

**SP Energy Networks**

**Scoop Hill 132kV  
Connection Project  
Routeing and Consultation  
Report**

**Final report**

Prepared by LUC

October 2021



**SP ENERGY  
NETWORKS**

# Contents

<b>Chapter 1</b>		<b>Chapter 6</b>	
<b>Introduction</b>	<b>1</b>	<b>Appraisal Findings</b>	<b>20</b>
Purpose of this Report	1	Technical Review of Emerging Preferred Route Option	20
The Need for the Scoop Hill Windfarm Grid Connection	1	Consideration of Cumulative Effects of Emerging Route Option Preferences	21
SPENs Statutory and Licence Duties	2	Conclusion	21
The Development and Consenting Process	2		
The Structure of the Report	3		
<b>Chapter 2</b>		<b>Chapter 7</b>	
<b>Project Description</b>	<b>4</b>	<b>Consultation Process and Next Steps</b>	<b>23</b>
Connection Requirements	4	The Consultation Process	23
Overhead Line Infrastructure	4	Consultation Strategy	23
Construction Process	5	Next Steps: Route Alignment and Environmental Appraisal	25
<b>Chapter 3</b>		<b>Appendix A</b>	
<b>Approach to Routeing</b>	<b>7</b>	<b>The Holford Rules and SHETL Clarification Note</b>	<b>A-1</b>
SPENs Overall Approach to Routeing	7		
The Scoop Hill Windfarm 132kV Grid Connection Routeing Objective	7	<b>Appendix B</b>	
Established Practice for Overhead Line Routeing	8	<b>Route Options Appraisal Table</b>	<b>B-1</b>
Overview of Routeing Process	8		
Identification and Appraisal of Route Options	9	<b>Appendix C</b>	
Selection of the Preferred Route	9	<b>Appraisal of Landscape Sensitivity to OHL Development</b>	<b>C-1</b>
<b>Chapter 4</b>		<b>Appendix D</b>	
<b>Identification of Route Options</b>	<b>11</b>	<b>Newspaper Advertisement</b>	<b>D-1</b>
The Project Routeing Strategy	11		
The Study Area	11	<b>Appendix E</b>	
Planning Policy Context	12	<b>Project Leaflet</b>	<b>E-2</b>
Identification and Mapping of Routeing Considerations	13		
Identification of Route Options	14	<b>Appendix F</b>	
Description of Route Options	14	<b>Poster</b>	<b>F-1</b>
<b>Chapter 5</b>		<b>Appendix G</b>	
<b>Appraisal of Route Options</b>	<b>16</b>	<b>Consultees</b>	<b>G-2</b>
Approach to Appraisal of Route Options	16		
Appraisal Criteria	17		

# Chapter 1

## Introduction

### Purpose of this Report

**1.1** This document has been prepared by LUC on behalf of SP Energy Networks (SPEN). It relates to the identification and appraisal of route options for a new twin 132 kilovolt (kV) overhead line connection supported on wood poles, from the proposed Scoop Hill Community Wind Farm substation to two new 132kV switchbays at Moffat substation (hereafter referred to as the Scoop Hill 132kV Connection Project). The location of the Scoop Hill 132kV Connection Project is shown on **Figure 1.1**.

**1.2** This report presents the methodology adopted for routeing the Scoop Hill 132kV Connection Project, and the findings of the routeing study, culminating with the description of the 'preferred route' for the OHL connection. This report also sets out the process for the consultation which will be undertaken. This process is designed to gather feedback from stakeholders, including the public, to inform the subsequent stages of the Scoop Hill 132kV Connection Project.

### The Need for the Scoop Hill Windfarm Grid Connection

**1.3** Community Windpower Limited (CWL) proposes to construct and operate Scoop Hill Community Wind Farm comprising up to 75 wind turbines with an output capacity of up to 525 megawatts (MW) approximately 5km south-east of Moffat and 11km north-east of Lockerbie. The construction and operation of the wind farm will require Section 36 consent from Scottish Ministers under the Electricity Act 1989 (the Act) as its generation capacity is greater than 50MW, and an application was made by CWL in November 2020 (ECU reference: ECU00000533). A separate Section 37 consent will be required for the installation and operation of the twin 132kV OHL grid connection for the wind farm.

**1.4** SPEN has a legal duty under the Electricity Act 1989 to provide, develop and maintain a technically feasible and economically viable transmission and distribution system. SPEN also has a duty to provide a connection for new generation (i.e. the proposed Scoop Hill Community Wind Farm) to the wider electricity transmission network.

## SPENs Statutory and Licence Duties

**1.5** As a transmission licence holder for southern Scotland, SPEN<sup>1</sup> is required under Section 9(2) of the Electricity Act 1989 to:

- develop and maintain an efficient, co-ordinated and economical system of electricity transmission; and
- facilitate competition in the supply and generation of electricity.

**1.6** In addition to its statutory and licence obligations to provide for new electricity generators wishing to connect to the transmission system in its licence area, SPEN is also obliged to make its transmission system available for these purposes and to ensure that the system is fit for purpose through appropriate reinforcements to accommodate the contracted capacity.

**1.7** Section 38 and Schedule 9 of the Electricity Act 1989 imposes a further statutory duty on SPEN to take account of the following factors in formulating proposals for the installation of overhead transmission lines:

- *“(a) to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*
- *(b) to do what it reasonably can to mitigate any effects which the proposals would have on the natural beauty of the countryside or any such flora, fauna, features, sites, buildings or objects.”*

**1.8** SPEN's 'Schedule 9 Statement' sets out how it will meet the duty placed upon it under Schedule 9. The Statement also refers to the application of best practice methods to assess the environmental impacts of proposals and to identify appropriate mitigation measures.

**1.9** As a result of the above, SPEN is required to identify electrical connections that meet the technical requirements of the electricity system, which are economically viable, and cause on balance, the least disturbance to both the environment and the people who live, work and enjoy recreation within it.

## The Development and Consenting Process

**1.10** The Scoop Hill 132kV Connection Project comprises three key phases:

- Phase One: Routeing and Consultation.
- Phase Two: EIA Screening and Environmental Appraisal.
- Phase Three: Application for Section 37 consent.

### Phase One: Routeing and Consultation

**1.11** This report relates to Phase One, which comprises a review of environmental, technical and economic considerations and the application of established step-by-step routeing principles to identify and appraise potential route options to establish a 'preferred' route for the OHL.

**1.12** SPEN is committed to ongoing consultation with interested parties, including statutory and non-statutory consultees and local communities. Whilst there is no statutory requirement to consult during the early routeing stages, SPEN nonetheless considers it good practice to introduce consultation at this stage and seek views of consultees and the public to inform the next stages of the project.

**1.13** Responses to the consultation process will be evaluated and the 'proposed' route confirmed for progression to the next stage.

### Phase Two: EIA Screening and Environmental Appraisal

**1.14** The Scoop Hill 132kV Connection Project could be considered an EIA development under Schedule 2 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations). However, due to its nature, size and location with regard to the selection criteria for screening Schedule 2 development presented as Schedule 3 (Regulation 7(2)(a) of the Regulations, an Environmental Impact Assessment (EIA) may not be required.

**1.15** Following confirmation of the Proposed Route, to determine whether the Scoop Hill 132kV Connection Project is EIA development, and therefore whether an EIA is required, SPEN will submit a request for an EIA screening opinion to the Scottish Ministers in accordance with Regulation 8(1) of the Regulations. The request will be accompanied by the relevant information in accordance with Regulation 8(2) and 8(3) and will take into account the selection criteria in Schedule 3 and

<sup>1</sup> SPEN owns and operates the electricity transmission and distribution networks in central and southern Scotland through its wholly-owned subsidiaries SP Transmission plc (SPT) and SP Distribution plc (SPD). SP Transmission plc is the holder of a transmission licence.

The references below to SPEN in the context of statutory and licence duties and the application for section 37 consent below should be read as applying to SP Transmission plc



the findings of the work undertaken to date as part of the routeing process.

**1.16** Should the Scottish Ministers determine that the Scoop Hill 132kV Connection Project is not EIA development, and that subsequent provisions of the Regulations do not apply, SPEN will undertake an environmental appraisal in relation to key topics (to be agreed with consultees) and prepare a supporting Environmental Report to accompany the Section 37 application.

### Phase Three: Application for Consent

**1.17** Following completion of the Environmental Report, SPEN will apply to Scottish Ministers for consent under Section 37 of the Act, as amended, to install, and keep installed, the proposed OHL identified above. In conjunction with the Section 37 application, SPEN will apply for deemed planning permission for the OHL under Section 57(2) of the Town and Country Planning (Scotland) Act 1997, as amended, for any ancillary development such as access tracks or substation facilitation works. The Environmental Report (or Environmental Impact Assessment Report if the Ministers deem the project to be EIA development) will accompany the application.

### Stakeholder Engagement

**1.18** Stakeholder engagement, including public involvement, is an important component of the Scottish planning and consenting system. Legislation and government guidance aim to ensure that the public, local communities, statutory and other consultees and interested parties have an opportunity to have their views taken into account throughout the planning process.

**1.19** Striking the right balance can be challenging, and in seeking to achieve this SPEN recognises the importance of consulting effectively on proposals and of being transparent about the decisions reached. SPEN is keen to engage with key stakeholders including local communities and others who may have an interest in the Scoop Hill 132kV Connection Project. This engagement process begins at the early stages of development of a project and continues into construction once consent has been granted.

**1.20** SPEN's approach to stakeholder engagement for major electrical infrastructure projects is outlined in Chapter 2 of its latest guidance document entitled 'Approach to Routeing and Environmental Impact Assessment'<sup>2</sup>. SPEN aims to ensure effective, inclusive and meaningful engagement with the

public, local communities statutory and other consultees and interested parties through four key engagement steps:

- Information gathering to inform the routeing stage;
- Consultation on specific requirements;
- Obtaining feedback on the preferred route; and
- The Environmental Appraisal stage.

**1.21** In addition, and as noted above, SPEN as a holder of a transmission licence, has a duty under section 38 and Schedule 9 of the Electricity Act 1989, when formulating proposals for new electricity lines and other transmission development, to have regard to the effect of work on communities, in addition to the desirability of the preservation of amenity, the natural environment, cultural heritage, landscape and visual quality.

