via email or in writing.</p> <p>A range of feedback was received at this consultation stage from individuals, community groups and other interested parties, both in support of proposals and highlighting issues. The feedback from consultation events was summarised in a Report On Consultation, submitted alongside the Scoping Request to the Scottish Government Energy Consents Unit.</p> <p>Following consultation feedback from Coalburn Community Council, further information was provided by letter, setting out in more detail the role of SPEN and the reasons for our approach. Members of the SPEN project team have also attended two Community council meetings, including one public meeting, to address any questions raised.</p>
What impact has the Covid-19 pandemic had on this consultation?	The consultation period was completed prior to any Covid-19 measures being put in place.



Issue	Response
<p>What are the elements of the proposed development (roads, design, etc)?</p>	<p>We propose to construct a new 132 kilovolt (kV) overhead line (OHL) supported by wood poles to connect the Kennoxhead Windfarm to the existing Coalburn substation, approximately 2.5 km northeast of Coalburn. The height of the wood poles above ground would range between 10m to 22m and have a typical height of 13m. As the majority of the route is above 200m above ordnance datum (AOD), the OHL will be constructed using H poles (two wooden poles rather than one), with a typical span between the poles of around 100m.</p> <p>Temporary access tracks, pulling areas and laydown areas would be required to construct the overhead line, with intention to construct with tracked/low ground pressure vehicles where possible, however trackway panels and temporary stone roads may be needed in some circumstances. A temporary construction compound is also proposed, outwith the village.</p>
<p>Do you have plans for making new or upgrading paths and walkways for the villagers</p>	<p>There is no intention to develop new or upgraded paths as part of this project.</p>
<p>Will there be any new substations as part of this development and what size would they be?</p>	<p>No substations are proposed as part of the Kennoxhead connection.</p>
<p>If the erection of overhead cables are agreed are there any job opportunities for residents and what are the numbers and nature of any new permanent jobs created in the vicinity</p>	<p>The types of skills required in building transmission lines are very specialised, although we are keen that our contractors work with local agencies where possible. Given the nature of the development, no permanent jobs are anticipated to be created.</p>
<p>Can you provide Zone of Theoretical Visibility (ZTV) mapping to give the community an understanding of how visible the overhead cables will be - and who will see them?</p>	<p>These details will be provided as part of the EIA Report that will support the Section 37 application.</p>
<p>Can you provide visualisations of site and construction of poles with overhead cables from the nearest village/houses of Coalburn and Glespin</p>	<p>These details will be provided as part of the EIA Report that will support the Section 37 application. Initial visualisations were presented to the community at Community Council meeting in October 2021.</p>



Issue	Response
Will you look to replace the wooden pole structure by pylons at a later date?	The application being proposed just now is for a wood pole design. If we obtain consent, that is what we will be able to build. If there was any intention to build a steel tower (pylon) line at any point in the future, that would be subject of a separate application for consent.
Could any of the the infrastructure which is currently in place could be considered for the connection?	The proposed development is for a 132kV connection. While there is other infrastructure in the vicinity, it is generally at lower distribution voltages (33kV and below) or higher transmission voltages (275kV and above). It is not possible to combine these voltages on the same conductors and the supports in place have not been designed to carry conductors in this sort of arrangement.
Why can't the connection being proposed here be exported through the existing underground cable for phase 1 of the wind farm?	The phase 1 connection has been contracted as a separate project, where the developer specifically requested a cable connection and agreed to bear the additional costs to do so. There is not a sufficient capacity in the cables to export the generation from both phases of the wind farm and therefore a further connection is required. In the absence of a similar request to underground and in line with SP Energy Networks assessment and statutory duties, an overhead line is proposed for this connection being developed.
What if residents are concerned about property devaluation?	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. In some cases the residential visual amenity impact on a property can be mitigated through micro-siting of individual poles, and we would seek to do this where possible and reflect the outcome of this in the EIA Report





APPENDIX 2 – SCOPING RESPONSES

The Kennoxhead Wind Farm to Coalburn Substation 132 kV Overhead Line Scoping Report was submitted to the Scottish Ministers Energy Consents Unit (ECU) on the 24th June 2020. The ECU distributed the Scoping Report and requested scoping opinions from the stakeholders and consultees listed in Table 1.1, below.