### The Structure of the Report

**1.22** This report comprises of the following chapters:

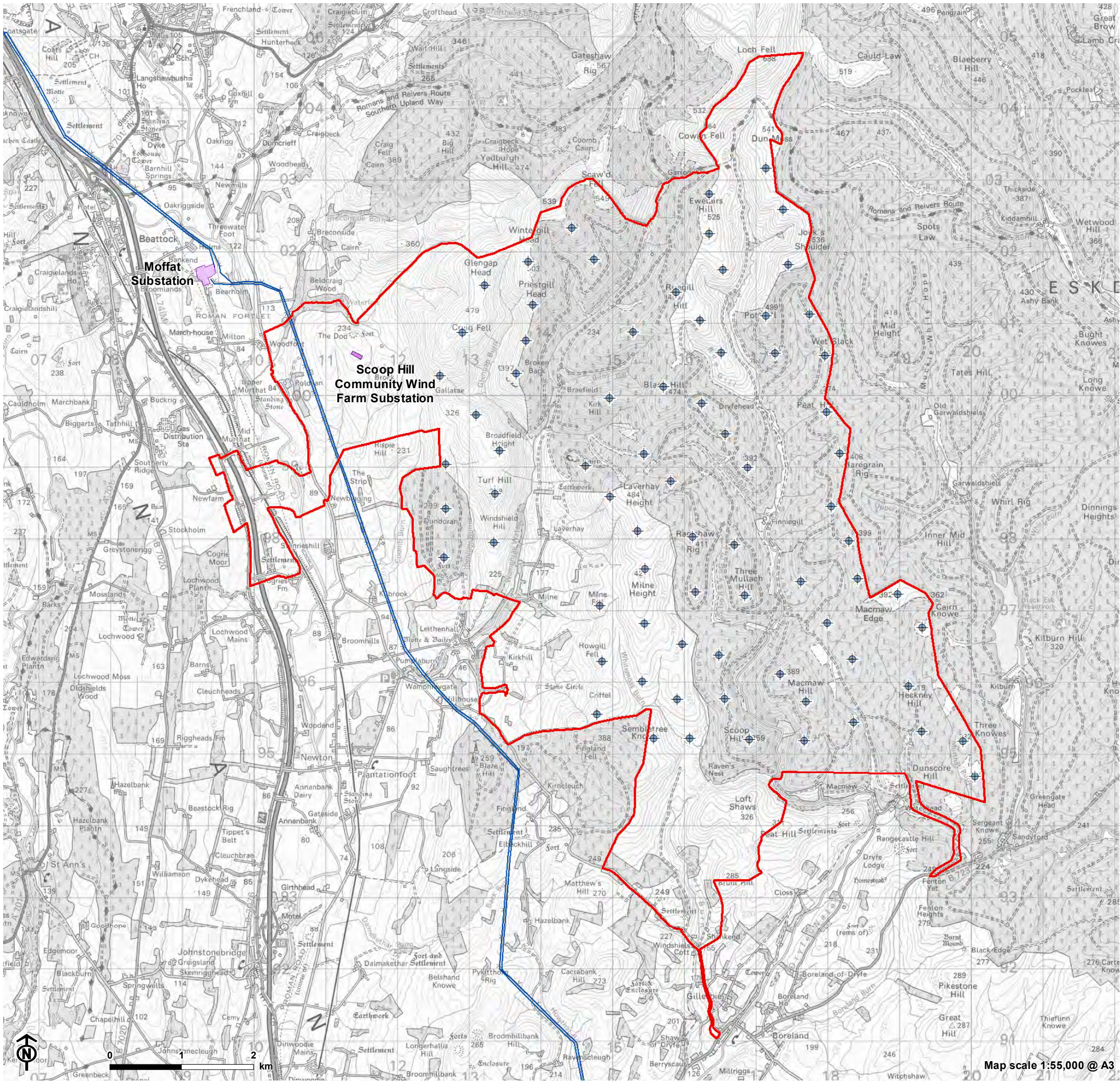
- **Chapter 1: Introduction;**
- **Chapter 2: Project Description;**
- **Chapter 3: Approach to Routeing;**
- **Chapter 4: Identification of Route Options;**
- **Chapter 5: Appraisal of Route Options;**
- **Chapter 6: Appraisal Findings; and**
- **Chapter 7: The Consultation Process and Next Steps.**

**1.23** This report is also supported by figures and appendices as referenced throughout.

<sup>2</sup> ScottishPower Energy Networks (2021), 'Approach to Routeing and Environmental Impact Assessment':

[https://www.spenergynetworks.co.uk/userfiles/file/SPEN\\_Approach\\_to\\_Routeing\\_Document\\_2nd\\_version.pdf](https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_Document_2nd_version.pdf)










**Scoop Hill 132kV Grid Connection  
Routing and Consultation Report  
for SP Energy Networks**



**Figure 1.1: Location Plan**

-  Scoop Hill Community Wind Farm substation
-  Moffat substation
-  Scoop Hill Community Wind Farm site boundary
-  Scoop Hill Community Wind Farm turbine
-  Existing 400kV overhead line (OHL)





## Chapter 2

### Project Description

#### Connection Requirements

**2.1** Given the output capacity of Scoop Hill Community Wind Farm (circa 525MW), and to avoid the need for larger steel towers, the connection will require two 132kV OHLs supported on wood poles connecting from the wind farm substation to the existing Moffat substation. The initial SPEN design is for the two OHLs to run in parallel along the length of the connection route, sharing the output capacity of the wind farm.

#### Overhead Line Infrastructure

**2.2** For the OHLs, conductors (or wires) will be suspended at a specified height above ground and supported by wooden poles, spaced at intervals. Conductors will be made either of aluminium or steel strands.

**2.3** Each OHL will carry one 3-phase circuit, which means that the wood poles will support three conductors. Each conductor will be made of aluminium alloy or steel strands. Insulators attached to the wood pole cross-arms will support the conductors and prevent the electric current from crossing to the pole body.

#### Wood Pole Types

**2.4** Wood poles are fabricated from pressure impregnated softwood, treated with a preservation to prevent damage to structural integrity.

**2.5** There are three types of wood poles:

- *Intermediate poles* where the pole is part of a straight section of line and no change in direction is required. Straight sections of wood poles include section poles where segmentation is required to contain any failure in the OHL;
- *Angle poles* where the OHL requires a change of direction. All angle structures will require to be back stayed; and
- *Terminal pole* where the OHL ends before entry into a substation.

**2.6** Double Trident 'H' wood poles, rather than single 'Trident' wood poles is proposed given the potential weight of

the conductors required for the connection. The Double 'H' poles will allow deviations of up to 75 degrees. The means of terminating the connection into Moffat substation from the twin OHL is not yet confirmed, however it is likely that this will be achieved through using either a wooden four pole terminal structure or a single terminal steel tower, and this will be confirmed as the design progresses. A typical double 'H' pole and an example of a wooden four pole terminal structure are shown in **Figure 2.1**.

### Wood Pole Heights and Span Lengths

**2.7** The standard height of Trident 'H' poles (including steel work and insulators) varies from 10m to 15m.

**2.8** The section of OHL between wood poles is known as the 'span', with the distance between them known as the 'span length'. Span lengths between wood poles average between 80m to 90m but can be increased if there is a requirement to span a larger distance due to the presence of a feature in the landscape such as a river or loch. Approximately 2.5m spacing will be applied between wood poles, whilst spacing between the circuits will be approximately 20m.

**2.9** Wood poles are used to regulate the statutory clearances required for conductor height, which is determined by the voltage of the OHLs (the higher the voltage, the greater the safety clearance that will be required) and the span length between wood poles. A safety clearance of 40-50m will be applied on the ZV route. A minimum clearance corridor of approximately 80-90m will be required taking into account the ZV clearance and stand-off distance between each new OHL.

### Wood Pole Colour

**2.10** Wood poles are dark brown when first erected and weather to a silver/grey after a period of about five years.

**2.11** The wood pole top cross-arms are galvanised steel and support the aluminium conductors on stacks of grey insulator discs. Both the steelwork and aluminium will weather and darken after a few years.

### Moffat Substation

**2.12** The Scoop Hill 132kV Connection Project will require the electrical capacity of Moffat substation to be increased. This will be achieved by installing a new 400/132kV transformer, and two 400kV and 132kV circuit breaker bays. The typical dimensions for the new transformer unit that will be installed within the existing substation compound are 20m x 7.5m x 11m. As part of the Section 37 application for consent, SPEN will seek a direction from Scottish Ministers under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997 (as amended) that the associated works at Moffat substation be deemed to be granted.

## Construction Process

**2.13** The construction of the two 132kV OHLs will require additional temporary infrastructure such as temporary accesses to pole locations and construction compounds to store materials. All will have no operational maintenance requirements and are all subject to well-established procedures for dismantling/decommissioning.

### Wood Pole Construction

**2.14** The construction of the two OHLs will follow a well-established sequence of activities as outline below:

- Preparation of accesses and felling of woodland to allow safe operation of the OHLs;
- Excavation of foundations;
- Wood pole delivery;
- Erection of wood poles;
- Delivery of conductors and stringing equipment;
- Insulator and conductor erection and tensioning; and
- Clearance and reinstatement.

### Access

**2.15** Prior to constructing the OHLs, temporary accesses will be constructed, as necessary, and laydown/storage areas established at suitable intervals. Any trees which may impact on safety clearances will be removed or lopped. Following commissioning of the OHLs, all equipment and temporary access of construction areas will be removed with the land being reinstated to the satisfaction of the landowner.

### Temporary Working

**2.16** Temporary working areas will be required for the duration of construction works. Temporary vehicular access is required to every wood pole location. Wood pole locations will have a working area of approximately 30m x 15m. In some cases the shape or size of the working area will be determined by nearby environmental or land use constraints, identified during the Environmental Appraisal process/ prior to construction. Following the completion of construction works, the temporary working area will be reinstated and restored to former conditions.

### Construction Timescales

**2.17** The total duration of construction activity at any double 'H' pole wood pole location is approximately one day depending on ground conditions and location. Angle poles can take longer due to the need for 'stay wires' to stabilise the pole in the ground.

### Operation and Maintenance

**2.18** Whilst most OHL components are maintenance free, exposed elements which suffer from corrosion, wear, deterioration and fatigue may require inspection and periodic maintenance. OHL conductors generally require refurbishment after approximately 40 years.

**2.19** Any felled wayleave areas will also have to be managed to maintain the required clearances whilst the connection remains in service. Walkover surveys or flyovers will identify where there is a requirement to clear wayleaves of new growth.

### Decommissioning

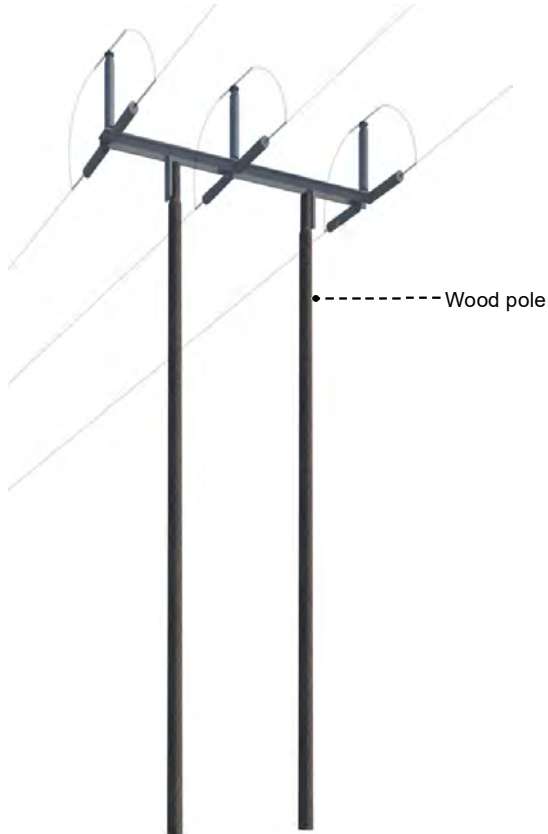
**2.20** Upon decommissioning of Scoop Hill Community Wind Farm, the wood poles will be removed in their entirety, with components re-used where possible. All ground disturbance will be fully reinstated.



Figure 2.1: Typical Wood Pole (Component Parts of 132kV 'Trident' Design Wood Pole)



Component parts of 132kV 'Trident' design wood pole: Intermediate (H pole)



Component parts of 132kV 'Trident' design wood pole: Angle (H pole)



Component parts of 132kV 'Trident' design wood pole: Terminal (H pole)

## Chapter 3

### Approach to Routeing

#### SPENs Overall Approach to Routeing

**3.1** The Government, Ofgem and the electricity industry, including SPEN, have reviewed their positions on OHLs. They remain of the view that the need to balance economic, technical and environmental factors, as a result of statutory duties and licence obligations, continues to support an OHL approach in most cases.

**3.2** It is therefore SPEN's view that wherever practical an OHL approach is taken when planning and designing new transmission lines. However, SPEN accepts that there are specific circumstances in which an undergrounding approach should be considered.

**3.3** In May 2021, SPEN published the second version of its Approach to Routeing and Environmental Impact Assessment document outlining the approach taken to routeing transmission infrastructure<sup>3</sup>. Every project broadly follows the well-established and sequential step-by-step process summarised in **Figure 3.1** below. One key change from the previous 2015 version is the consideration of Biodiversity Net Gain (BNG) and how SPEN will seek to integrate this into the routeing, EIA/Environmental Appraisal, and project delivery stages to ensure that projects contribute to its business targets for biodiversity enhancement. The routeing work for the Scoop Hill 132kV OHL Connection Project was undertaken before the publication of the latest guidance, however BNG will be fully considered in the detailed design process as well as in the EIA/Environmental Appraisal.

#### The Scoop Hill Windfarm 132kV Grid Connection Routeing Objective

**3.4** In accordance with SPEN's approach to routeing, the routeing objective for the Scoop Hill 132kV Connection Project is:

*"To identify a technically feasible and economically viable route for continuous twin 132kV overhead lines supported on wood poles from the proposed Scoop Hill Community Wind Farm to two new 132kV switchbays at*

<sup>3</sup> Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment (2<sup>nd</sup> version, May 2021) Available [online] at:

[https://www.spenergynetworks.co.uk/userfiles/file/SPEN\\_Approach\\_to\\_Routeing\\_Document\\_2nd\\_version.pdf](https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_Document_2nd_version.pdf)

*Moffat substation. The route should, on balance, cause the least disturbance to the environment and the people, who live, work and enjoy recreation within it."*

## Established Practice for Overhead Line Routeing

**3.5** SPEN's overall approach is based on the premise that the main effect of an OHL is visual, as a result of its scale relative to objects in the vicinity such as buildings and trees, and that as there is no technical way of reducing this other than choice of support (towers and/or poles), and only limited ways of achieving screening through planting, the most effective way of causing least visual disturbance is by careful routeing. In addition, a well routed OHL takes account of other environmental and technical considerations, even if the length is increased as a consequence.

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

**3.7** The Holford Rules and the NGC and SHETL clarification notes are included in **Appendix A**. These guidelines for the routeing of new high voltage overhead transmission lines form the basis for routeing the Scoop Hill 132kV Connection Project. Key principles of the Holford Rules include avoiding prominent ridges and skylines, following broad wooded valleys, avoiding settlements and residential properties and maximising opportunities for 'backclothing' infrastructure.

**3.8** For simplicity, the routeing methodology is set out in a linear manner (as shown in **Figure 3.1**), with the findings of each step informing the next step, building up an ever-increasing level of understanding to inform the routeing process. However, it is important to note that this process remains iterative, with the steps subject to a technical review and consultation where necessary. This enables assumptions to be confirmed and ensures confidence in the findings, prior to the commencement of subsequent steps.

## Overview of Routeing Process

### Study Area

**3.9** A study area is first defined, which is large enough to accommodate all likely route options, taking account of the technical requirements (i.e. connection points) and factors such as topography. Baseline mapping of the routeing considerations outlined below then enables routeing constraints and opportunities to be identified.

### Environmental Considerations

**3.10** Statutory duties imposed by Section 38 and Schedule 9 of the Electricity Act 1989 require licence holders to seek to preserve features of natural and cultural heritage interest, and to mitigate where possible, any effects which their proposals may have on such features. The construction and operation of an overhead transmission line will have potential effects on people and the environment, including potential effects on (in no hierarchical order):

- visual amenity;
- landscape character;
- ecology and ornithology;
- hydrology, hydrogeology, geology and water resources;
- cultural heritage; and
- land uses including committed development and forestry.

**3.11** Some effects can be avoided or limited through careful routeing. Other effects are best mitigated through local deviations of the route, the refining of wood pole locations and/or specific construction practices. These are reviewed as part of the environmental appraisal process.

### Technical Considerations

**3.12** Technical considerations which can influence routeing include the existing and proposed electricity transmission network (such as the existing 400kV OHL crossing the study area), slope gradient, waterbodies (such as the River Annan) and other wind farms.

### Economic Considerations

**3.13** In compliance with the duties imposed on SPEN in terms of Section 9 of the Electricity Act 1989, the proposed route must be 'economically viable'. This is interpreted by SPEN as meaning that as far as is reasonably practicable, and all other concerns being equal, the line should be as direct as possible and the route should avoid areas where technical difficulty or compensatory requirements would render the scheme



unviable on economic grounds i.e. where undergrounding of the route would be required in the vicinity of other OHLs.

## Identification and Appraisal of Route Options

**3.14** Following identification of the study area a number of possible 'route options' for the Scoop Hill 132kV Connection Project are identified. This process involves the avoidance where possible of areas of highest 'amenity' value. These areas generally include areas of natural and cultural heritage value designated at a national, European or international level as these are afforded the highest levels of policy protection.

**3.15** Given the limited areas of highest amenity value present within the study area, the process also includes the consideration of areas that are of more local or regional importance and are smaller in scale, which may not necessarily be designated at a national level.

**3.16** The study area also includes consideration of matters such as altitude and slope gradients, over which technical limitations would mean a route was unachievable.

**3.17** The route options are then appraised against environmental and technical criteria, including the length of the proposed route option and the existence of other OHLs.

## Selection of the Preferred Route

**3.18** The comparative appraisal of route options leads to identification of an 'emerging preferred route' which is subjected to a technical review by SPEN to confirm that the emerging preferred route (on environmental grounds) is also technically feasible. At this stage the emerging preferred route is also subject to a review of potential cumulative effects with other proposed connections within the study area, as outlined below. Following the cumulative review, with associated revisiting or modification of routes as necessary, the 'preferred route' is selected.

**3.19** The preferred route is the option which is considered to be the most technically feasible and economically viable whilst causing the least disturbance to the environment and to people. This is then taken forward for stakeholder and public consultation. The preferred route is subjected to further consideration in response to public and landowner consultation, and may be modified further in the light of these consultations. Modifications may result in further consultation if necessary.

**3.20** The preferred route, modified to take into account consultations and the consideration of specific local issues, is then confirmed as the 'proposed route'. The proposed route is subjected to further environmental survey, detailed design and subsequent environmental appraisal, which may result in

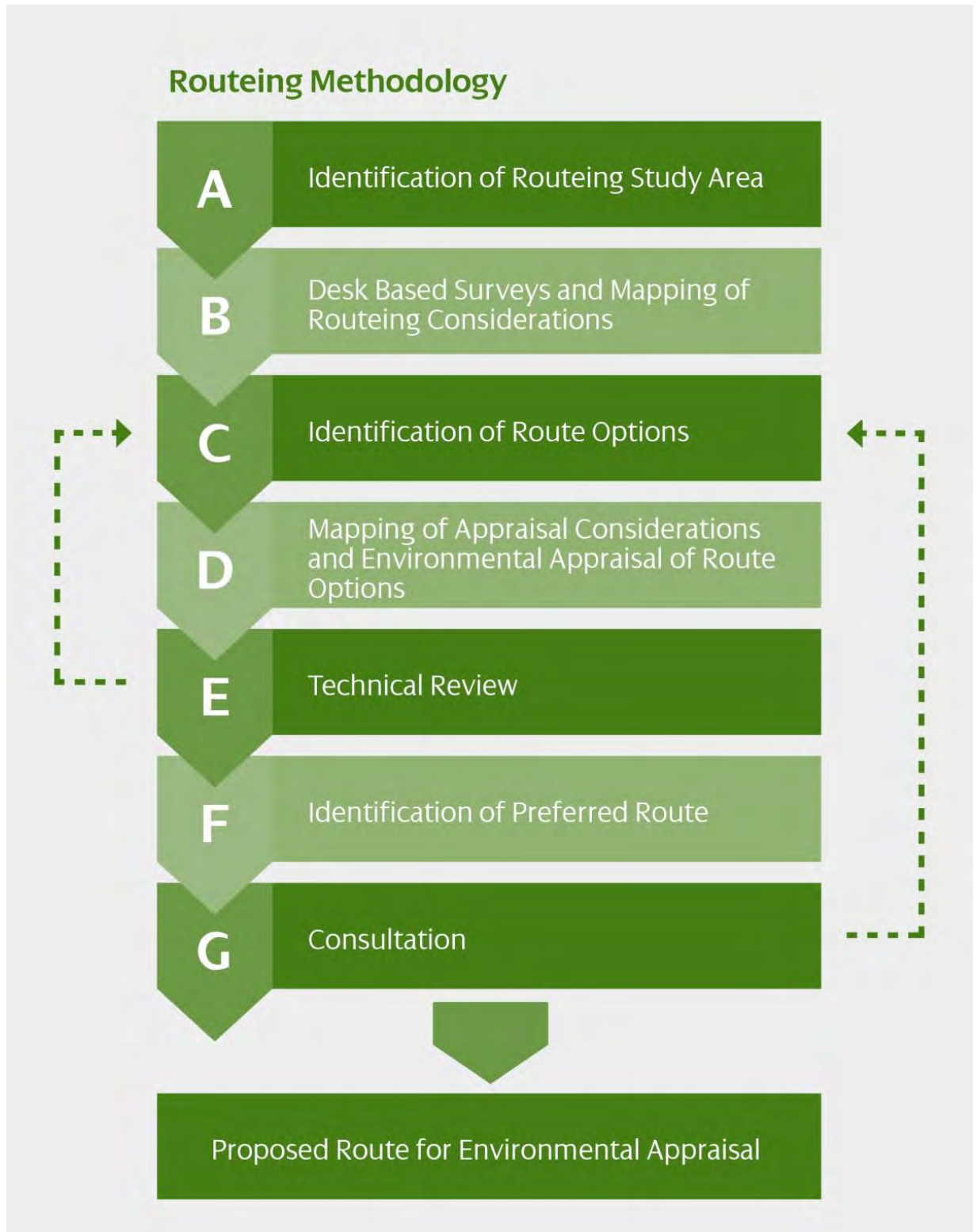
further modifications to avoid and/or minimise effects on the environment.

## Cumulative Review

**3.21** SPEN's technical review reflects the objectives of seeking to avoid unnecessary crossing of OHLs (existing and proposed), maintaining the required safety clearance between OHLs during construction and operation, and design requirements reflecting the topographic conditions and other characteristics of the study area.

**3.22** At this stage, the existing 400kV OHL running through the study area is likely to be a key appraisal consideration and factor in identifying the preferred route. The cumulative situation within the study area is reviewed regularly during the appraisal of route options to ensure that the appraisal process responds in a timely manner to any forthcoming changes.

Figure 3.1 Routeing Methodology



## Chapter 4

# Identification of Route Options

### The Project Routeing Strategy

**4.1** The routeing strategy, which has informed the identification and appraisal of the route options is:

*"Route options will take account of the grain of the local landscape, making use of appropriate crossing points of the River Annan, woodland cover and lower ground through Annandale to avoid areas of highest amenity value and sensitivity as far as possible. Proximity to residential properties and other forms of development within the study area will also require consideration to limit potential visual and cumulative effects".*

### The Study Area

**4.2** The first step in the routeing process involved identification of the study area, predominantly for the purposes of gathering data specific to the project area. In identifying the study area, it was important to ensure that this was large enough to accommodate all potential route options reflecting the Routeing Objective and Routeing Strategy.

**4.3** On the basis of the Routeing Objective, the study area was required to be able to accommodate continuous twin 132kV OHLs from the Scoop Hill Community Wind Farm proposed substation to the Moffat substation.