Table 0.1: Kennoxhead wind farm to Coalburn substation 132 kV overhead line scoping responses

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
STATUTORY CONSULTEES					
Scottish Government Energy Consents Unit (ECU) – Scoping Opinion	[REDACTED]	[REDACTED]	March 2021	Stated that, where there is a demonstrable requirement for peat landslide hazard risk assessment, the assessment should be undertaken as part of the EIA process.	The routing stage of the proposed development sought to avoid areas of deep peat as far as practicable to minimise potential for peat slide. Consideration of peat landslide hazard risk assessment will be covered in Chapter 7: Hydrology and Geology
				Consider that the mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Requested that a consolidated schedule of mitigation measures is included in the EIA Report.	All embedded mitigation measures are set out in Chapter 4: Development Description. In addition, the relevant embedded and additional mitigation measures are also described in detail in the specialist topic chapters. Chapter 2: Approach to the EIA will be supported by a Schedule of Mitigation which forms Appendix 2.2 and sets out all embedded and



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
					additional mitigation measures on a topic-by-topic basis.
				This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted.
				It is acknowledged that the EIA process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note further engagement between relevant parties in relation to the refinement of the design of the proposed development may be required, and would request that they are kept informed of ongoing discussions in relation to this.	Noted.
				When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in the scoping opinion has been addressed.	Noted.
				Applicants are encouraged to engage with officials at the Scottish Government Energy Consents Unit at the pre-application stage and before proposals reach the design freeze.	Noted.
South Lanarkshire Council (SLC)	[REDACTED]	[REDACTED] james.wright@southlanarkshire.gov.uk	4/12/20	<p><u>General</u></p> <p>SLC agree with the topics listed in the Scoping Report. Request that a standalone chapter outlining all proposed mitigation and enhancement measures should be included.</p> <p><u>Archaeology and Cultural Heritage</u></p> <p>Although it is explained in the text that Figure 5.1 only shows non-designated assets within a 200m buffer of the proposed overhead line (OHL) route, this is not clear on the figure, which gives a false impression of the range and density of recorded material present. Any</p>	<p>Noted</p> <p>An archaeological walkover survey identified all known and unknown non-designated assets within 200m of the proposed route, including associated infrastructure outside of this route corridor. Indirect impacts on setting of non-designated assets was considered</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>EAIR figures should make it clear that only non-designated assets within a 200m buffer have been shown on the figure.</p> <p>Important that the proposed field survey is undertaken to identify features not included in desk-based review and assess how features might be affected by ground disturbance caused by construction activities.</p> <p>Assessment of direct impacts during construction should include locations of wooden poles, compound areas, lay down areas and temporary access tracks.</p> <p>Disagree with scoping out indirect effects on setting until possible effects on the setting of non-designated assets have been considered as well as designated assets.</p> <p><u>Geology, Hydrogeology and Hydrology</u></p> <p>A sustainable drainage system serving the application site is to be provided. A flood risk assessment and the sustainable drainage system should comply with the requirements set out in SLC's Developer Design Guidance (dated May 2020). Consideration should also be given to surface water management during construction.</p>	<p>in assessment of potential significant effects. Results of survey and assessment detailed in Chapter 10: Cultural Heritage. WOSAS were consulted further. This consultation is detailed further in Chapter 10: Cultural Heritage.</p> <p>Flood risk, drainage and water management are addressed in Chapter 7: Hydrology and Geology, including relevant construction mitigation measures. An appraisal of the potential construction noise impact at the nearest residential receptors was conducted by a competent acoustics expert. The results of this are detailed in Chapter 2: Approach to the EIA. Given the minimal operational noise from installations of the proposed development's type and the short-term transient nature of construction works the scope of this appraisal is considered proportionate.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p><u>Amenity and Health</u></p> <p>Should be reference in EIAR, such as appendix or separate noise statement, to show that construction and operational noise will not impact amenity.</p> <p><u>Transportation</u></p> <p>Council would prefer stand alone chapter or transport statement rather than the TMP being a technical appendix.</p> <p>Details of scaffold arrangements and stand-offs to the public roads will be required along with proposals for traffic management.</p> <p>A submission of proposals showing specific material delivery points, lay down spaces, turning areas, site compound(s)/storage, site car parking, crane platforms is required. There should also be some information on the anticipated traffic volumes and routes associated with woodland clearance, material deliveries and site staffing.</p> <p>A larger scale plan showing the specific route of the OHL showing standoffs to the Council's road infrastructure such as culverts, bridges, underpasses should be submitted.</p>	<p>A section covering transportation is set out in Chapter 2: Approach to the EIA, which includes key data. Based on the short term nature of the construction and decommissioning processes, the geographic spread of the construction works on the public road network and SPEN's commitment to appropriate traffic management it is considered that this approach is proportionate.</p> <p>SLC Roads department were consulted further and details of this consultation are set out as relevant in Chapter 2: Approach to the EIA.</p>