**4.4** A preliminary check was also carried out to identify the presence of International, European or Nationally Designated areas within or immediately adjacent to, the study area, to ensure that potential effects on these areas could be considered or, most importantly, avoided through the modification of the study area. Taking account of the above, and also informed by topography, the maximum area across which the potential route options were likely to be located, was identified. The study area is shown in **Figure 4.1**.

### Study Area Description

**4.5** The study area is within the council area of Dumfries and Galloway. The landscape of the study area is varied, and extends broadly from the proposed Scoop Hill Community Wind Farm substation in the south-east to Moffat 132kV substation in the north-west, in the upper

reaches of Annandale. To the east of the study area, the foothills of the Southern Uplands at Eskdalemuir contain the eastern valley side. Landcover typically consists of rough pasture and open moorland. To the west, the landscape comprises the broad, typically pastoral valley floor of the River Annan. The River Annan flows from north to south along the western edge of the study area. The narrow and incised southern extents of Moffat Dale skirt the northern edge of the study area.

**4.6** In terms of topography the western part of the study area generally comprises the lower lying and more settled agricultural valley of the River Annan. The eastern part of the study area is characterised by more elevated land, featuring smooth rounded hills (see **Figure 4.1**). These hills form a transitional landscape between the low-lying Annandale and the eastern foothills of the Southern Uplands at Eskdalemuir. The elevation range across the study area is between approximately 81m Above Ordnance Datum (AOD) in the lower south-western reaches of the valley floor, while the hill summits to the east include high points of 360m AOD at Breckonside Hill, 240m at Brock Hill and 234m AOD at the Dod.

**4.7** In terms of land use and landcover, the study area comprises mainly agricultural land. Broadleaf woodland flanks sections of the River Annan, and there are other areas of broadleaf and mixed woodland throughout the study area, most notably at Beldcraig Wood in the centre of the study area which includes an area of Ancient Woodland. Western parts of the study area feature loosely rectangular to irregular shaped fields bound by post and wire fences, hedgerows and low stone walls. To the east, the higher ground is characterised by rough pasture and open moorland and used for grazing.

**4.8** Whilst Annandale is characterised by numerous settlements and isolated farmsteads, settlement in the study area is relatively sparse with a small number of scattered residential properties and farmsteads located along minor roads along the floor of the River Annan valley and on the lower slopes of hills to the east. Across the study area, residential properties include Breckonside Cottage and Breckonside to the north; and Braehead, Woodfoot, Poldean Bridge and Poldean to the south-west. There is also a small cluster of properties at Milton Farm, on the western fringes of the study area. The closest settlements are Moffat and Beattock, beyond the study area to the north-west. Minor roads and farm tracks link the properties to the east of the River Annan. To the west of the River Annan, outwith the study area, the M74, B7076

and the West Coast Main Line all pass along the valley floor.

**4.9** In terms of existing development, an existing 400kV Scotland – England Interconnector OHL supported by steel lattice towers extends north-west to south-east across the centre of the study area, crossing the River Annan at Bearholm. The 400kV OHL connects to Moffat substation on the western bank of the River Annan.

**4.10** The northern extents of the study area fall within the locally designated Moffat Hills Regional Scenic Area (RSA). Views into, and along, Moffat Dale and the more incised upper reaches of Annandale on the western and southern extents of the RSA are noted in the Regional Scenic Areas Technical Paper<sup>4</sup>. 'Fine views' across the valley from the A701 towards the Moffat Hills are also recognised. In terms of recreational access there are no long-distance trails or Core Paths within the study area. The Southern Upland Way and the Romans and Reivers Walking Route pass to the north. Within the study area, an informal footpath passes through Beldcraig Wood.

## Planning Policy Context

### Local Planning Policy

**4.11** The Local Development Plan (LDP) covering the study area is the Dumfries and Galloway Local Development Plan 2<sup>5</sup> (adopted in October 2019).

**4.12** The Dumfries and Galloway LDP sets a spatial strategy in which to guide the future use and development of land in towns, villages and the rural area for the next 20 years. It also provides a snapshot of where development should happen and where it should not. The LDP sets out this strategy through planning policies, which outline the criteria by which proposals' acceptability will be considered. The policies are structured around the themes of economic development, housing, historic environment, natural environment, community services and facilities, infrastructure and transport. The LDP recognises the importance of delivering supporting infrastructure for renewable energy developments in Dumfries and Galloway in order to contribute to the wider Scottish Government's decarbonisation ambitions.

<sup>4</sup> Dumfries and Galloway Council, Regional Scenic Areas Technical Paper (Local Development Plan 2) January 2018

<sup>5</sup> Dumfries and Galloway Council, Local Development Plan (LDP2) October 2019

## National Planning Policy

**4.13** The Third National Planning Framework (NPF3)<sup>6</sup>, which was laid in the Scottish Parliament on 23rd June 2014, is the current spatial expression of the Scottish Government's Economic Strategy and plans for infrastructure investment and development priorities over the next 20 to 30 years. NPF3 strengthens the link between strategy and delivery through 14 national development priorities identified within Annex A. In relation to development priority number four of Annex A, 'An Enhanced High Voltage Electricity Network', the statement of need is as follows: *"These classes of development are needed to support the delivery of an enhanced high voltage electricity transmission grid which is vital in meeting national targets for electricity generation, statutory climate change targets, and security of energy supplies."* In terms of the description of Classes of Development it includes, new or upgraded onshore electricity cabling of or in excess of 132kV as constituting national development.

**4.14** The Planning (Scotland) Act 2019 elevates the status of the National Planning Framework from material consideration to being part of the development plan. The Act also includes a planning purpose for the preparation of the NPF, being *"to manage the development and use of land in the long-term public interest"*. Work has already begun on NPF4 and the Government published an Interim Position Statement in Autumn 2020. The draft version of NPF4 is expected to be laid before the Scottish Parliament in Autumn 2021 with the final version being adopted in spring/summer 2022. As a result of the adoption of the Planning (Scotland) Act 2019, the next NPF will incorporate Scottish Planning Policy and will have enhanced status as part of the statutory development plan. Until this time, NPF3 remains the relevant publication for the national planning framework.

**4.15** Scottish Planning Policy (SPP) was published in June 2014 and is a statement of Scottish Government policy on nationally important development and land use planning. In general terms, SPP seeks to direct the right development to the right places and guide new infrastructure to appropriate locations.

**4.16** SPP sets out a policy principle which *"introduces a presumption in favour of development that contributes to sustainable development"* (SPP, page 9). It is further noted in paragraph 29 that decisions should be guided by *"supporting climate change mitigation and adaptation"*. This is considered to now have even more weight in the

planning balance given the Scottish Government declaring a climate emergency.

## Identification and Mapping of Routeing Considerations

**4.17** The Holford Rules are broadly hierarchical, with Rule 1 deemed the first rule to be considered in routeing. Rule 1 relates to the avoidance, where possible, of *"major areas of highest amenity value"*. Holford Rule 2 makes the following recommendation: *"avoid smaller areas of high amenity value or scientific interest by means of deviation"*.

**4.18** As the Holford Rules do not define what constitutes a major area (Rule 1), and the importance of the area is irrespective of size, smaller areas of highest amenity value were also mapped at this stage alongside larger areas.

**4.19** The Holford Rules do not identify which designated areas constitute areas of *highest amenity value*. However, SHETL clarification note b) (see **Appendix A**) states that areas of highest amenity value *"require to be established on a project-by-project basis considering Schedule 9 of the Electricity Act, 1989"*, and provides examples to be considered.

**4.20** In this routeing study, the term 'environmental' has also been used in place of 'amenity' (with the exception of residential amenity) to reflect more recent thinking which also seeks to recognise the intrinsic value of such areas.

**4.21** There are no 'areas of highest environmental value' (Holford Rule 1) located within the study area, and therefore national level designations have not influenced this routeing process. The closest national level designation is Milton Roman Fort Scheduled Monument (SM676) which is directly adjacent to the west of the study area. The setting of the Scheduled Monument is a key consideration for the route options appraisal.

**4.1** As noted in **Chapter 3**, and reflecting the Holford Rules, additional considerations can be introduced into the appraisal to help inform the selection of a preferred route option. These areas of 'regional and local amenity value' may be of more local importance and smaller in scale.

**4.2** The SHETL note a) on Holford Rule 2 (see **Appendix A**) states these areas of 'regional or local high amenity value' should be identified from Development Plans. For this routeing study, the other areas which have been considered are shown on **Figure 4.2** and comprise:

<sup>6</sup> The Scottish Government, The National Planning Framework (2014) available [online] at: <http://www.gov.scot/Publications/2014/06/3539>



- Areas of Ancient Woodland (AW) as defined by the Ancient Woodland Inventory (AWI);
- Areas of Native woodland of Scotland (NWS) as defined by the National Woodland Survey of Scotland;
- Regional Scenic Areas<sup>7</sup>; and
- Non-Statutory Designated Archaeology of Regional / Local Importance.

**4.3** These have been mapped where present and treated as 'avoid where possible', or where not possible, 'balance with other considerations'.

**4.4** Supplementary Note a) of the Rules relates to residential areas, stating "*avoid routeing close to residential areas as far as possible on grounds of general amenity*".

**4.5** There are no Settlements, defined as towns and villages identified within the Local Development Plan within the study area.

**4.6** In this routeing study, residential properties have been mapped and treated as areas of highest environmental value to be avoided.

**4.7** Whilst it is recognised that proximity to properties is not an absolute constraint to routeing, a 150m 'trigger for consideration' has been mapped around each residential property to allow this proximity to be balanced with other considerations, while also helping identify possible 'pinch points'.

**4.8** At this stage, there has been no other committed developments identified within the study area in addition to the proposed Scoop Hill Community Wind Farm. Committed developments, including wind farm proposals, will be kept under review as these could form an environmental constraint to routeing, and also as a technical constraint due to the requirement for a separation distance between turbines and the OHLs.

**4.9** The existing grid network as well as waterbodies including the River Annan and flood risk have also been taken into consideration in the appraisal of route options. There is no Class 1 or 2 peat or areas of best and most versatile agricultural land (Classes 1, 2 and 3.1) within the study area that needs to be considered in the appraisal of route options.

**4.10** The angle of slope for the placement of wooden poles are mapped comprising >22 degrees for wooden poles.

The slope angle and topography of the study area is also shown on **Figure 4.2**.

## Identification of Route Options

**4.11** Given the nature of overhead transmission lines, the primary environmental effects are likely to be landscape and visual effects. The best way to limit adverse effects on landscape and visual amenity is by careful line routeing, led by landscape architects, based on professional judgement and informed by fieldwork.

**4.12** Holford Rules 1 and 2, as described above, formed the basis for the landscape led identification of route options. In addition, Rules 4 and 5 of the Holford Rules identify that OHL infrastructure is judged to be more widely visible from surrounding areas when located on higher ground, for example ridges and skylines. Holford Rule 3 which states that, other things being equal, the most direct line should be chosen, with no sharp changes in direction, is also taken account of in identifying route options. The presence of residential properties within the study area and the 150m 'trigger for consideration' also played a key role in identifying route options.

**4.13** Following a desk-based mapping exercise to define potential route options based on the environmental and technical constraints, a site visit was undertaken by LUC's landscape architects in June 2020 to further refine the potential route options for taking forward to the appraisal stage. Five route options have been identified between the two connection points, and an overview is shown in **Figure 4.3**. At this stage, these are considered to be 'corridors' which could potentially accommodate a twin OHL with an 80m-90m wayleave.