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				Proposals for maintaining access to the Council's Core Paths during the construction phase should be submitted.	
South Lanarkshire Council	As above.	As above.	06/05/22	I'm content that the Council's scoping opinion response to Scottish Ministers is still appropriate in respect of the project as well as the further engagement that has also been carried out with the Council by yourselves since it was issued.	<u>Noted.</u>
NatureScot	[REDACTED]	[REDACTED]	04/09/20	<p><u>General</u></p> <p>NatureScot guidance 'General pre-application and scoping advice for onshore wind farms' provides information on recommended survey methods, sources of further information and guidance, and data presentation.</p> <p>Following cases decided in the EU Court of Justice, mitigation cannot be taken into account in the assessment of effects on Natura sites unless the mitigation is essential/intrinsic.</p> <p><u>Key Issues</u></p> <p>Protected areas:</p> <ul style="list-style-type: none"> Muirkirk & North Lowther Uplands Special Protection Area (SPA) – preferred route lies close to SPA, which is classified for its breeding hen harrier, peregrine, merlin, short-eared owl and golden plover and for its non-breeding (wintering) hen harrier. A Habitats Regulations Appraisal (HRA) will likely be required so application must include sufficient information to facilitate this. There is likely to be a significant effect on the SPA because it overlaps with the foraging ranges of the SPA species. EIA should consider collision risk for SPA bird species during operation, potential disturbance for SPA species during breeding season and for hen harrier during nonbreeding season. Coalburn Moss Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) – designated for active 	Consideration of protected areas and peat is provided in Chapter 8: Ecology and Chapter 9: Ornithology .

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>raised bog and degraded raised bog still capable of natural regeneration. Will also be subject to a HRA if significant effects likely so application must include sufficient information to facilitate this. EIAR should include information of the proposed route and construction methods, including access requirements, so potential significant effects on SAC can be determined. EIA should consider stand alone and cumulative effects on SAC. If no significant effects predicted then there should be sufficient justification in EIAR. Coalburn Moss SSSI also notified for raised bog habitat so advice above should be followed in assessment of impacts on the SSSI.</p> <ul style="list-style-type: none"> • Kennox Water SSSI - notified for its geological interest. The potential for impacts on the geological interest of the site, including indirect impacts on the site's accessibility or visibility, will require consideration as part of the EIA process. Recommend that a buffer between the site and any development is maintained. Adjacent development would only be likely to affect the interest of the site if construction debris was to be deposited within the site. <p><u>Carbon-Rich Soils, Deep Peat and Priority Peatland Habitat</u></p> <p>Welcome proposal for targeted peat depth surveys. Part of preferred route, north of Coalburn, classes as Class 1 peat so will be a key area for surveying. Surveys should comply with Scottish Government guidance. SEPA should be consulted regarding excavated peat reuse and disposal. A draft peat management plan should be included in EIAR.</p> <p><u>Landscape and Visual Impacts</u></p> <p>Would like to agree final viewpoint list with applicant. Cumulative effects should be considered. Cumulative assessment should consider current baseline (existing and under construction developments) and alternative</p>	<p>Construction within peatland has been kept to a practical minimum. Methods for managing peat on site are outlined in Chapter 7: Hydrology and Geology. A peat management plan would be created prior to construction in any areas of peatland.</p> <p>The final viewpoint list was agreed in consultation with NatureScot.</p> <p>All existing cumulative sites have been considered in the existing baseline. An alternative baseline that includes under construction or consented schemes has been assessed. Details of the cumulative assessment are provided in Chapter 6 Landscape and Visual Amenity.</p> <p>A ZTV is included in Volume 3: Figures and Visualisations.</p> <p>Consideration of ecology and ornithology is provided in Chapter 8 and Chapter 9. Any further consultation is detailed further in these chapters. Full details of ecology and ornithology</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>baselines, such as consented but not constructed schemes. Cumulative assessment should accord with NatureScot guidance.</p> <p>Expect a final Zone of Theoretical Visibility (ZTV) to be included in the EIAR.</p> <p><u>Ecology and Ornithology</u></p> <p>Advise the applicant seeks information on breeding raptors from the South Strathclyde Raptor Study Group to help with EIAR and issues that may need addressed during construction.</p> <p>Recommend Phase 1 habitat survey focuses on habitats listed in Annex 1 of the EC Habitats directive and UKBAP Priority Habitats, and be accompanied by supporting quadrat information.</p> <p>Protected species surveys should be undertaken in accordance with NatureScot guidance.</p> <p>Regarding ornithological surveys:</p> <ul style="list-style-type: none"> all relevant wind farm data, even data older than 5 years if the recent data supports its conclusions, is appropriate; surveys missed due to Covid-19 are required but only one year necessary. Principle surveys required are the winter walkover surveys, which should be completed fully in 20/21 season and the Moorland Breeding Bird/Scarce Breeding Bird surveys in 2021. Guidance from NatureScot available; and Would like black grouse surveys to be taken and factored into design. Evidence from recent wind farm surveys indicate that black grouse population might be of national importance. Black grouse susceptible to collision with OHL so mitigation by good route planning advised. 	<p>survey efforts are included in Appendices 8.1-8.3.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
NatureScot	[REDACTED]	[REDACTED]	30/05/22	Agree that there's been no significant changes to our advice and therefore it remains appropriate.	Noted.
Scottish Environment Protection Agency (SEPA)	[REDACTED]	[REDACTED]	Letter response dated 7 th September 2020.	<p><u>General</u></p> <p>Following key issues must be addressed in the EIA to avoid delay and potential objection:</p> <ul style="list-style-type: none"> • Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications; • Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTEs) and buffers; • Map and assessment of impacts upon groundwater abstractions and buffers; • Peat depth survey and table detailing re-use proposals; • Map and table detailing forest removal; • Map and site layout of borrow pits; • Pollution Prevention Plan and Construction Method Statement; • Borrow Pit Site Management Plan; • Map of proposed surface water drainage layout; and • Map of any proposed water abstractions, with details of the proposed operating regime. <p><u>Site-Specific Comments`</u></p>	<p>Chapter 7: Hydrology and Geology assesses the effects of the proposed development on the water environment and is accompanied by supporting figures. CAR licences will be applied for by the appointed contractor during the construction stage.</p> <p>A schedule of mitigation is included in Appendix 2.2.</p> <p>Further design details relating to peat are included in Chapter 3: The Routeing Process and design Strategy and Chapter 7: Hydrology and Geology.</p> <p>Methods for managing peat on site are outlined in Chapter 7: Hydrology and</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>A peat management plan should be submitted with EIAR and include assessment of opportunities for enhancement.</p> <p>Would welcome an assessment of habitat enhancement along proposed route.</p> <p>Habitat maps must be overlain with all proposed infrastructure.</p> <p>Invasive non-native species survey not required but final plans should include a commitment that any INNS encountered will be appropriately managed.</p> <p><u>Regulatory Advice</u></p> <p>Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).</p> <p>Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.</p> <p>A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:</p> <ul style="list-style-type: none"> • is more than 4 hectares, • is in excess of 5km, or 	<p>Geology. A peat management plan would be created prior to construction in any areas of peatland. Noted.</p> <p>Noted.</p> <p>Noted.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<ul style="list-style-type: none"> includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25° <p>Below these thresholds the applicant will need to comply with CAR General Binding Rule 10 which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.</p> <p>SEPA have guidance for construction sites. Applicant can engage SEPA in pre-CAR application discussions.</p> <p><u>Site Layout</u></p> <p>All maps must be based on an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure.</p> <p>Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.</p> <p><u>Engineering Activities</u></p> <p>The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:</p> <ul style="list-style-type: none"> All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; 	<p>Noted.</p> <p>The routeing stage of the project sought to avoid or cross all flood zones at their narrowest point where avoidance was not possible. The detailed design stage has sought to avoid watercourse crossings by maintaining a 20m buffer around all ground infrastructure. Where this has not been possible due to other environmental constraints, details have been provided in Chapter 7.</p> <p>Further design details relating to the water environment are included in Chapter 3.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<ul style="list-style-type: none"> A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works; Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds <p>If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.</p> <p>Refer to Appendix 2 of SEPA's Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted. SEPA's 'technical flood risk guidance for stakeholders' outlines the information required as part of a Flood Risk Assessment.</p> <p><u>Disturbance and Re-Use of Excavated Peat and Other Carbon Rich Soils</u></p> <p>The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.</p> <p>The submission must include:</p> <ul style="list-style-type: none"> A detailed map of peat depths (this must be to full depth and follow the survey requirement of Scottish Government's 	