## Description of Route Options

**4.14** Each of the route options were given a numerical reference 1-5. All route options have the same connection points, commencing at the Scoop Hill Community Wind Farm substation and terminating at the Moffat 132kV substation. **Figures 4.3a-e** show each of the individual route options.

### Route Option 1

From the proposed substation to the south of the minor summit of The Dod, the route option travels north-east and then in a north-westerly direction across the lower western flank of Craig Fell and Breckonside Hill, crossing minor tributaries associated with Beldcraig Burn. The route option

<sup>7</sup> The Moffat Hills Regional Scenic Area (RSA) is located within the northern extents of the study area and will be taken account of during the route options appraisal stage.

passes over the wooded upland valley of Breckonside Burn and around the high ground to the north of the property cluster at Breconside. The route option then drops down the south-western flank of Crocket Height and passes over a minor road. The route option continues to drop in elevation crossing the River Annan and the existing 400kV OHL, passing through low lying farmland before linking into the northern side of Moffat substation (see **Figure 4.3a**).

#### Route Option 2

From the proposed substation to the south of the minor summit of The Dod, the route option travels north-east then in a north-westerly direction across the lower western flank of Craig Fell and Breckonside Hill, crossing minor tributaries associated with Beldcraig Burn. The route option then turns west, crossing over Beldcraig Burn valley (south of the property cluster at Breconside) and through NSWW woodland to the north of Beldcraig Wood. The route option continues west crossing the ridge south of Crocket Height. The route option then drops down the south-western flank of Crocket Height and passes over a minor road. The route option continues to drop in elevation crossing the River Annan and the existing 400kV OHL, passing through low lying farmland before linking into the northern side of Moffat substation (see **Figure 4.3b**).

#### Route Option 3

From the proposed substation to the south of the minor summit of The Dod, the route option travels north-west dropping in elevation over the north-western flank of the hill. The route crosses the forested Beldcraig Burn valley at a similar point to the existing 400kV OHL. The route option then broadly parallels the existing 400kV as it drops down the valley side to the east of Annadale River, passing over a minor road, crossing the River Annan and passing through low lying farmland before linking into the northern side of Moffat substation (see **Figure 4.3c**).

#### Route Option 4

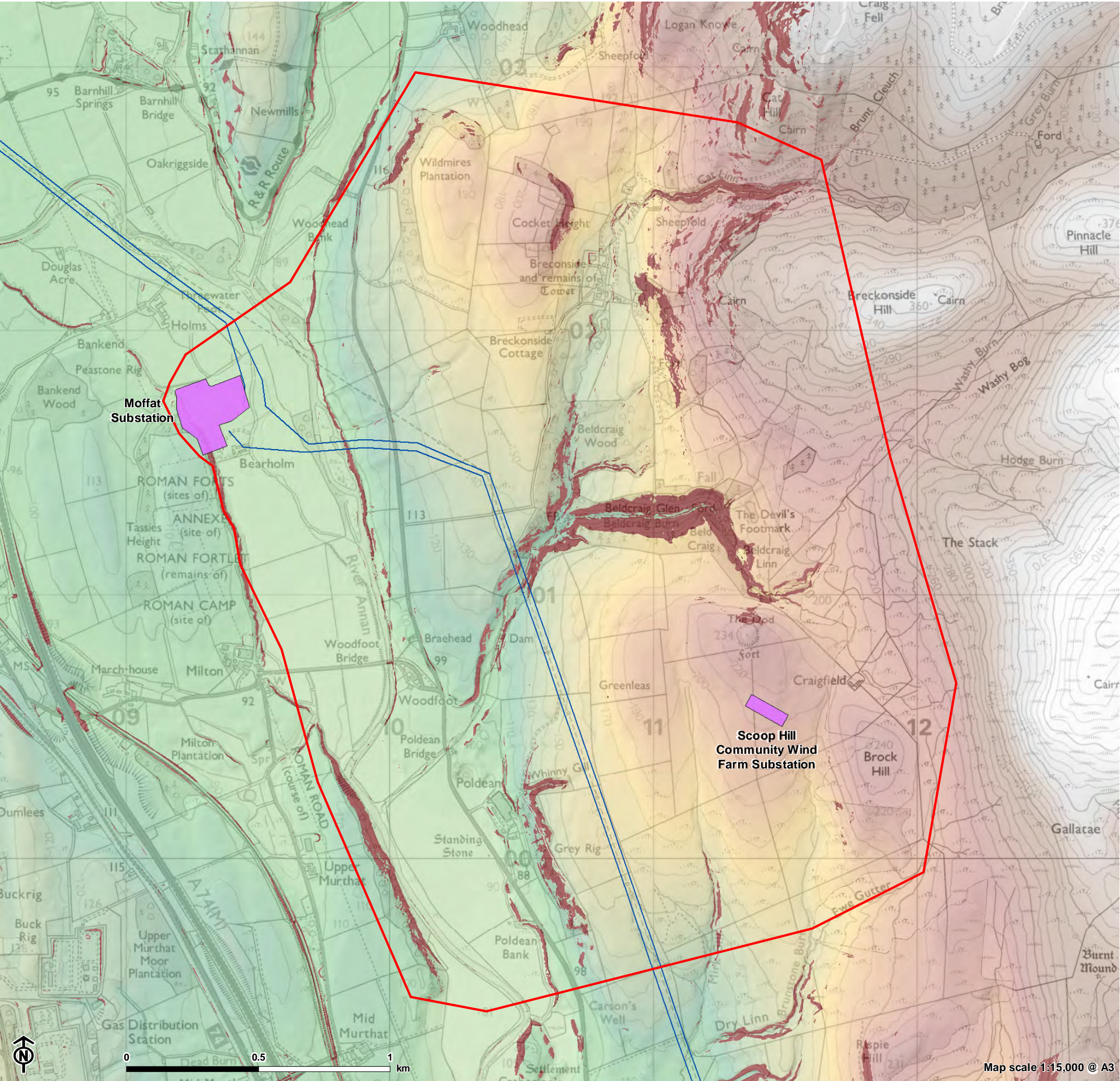
From the proposed substation to the south of the minor summit of The Dod, the route option travels north-west dropping in elevation over the north-western flank of the hill. The route crosses the forested Beldcraig Burn valley at a similar point to the existing 400kV OHL and crosses the OHL. The route option continues west, dropping in elevation and crossing the River Annan north of the property of Braehead. Woodland alongside the River Annan at this point is NSWW. The route option then turns north-west passing through low lying farmland before crossing the 400KV OHL again at Bearholm and linking into the northern side of Moffat substation (see **Figure 4.3d**).

#### Route Option 5

From the proposed substation to the south of the minor summit of The Dod, the route option travels south-west dropping in elevation over the south-western flank of the hill. The route option crosses the existing 400kV OHL and then turns west dropping in elevation and crossing a minor road. The route option then heads north-west, across the valley floor crossing to the west of the properties of Poldean and Poldean Bridge. The route option crosses Beldcraig Burn and River Annan (woodland alongside the River Annan at this point is NSWW) before crossing the existing 400kV OHL again at Bearholm and linking into the northern side of Moffat substation (see **Figure 4.3e**).



Figure 4.1: Study Area





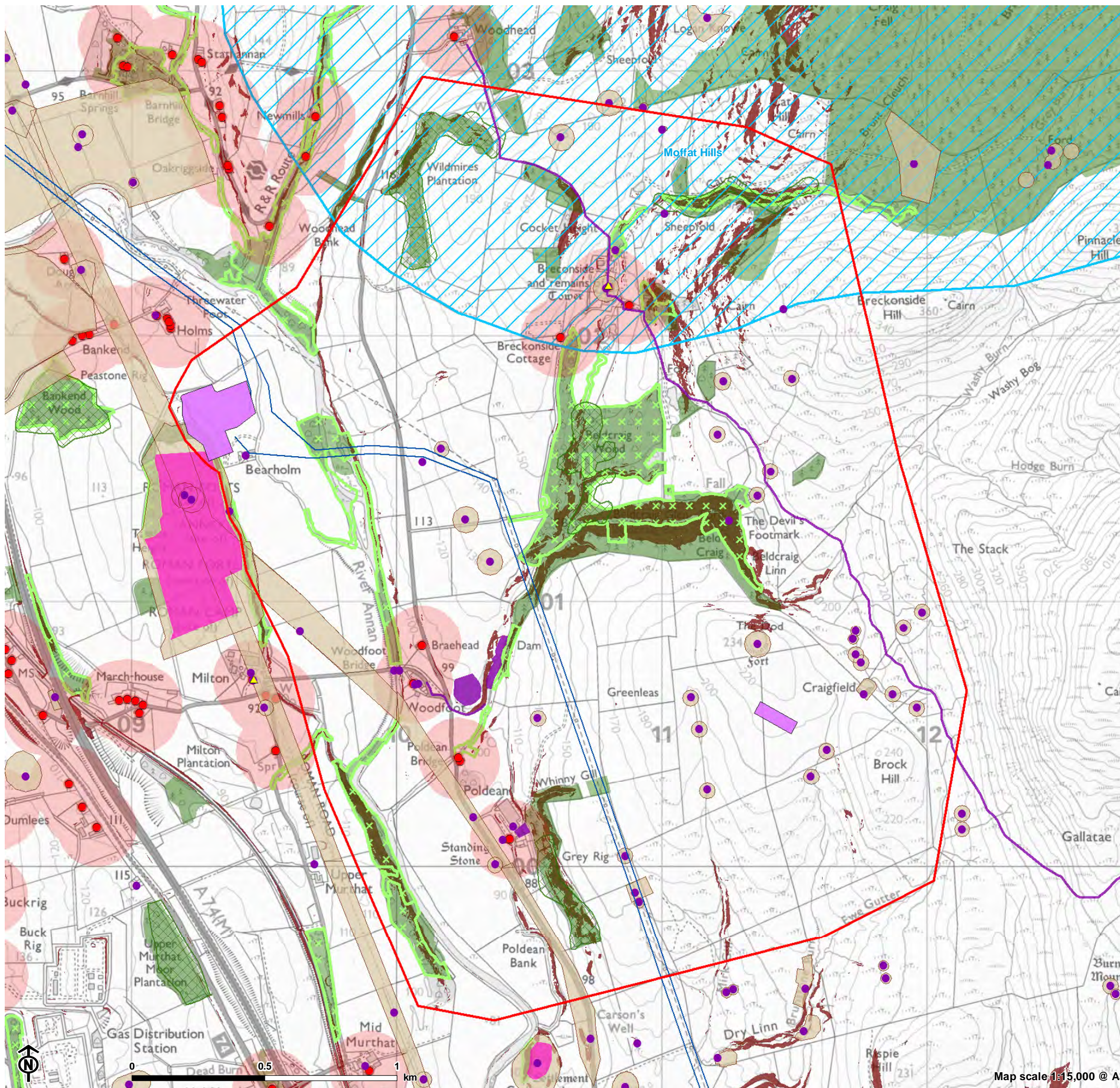


Figure 4.2: Routeing Considerations

- Study area
- Substation
- Existing 400kV overhead line (OHL)