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>guidance) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors; and</p> <ul style="list-style-type: none"> A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included. <p>Proposals must be in accordance with Scottish Renewables 'Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste' and SEPA's 'Developments on Peat and Off-Site uses of Waste Peat'.</p> <p><u>Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)</u></p> <p>The layout and design of the development must avoid impact on GWDTE. The following information must be included in the submission:</p> <ul style="list-style-type: none"> A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected 	<p>Targeted NVC surveys have been undertaken across the route to inform an assessment of effects on GWDTEs in Chapter 7, and findings are presented in Appendix 8.1.</p> <p>Consideration of groundwater abstractions will be provided in Chapter 7.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p><u>Existing Groundwater Abstractions</u></p> <p>The submission must include:</p> <ul style="list-style-type: none"> a map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; and If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. <p><u>Forest Removal and Forest Waste</u></p> <p>Key holing must be used wherever possible. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.</p> <p>Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:</p> <ul style="list-style-type: none"> a map demarcating the areas to be subject to different felling techniques; photography of general timber condition in each of these areas; 	<p>Chapter 10 provides an assessment of effects of the Kennoxhead OHL project on forestry resources along the proposed route.</p> <p>Forestry proposals are shown in a Technical Appendix.</p> <p>Noted.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<ul style="list-style-type: none"> a table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site and a plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. <p><u>Borrow Pits</u></p> <p>Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.</p> <p>A Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:</p> <ul style="list-style-type: none"> a map showing the location, size, depths and dimensions. a map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure overlain with all lochs and watercourses to a distance of 250 metres. It should be demonstrated that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for 	



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>the proposed use, including any risk of pollution caused by degradation of the rock.</p> <ul style="list-style-type: none"> • a ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table. • a site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works. • a site map showing proposed water abstractions with details of the volumes and timings of abstractions. • a site map showing the location of pollution prevention measures. The drawing notes should include a commitment to check these daily. • a site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (following guidance outlined above). • sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. • details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding. <p><u>Pollution Prevention and Environmental Management</u></p>	<p>A schedule of mitigation is included in Appendix 2.2.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<p>A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.</p> <p>The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing.</p>	
Scottish Environment Protection Agency (SEPA)	[REDACTED]	[REDACTED]	23/05/22	I have reviewed our previous scoping response and the subsequent correspondence you have had with SEPA and we agree that our previous response remains appropriate.	Noted.
Historic Environment Scotland (HES)	[REDACTED]	[REDACTED]	20/08/20	<p>HES advised that WOSAS would be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by HES interests, such as unscheduled archaeology, and category B- and C-listed buildings.</p> <p>Confirm that there are no heritage assets within their statutory remit within the development site boundary or within its vicinity. Content for heritage assets within HES statutory remit to be scoped out of the assessment.</p>	<p>Noted.</p> <p>WOSAS were consulted further. This consultation is detailed further in Chapter 10: Cultural Heritage.</p>
Historic Environment Scotland (HES)	[REDACTED]	[REDACTED]	16/05/22	We were consulted on similar proposals back in August 2020. Our response remains the same which is that there are no heritage assets within our statutory remit within the development site boundary or within its vicinity. On this basis we would be content for heritage assets within our statutory remit to be scoped out of the assessment.	Noted
Non-statutory Consultees					

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
British Horse Society (BHS)	[REDACTED]	[REDACTED]	17/09/20	BHS would like to see the multi-use nature of core paths and rights of way (as in utilised by walkers, cyclists, horse riders and all abilities access takers, in keeping with the Land Reform (Scotland) 2003 Act) taken into consideration.	All new access track formations will be temporary and for facilitating construction of the New 132kV OHL only -see Chapter 4: Development Description . Whilst temporary diversions of recreational routes may be required during construction, works at any one location will be short in duration therefore the effect of a diversion would be limited. All existing recreational paths will remain open during operation of the OHL.
BT	[REDACTED]	[REDACTED]	19/08/20	The proposed OHL should not cause interference to BT's current and presently planned radio network.	Noted.
BT	[REDACTED]	[REDACTED]	17/05/22	There's no change BT's scoping opinion, we have no objection to the proposed OHL	Noted.
The Coal Authority	[REDACTED]	[REDACTED]	26/08/20	<p>The identified proposed route falls within the Development High Risk Area (DHRA). Accordingly, there are coal mining features and hazards that need to be considered in relation to this project.</p> <p>A Coal Mining Risk Assessment, or equivalent to inform the EIAR Chapter on Ground Conditions should be submitted in support of the proposed route. This will enable the applicant's technical consultants to identify and mitigate any risk to the scheme as a result of former coal mining activity and for the applicant to demonstrate to the decision maker that the site is safe, stable and suitable for the development proposed.</p>	Chapter 7: Hydrology and Geology has assessed potential coal mining risk during construction and operation.



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
Crown Estate Scotland	[REDACTED]	[REDACTED]	28/08/20	The assets of Crown Estate Scotland are not affected by this proposal.	Noted.
Defence Infrastructure Organisation (MoD)	[REDACTED]	[REDACTED]	26/08/20	The Ministry of Defence has raised no safeguarding objections on the basis that the proposed Kennoxhead OHL Project is outside of the MoD safeguarding areas.	Noted.
Defence Infrastructure Organisation (MoD)	[REDACTED]	[REDACTED]	01/06/22	Understood that this enquiry relates to a directive that in the event of a none application within 12 months of a scoping opinion, further engagement with relevant consultees is required to ascertain if additional scoping opinion is required. I have had a cursory search of the Energy Consents planning website, and additionally note no further updates since the DIO consultation response dated 26/08/20, which indicated our scoping opinion, which remains extant	Noted.
Glasgow Airport	[REDACTED]	[REDACTED]	28/08/20	The site is located outwith the Obstacle Limitation Surfaces for Glasgow Airport. It is within the Instrument Flight Procedure safeguarding area and may impact upon procedures. Glasgow Airport's position will only be confirmed once the OHL details are finalised and they have been consulted on a full planning application.	Noted