#### Routeing Considerations

- ▲ Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Slope > 22 degrees





Figure 4.3: Route Options

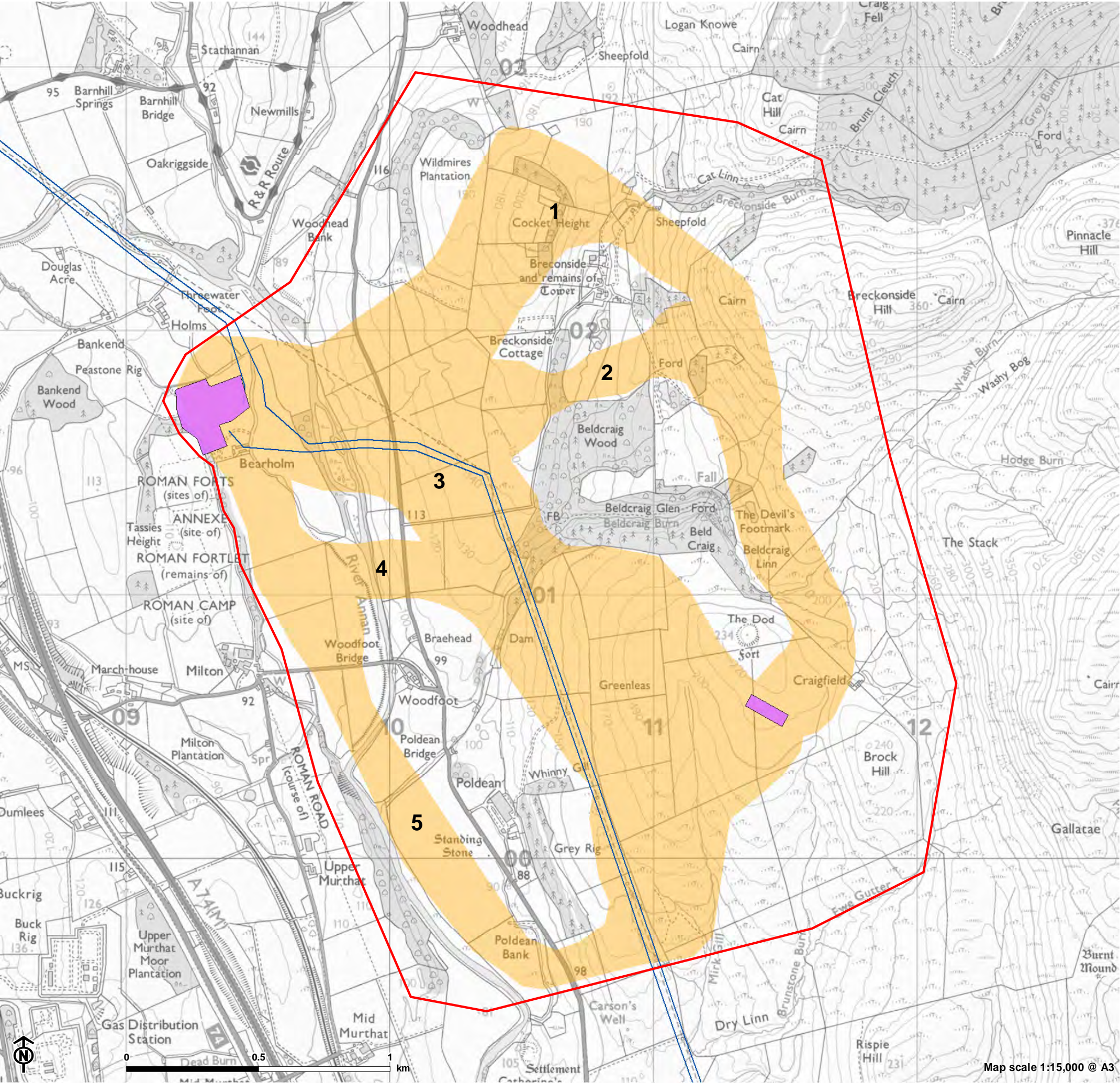
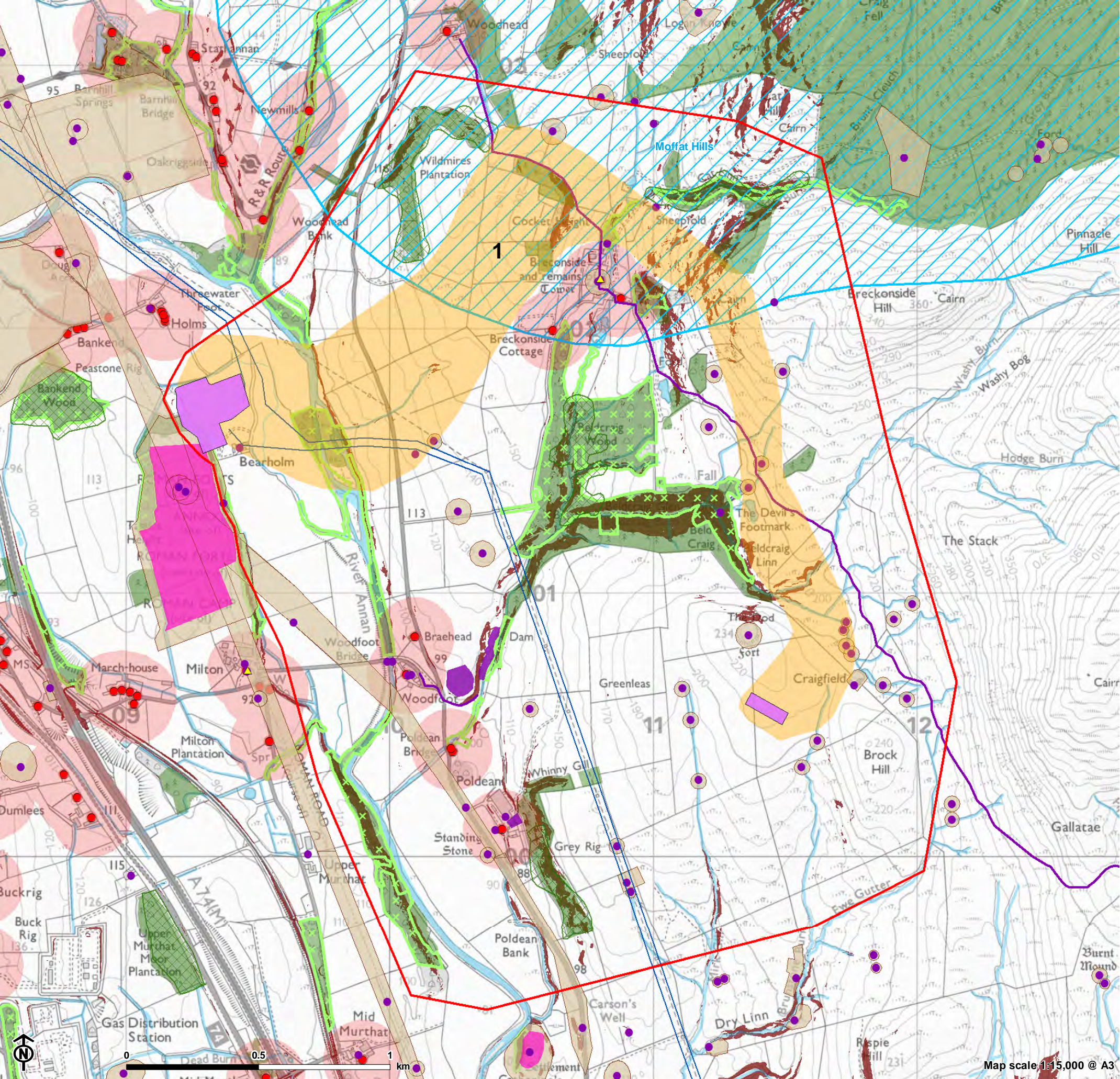




Figure 4.3a: Route Option 1



- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option

**Routing Considerations**

- ▲ Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Watercourse
- Slope > 22 degrees