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
Glasgow Prestwick Airport			06/09/20	This application will have no aviation safeguarding impact on Glasgow Prestwick Airport. Consequently it is unlikely that Glasgow Prestwick Airport Ltd will object.	Noted.
NATS Safeguarding			17/08/20	NATS examined the proposed OHL from a technical safeguarding aspect and confirmed that it does not conflict with their safeguarding criteria. Accordingly, NATS raised no safeguarding objection to the proposal.	Noted.
RSPB			14/09/20	RSPB confirmed that they had no comments to make.	Noted.
Scottish Forestry			20/08/20	Having reviewed the proposed route and the scoping report, Scottish Forestry confirmed that they are pleased to note that the route remains as previously discussed in June 2019. However we also note that the route has not been finalised and could still be subject to change. It is also noted within paragraph 9.4.1 Compensatory Planting, that the compensatory planting requirements of the proposed route is currently 8.12ha and if subject to change due to routing alongside Carmacoup Forest, that this figure might reduce to 6ha. Whilst we appreciate that this figure has been calculated, Scottish Forestry would wish to see a firm commitment within the EIA to provide a Compensatory Planting	Compensatory planting requirements are discussed in Chapter 10: Forestry



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				Plan, subject to approval by SF, that details the location, final area, ground preparation, species choice, protection measures and long term management of the planting, should planning approval be granted and before any development work begins.	
Scottish Forestry	[REDACTED]	[REDACTED]	11/05/22	Scottish Forestry has not had sight of any changes to the route since the scoping opinion was provided by ECU. Assuming there have been no significant alterations since then we have nothing further to add to our previous responses.	Noted.
ScotWays	[REDACTED]	[REDACTED]	23/09/20	<p>The National Catalogue of Rights of Way shows that rights of way SL103, SL117, SL118 and SL122 would be affected by 'proposed route'. As there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded.</p> <p>There may be general access rights over any area of land under the terms of the Land Reform (Scotland) Act 2003. Recommend that the applicant consult the Core Paths Plans, prepared by South Lanarkshire Council.</p>	Consideration of rights of way will be given in Chapter 2; Approach to the EIA
Scottish Water	[REDACTED]	[REDACTED]	17/09/20	<p>Scottish Water has no objection to this planning application; however, this does not confirm that the proposed development can currently be serviced the following is advised:</p> <ul style="list-style-type: none"> the development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact the Asset Impact Team to apply for a diversion. any conflict with assets identified may be subject to restrictions on proximity of construction. Scottish Water asset plans can be obtained Site Investigation Services (UK) Ltd; there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas that may be affected by the proposed activity; 	Noted

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<ul style="list-style-type: none"> • Scottish Water will not accept any surface water connections into their combined sewer system. There may be limited exceptional circumstances where this would be allowed for brownfield sites only; • If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude; and • The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed. <p>All proposed developments are required to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water.</p>	
Transport Scotland	██████ ██████████ ██████████ ██████████ ██████████	██████████ ██████████████████ ██████████████████ ██████████████████	September 2020	<p>It is acknowledged that any effects on the trunk road network as a result of the proposed OHL are likely to be minimal and limited to the construction period. However, anticipated trip generation has not been detailed in the supporting documentation to provide justification for the exclusion of the assessment of traffic effects from the EIA Report.</p> <p>The proposed preparation of a Construction Traffic Management Plan (CTMP), and the inclusion of an outline CTMP as an appendix to the main EIA Report is advisable.</p> <p>The scoping out of the traffic assessment from the main EIA Report is considered acceptable on the basis that a CTMP will be prepared in support of development proposals. This should quantify the anticipated trip generation over the course of the construction period, providing traffic volumes by vehicle type and month, and detail anticipated construction traffic routes, access requirements and any proposed mitigation measures. The outline and full CTMP should be submitted for</p>	<p>A section covering transportation is set out in Chapter 2: Approach to the EIA, which includes key data. Based on the short term nature of the construction and decommissioning processes, the geographic spread of the construction works on the public road network and SPEN's commitment to appropriate traffic management it is considered that this approach is proportionate.</p> <p>An outline CTMP is provided.</p>



Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				approval by South Lanarkshire Council, in consultation with Transport Scotland.	
Transport Scotland	██████	██████	09/05/22	I can confirm that there are no changes to the scoping advice we provided the Energy Consents Unit previously.	Noted.



APPENDIX 3 – FIGURES