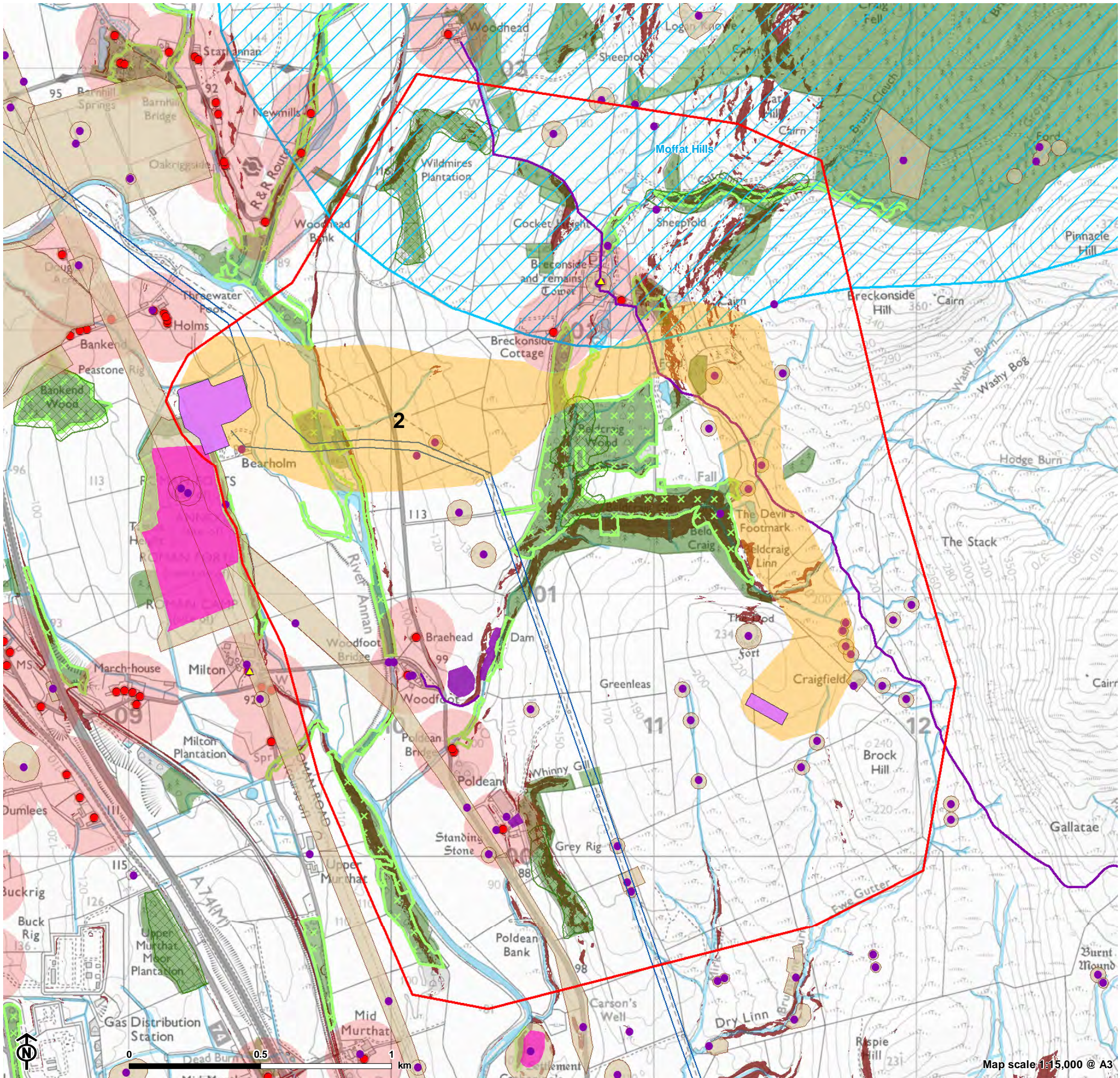


Figure 4.3b: Route Option 2

- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option

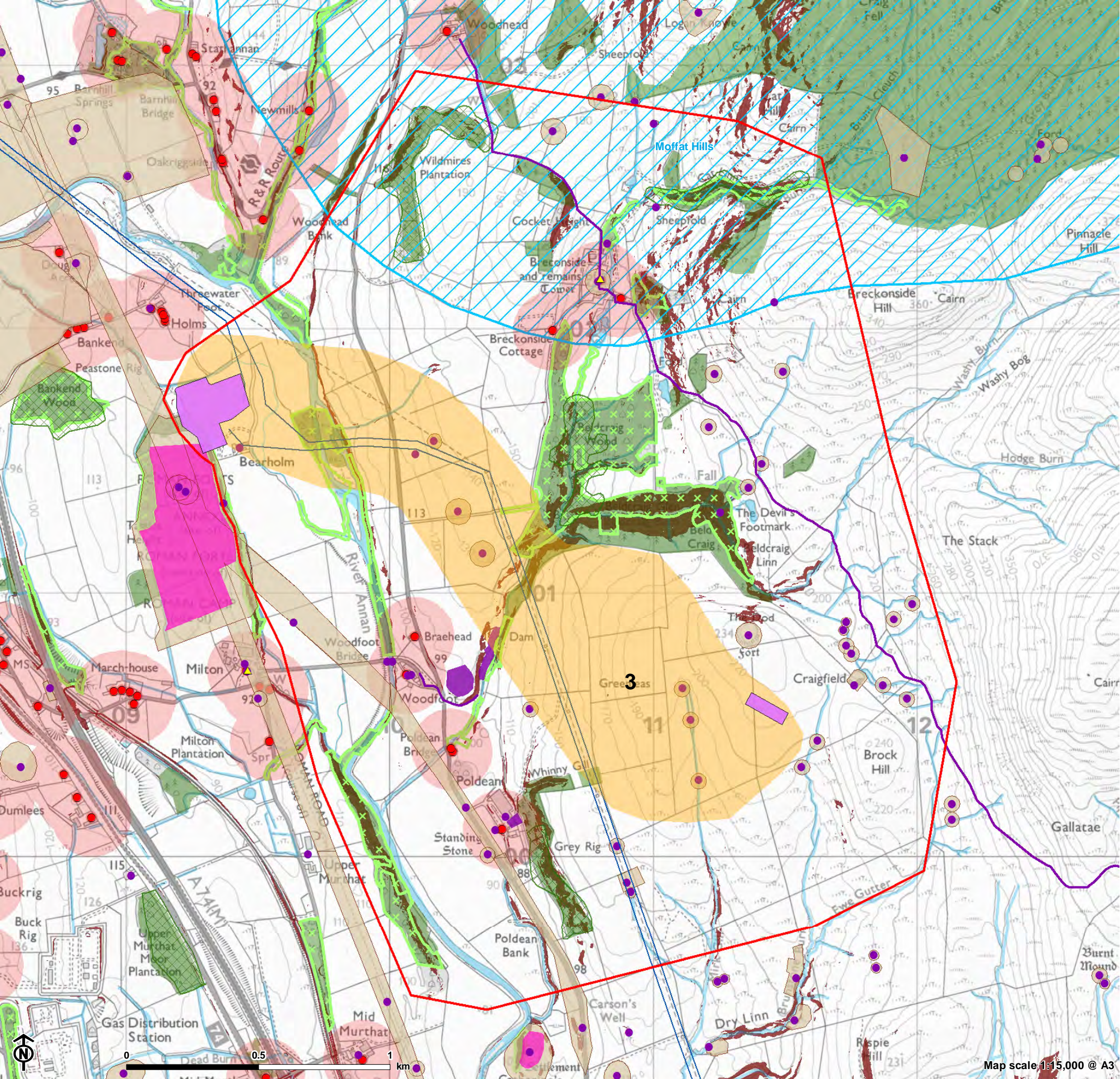
**Routing Considerations**

- Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Watercourse
- Slope > 22 degrees





Figure 4.3c: Route Option 3



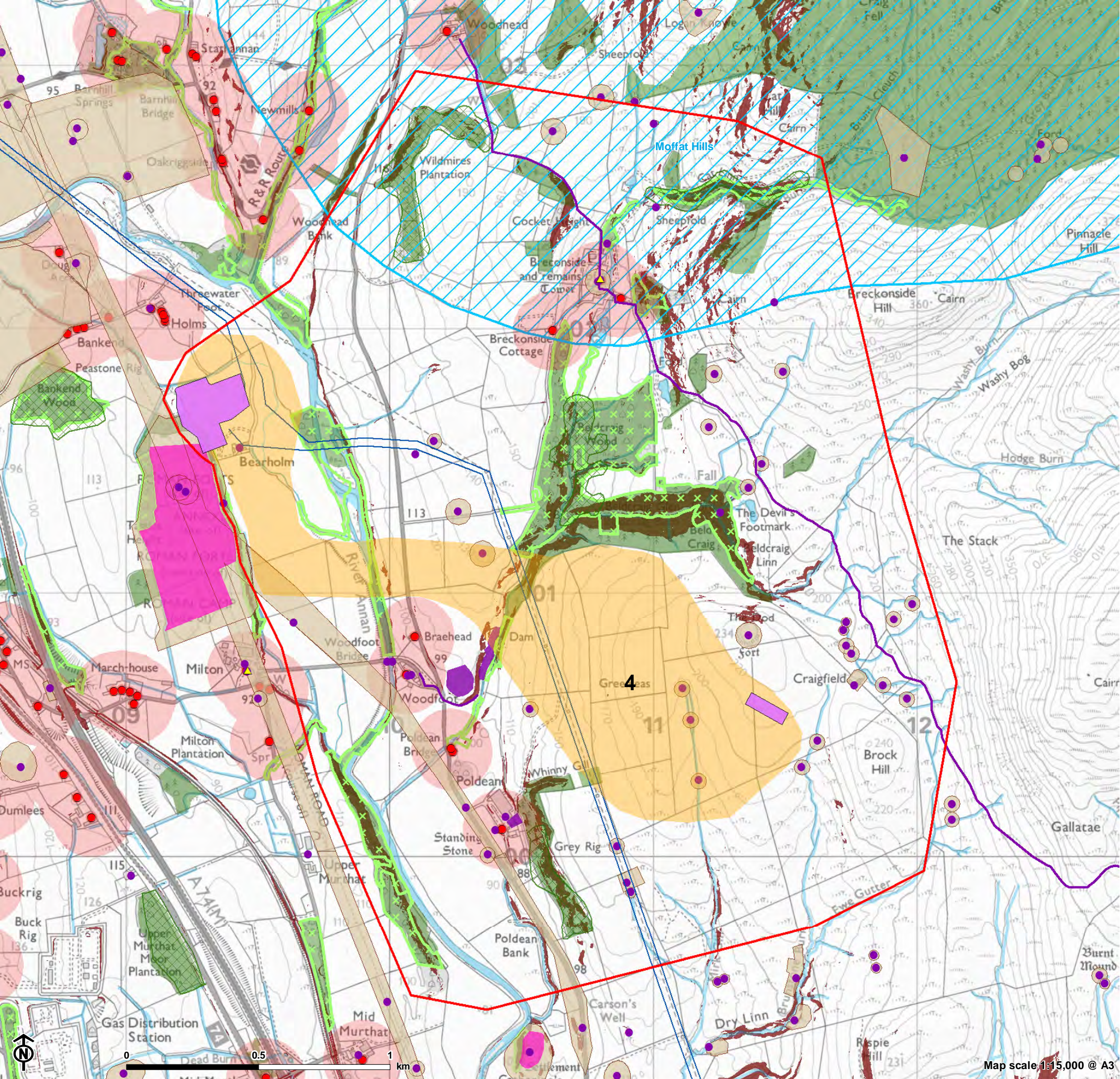
- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option

**Routing Considerations**

- ▲ Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Watercourse
- Slope > 22 degrees



Figure 4.3d: Route Option 4



- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option

**Routing Considerations**

- ▲ Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- x Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Watercourse
- Slope > 22 degrees



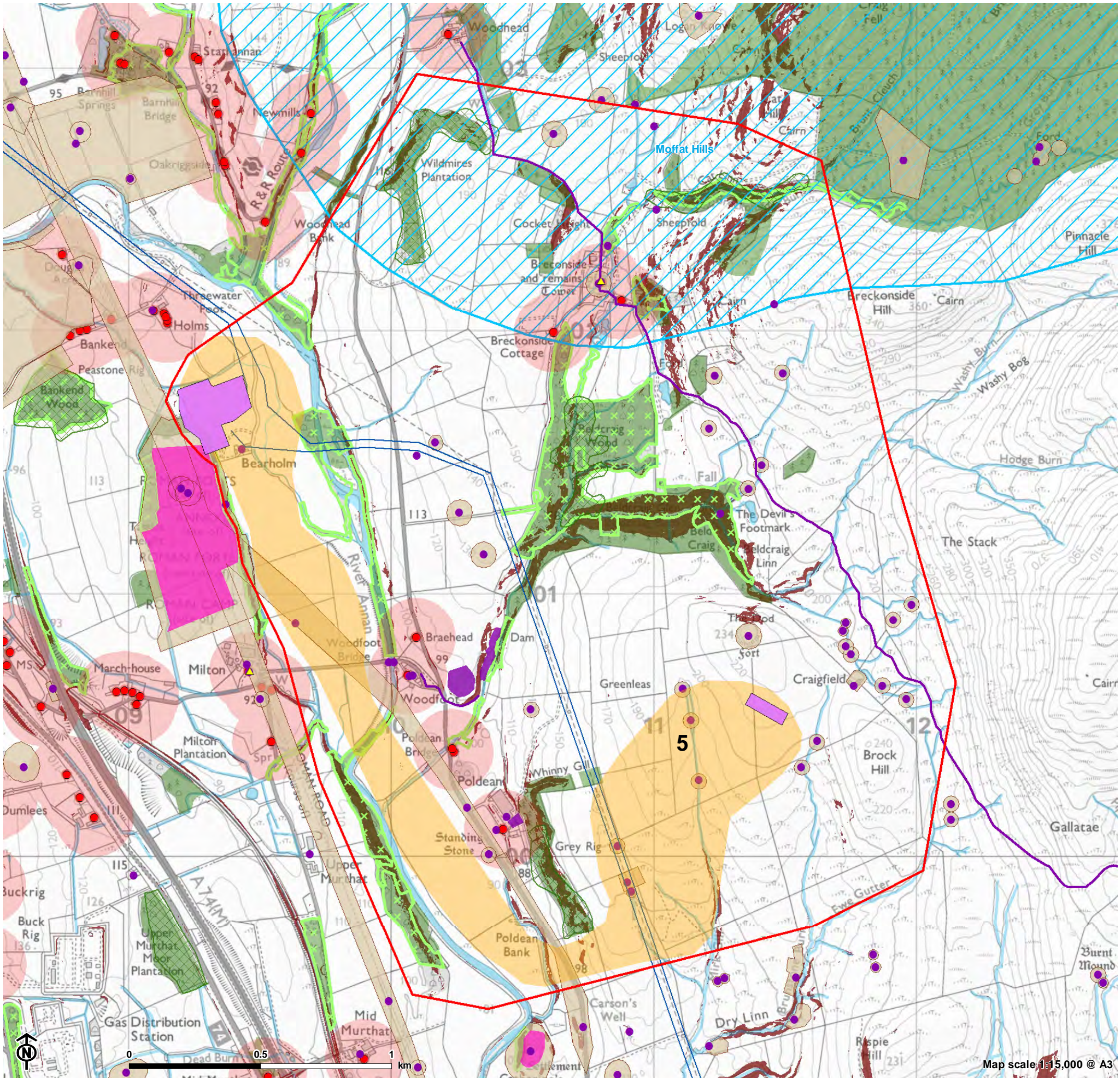


Figure 4.3e: Route Option 5

- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option

**Routing Considerations**

- ▲ Listed Building - Category C
- Scheduled Monument (SM)
- Historic Environment Record
- Areas of Archaeological Interest
- Moffat Hills Regional Scenic Area (RSA)
- Ancient Woodland Inventory (AWI)
- Native Woodland (NWSS)
- National Forestry Inventory (NFI)
- Residential property
- Residential property - 150m buffer
- Watercourse
- Slope > 22 degrees



## Chapter 5

# Appraisal of Route Options

### Approach to Appraisal of Route Options

**5.1** The objective of the appraisal of the route options was to identify a preferred route for the Scoop Hill 132kV Connection Project, in a comparable, documented and transparent way to identify an overall preferred route option which best achieves the aims of the Routeing Objective and Routeing Strategy.

**5.2** As outlined in the Routeing Strategy, where the characteristics of the study area were such that they required to be balanced to enable the overarching Routeing Objective to be met, professional judgement, informed by both desk studies and field work, and reflecting the Holford Rules, was employed to identify the preferred route. This professional judgement was made on a case by case basis.

**5.3** The process also sought to:

- Continue to reflect the overall Routeing Objective and Routeing Strategy;
- Continue to reflect SPEN's Approach to Routeing and EIA document;
- Continue to reflect the Holford Rules for Routeing Overhead Transmission Lines;
- Draw out distinctions between the routes to enable the relative strengths and weaknesses of each to be identified.

**5.4** The comparative appraisal of route options was undertaken in stages as set out below:

- Identification of appraisal criteria, together with their reasoning for inclusion;
- Application of appraisal criteria to each route option, following the appraisal methodology;
- Comparative appraisal of route options to identify a preferred route;
- SPEN technical review, reflecting system design requirements;
- Cumulative appraisal with other OHL connections within the study area (where relevant).



## Appraisal Criteria

**5.5** Based on the established practice for line routeing, the route options were appraised using the following criteria, which continue to reflect the key considerations of the routeing methodology specific to this project:

- Length of Route;
- Landscape and Visual Amenity;
- Hydrology,
- Forestry;
- Biodiversity and Geological Conservation;
- Cultural Heritage; and
- Land Use.

**5.6** The reasoning for the use of these criteria and an outline of the methodology for appraising each route option is set out below.

### Length of Route Option

**5.7** Holford Rule 3 states that “*other things being equal choose the most direct line*”. Although this rule primarily relates to avoiding sharp changes in direction, and therefore the need for more visually intrusive angle poles, choosing the most direct route may result in fewer adverse effects, than a longer, less direct route (taking due consideration of other constraints).

### Landscape and Visual Amenity

**5.8** Consideration of landscape sensitivity is given, with reference to both the susceptibility of the landscape to the type and scale of OHL development proposed, and the value attributed to the landscape through formal designation or otherwise, informed by published baseline landscape character information.

**5.9** The SNH (now NatureScot) digital map-based national Landscape Character Assessment (published in 2019) has been used as the basis for determining the susceptibility of Landscape Character Types (LCTs) across the study area (refer to **Figure 5.1a**). This was supplemented by information contained within published landscape capacity studies and observations made during fieldwork to appraise the relative landscape ‘fit’ of each route option.

**5.10** The Local LCTs found across the study area are shown on **Figure 5.1b**, and the findings of the landscape sensitivity appraisal are presented in **Appendix C** (and shown on **Figure 5.1c**).

**5.11** There are no landscape designations comprising ‘areas of highest environmental value’ (Holford Rule 1) within the study area. However, landscape areas of ‘high’ environmental value (Holford Rule 2), afforded landscape designation and protection at a local level (i.e. the Moffat Hills), is found across the northern extents of the area.

**5.12** Non-residential visual amenity as experienced by those in the wider landscape, e.g. travelling along roads/ tracks and working in the landscape, was also a factor in the appraisal of route options. This allowed consideration of topography, potential back-clothing and visual prominence to be considered (similar to Holford Rule 4).

**5.13** In relation to residential visual amenity, the following were considered: (1) the number of properties in proximity to the route option; (2) where the route option might encroach within the 150m ‘trigger for consideration zone’; and (3) the implications for principal views from individual properties.

**5.14** Consideration was also given to tourism receptors such as promoted/ key recreational viewpoints and promoted routes such as core paths. No OS promoted viewpoints, National Cycling Network (NCN) routes, core paths, long distance trails or known tourist attractions are present within the study area. The Annandale Way, Roman and Reivers Route and the Southern Upland Way are within 1km from Routes 1 and 2 whilst the NCN route 74 is within 1km of Route 5. There are also several core paths within 3km of the study area. These promoted paths may experience visibility of the OHL and will be considered.

**5.15** Landscape and visual receptors are shown in **Figure 5.1a**.

### Hydrology

**5.1** In relation to potential conflicts with policy relating to flooding and to avoid potential increase to flood risk, using the SEPA online flood mapping tool, the medium likelihood events were identified. This considers a flood event that is likely to occur on average once in every two hundred years (1:200) or has a 0.5% chance of happening in any one year. When appraising the route options, the ability to span the 200-year floodplain (average span of 100m for wood pole) was considered. The appraisal considered the potential to cross the flood zone at the narrowest point, all other environmental/ technical considerations being equal.

**5.2** The waterbodies/watercourses, which the route options cross, or are in proximity to were also considered during the appraisal process (see **Figure 5.3**). For data licencing reasons, the SEPA 1:200 year flood risk zones is not shown on **Figure 5.3**, however these can be viewed at the following link:

<https://www.sepa.org.uk/environment/water/flooding/flood-maps/>.

### Forestry

**5.3** Forest areas within each of the route options were identified through the use of aerial photography, combined with digital data available from NatureScot and Scottish Forestry (SF) sources.

**5.4** These forests were then divided into three groupings:

1. Conifer Forest (National Forest Inventory).
2. Ancient and Semi Natural Woodland sites (ASNW).
3. Native Woodlands from the Native Woodland Survey of Scotland (NWSS).

**5.5** Appraisal against forestry criterion comprised analysis of the extent and location of each forest type within the route options to identify net areas for these three forest types.

**5.6** In general terms, the objective in identifying a preferred route is based on identifying the lowest impact for all three types of forest<sup>8</sup>. This requires a subjective review which places greater weight on reducing the impact on types 2 and 3 ahead of type 1. This reflects the importance of the local resource of these woodland types and as such, the implications of the proposed removal of this type of forest within the wayleave (area of forestry felled to accommodate the OHL). In addition, for the ASNW forest designated areas, consideration was given as to whether this forest type was commercial forestry planted on an ancient forest site, rather than native forest. Whilst the importance of this is recognised in terms of the opportunity to restore these sites, it is deemed to merit less weight than the removal of NWSS.

**5.7** In undertaking the appraisal, consideration was given as to whether or not the ASNW and NWSS forest can be avoided during the route alignment/ environmental appraisal stage, assuming that the final wayleave within forestry will be up to 80m in width (i.e. 30m on either side of the OHL with 20m between the two sets of wood poles). Due to the often scattered and broken nature of natural forests, there is frequently the opportunity to avoid areas through careful consideration of the line alignment. Consideration will also be given to minimising impacts on forestry at the route alignment stage, taking account of the need to create long term stable forest edges and to minimise impacts on any forestry management practices.

**5.8** During the alignment/ Environmental Appraisal stage, consideration will be given to all three forest types through:

- Taking account of existing, and planned, wind firm boundaries to minimise sterilisation of commercial woodland areas and reduce the requirements for additional felling outwith the wayleave;
- Taking account of forest design plans and liaising with forestry owners/managers to avoid, or reduce restrictions on forest management operations/techniques e.g. maintaining access to woodland blocks for harvesting/safety; and
- Identification of opportunities to retain and/or plant particularly lower growing shrub species within the wayleave.

**5.9** Forestry resources considered in the appraisal are shown in **Figure 5.2**.

### Biodiversity and Geological Conservation

**5.10** There are no international or national designations (Ramsar, SPA, SAC and SSSI) or priority peatland habitat (Class 1 or 2 as identified in SNH's Carbon and Peatland Map 2016) within the study area.

**5.11** There is only a regionally designated site within the study area and no local designations. The Central Southern Uplands Environmentally Sensitive Area (ESA) covers the majority of the study area, as shown in **Figure 5.3**. This area has been designated for the purpose of conserving, protecting and enhancing environmental features of the area by the maintenance or adoption of agricultural methods.

**5.12** Other species such as breeding Schedule 1 birds (outwith the boundaries of designated sites), European Protected Species (such as otters), and other nationally protected species, such as water vole and badger, will be considered during the detailed alignment of the proposed route and subsequent appraisal stage, informed by the findings of the field surveys. A combination of the siting of wood poles and mitigation measures during construction will ensure no significant disturbance effects on these species, such that their presence will not affect the routing of the OHL.

### Cultural Heritage

**5.13** Designated heritage assets of national significance within and 3km from the study area have been identified

<sup>8</sup> The area of forestry (NWI) and native woodland (NWSS) affected is estimated based on comparison between the mapped data and aerial photography.

using data obtained from Historic Environment Scotland's (HES) Historic Environmental Portal. Additionally, information on non-designated heritage assets of local and regional significance within the same study parameters was obtained from the Dumfries and Galloway Historic Environment Record (HER) in July 2020<sup>9</sup>.

**5.14** The process for appraising a route option was based on identifying the heritage assets that may be affected either as a consequence of physical effects or setting change, based on the above baseline data. This was examined to provide an understanding of the cultural significance for each asset before identifying the likely effects the proposed route options could have on that significance.

**5.15** When appraising the route options, where a route was located within proximity to, or not able to avoid designated heritage assets, the implications of this in relation to potential direct effects have been highlighted within the appraisal. During this stage, routes which also contained known non-designated heritage assets (recorded in the HER as points and areas obtained from Dumfries and Galloway Council in July 2020) were also mapped and taken account of in the appraisal. Consideration was given to avoid direct impacts on both buried and upstanding heritage assets, in particular those of national importance.

**5.16** Potential effects of the route options on the setting of heritage assets, have been assessed by initially identifying non-designated assets within the study area and designated assets within 3km of the route options. Heritage assets were 'screened' using professional judgement to identify and appraise those with the potential to experience an effect on their setting. Setting can be integral to the cultural significance of an asset, therefore a change in an important element of an asset's setting represents a direct impact on its significance.

**5.17** The cultural heritage features included in the appraisal are shown in **Figure 5.4**.

## Land Use

**5.18** Committed development data has been obtained from Dumfries and Galloway Council using the online planning portal (<https://dumgal.gov.uk/planning>) to review live applications and consents. This was last accessed on 31<sup>st</sup> August 2021. With the exception of the proposed Scoop Hill Community Wind Farm turbines, no areas of committed development within or in close proximity to the

route options were identified, and so these have not been mapped or considered in the route appraisal process.

**5.19** Existing and approved wind farms also constitute 'Committed Development'. There are no existing or consented wind farms or turbines within or adjacent to the study area for which a 'trigger for consideration' zone of 3 x the rotor diameter (for assessing 'wake effects' would need to be included in the appraisal of the route options.

**5.20** Land Capability for Agriculture classes 1, 2 and 3.1 in Scotland are referred to as 'Best and Most Versatile' land (with regards to agricultural productivity), and are afforded protection from development. There are no class 1, 2 and 3.1 within the study area, therefore agriculture as a land use has not informed the route appraisal process.

<sup>9</sup> Sites of archaeological interest, areas of archaeological sensitivity, conservation areas and non-inventory gardens and designed landscapes



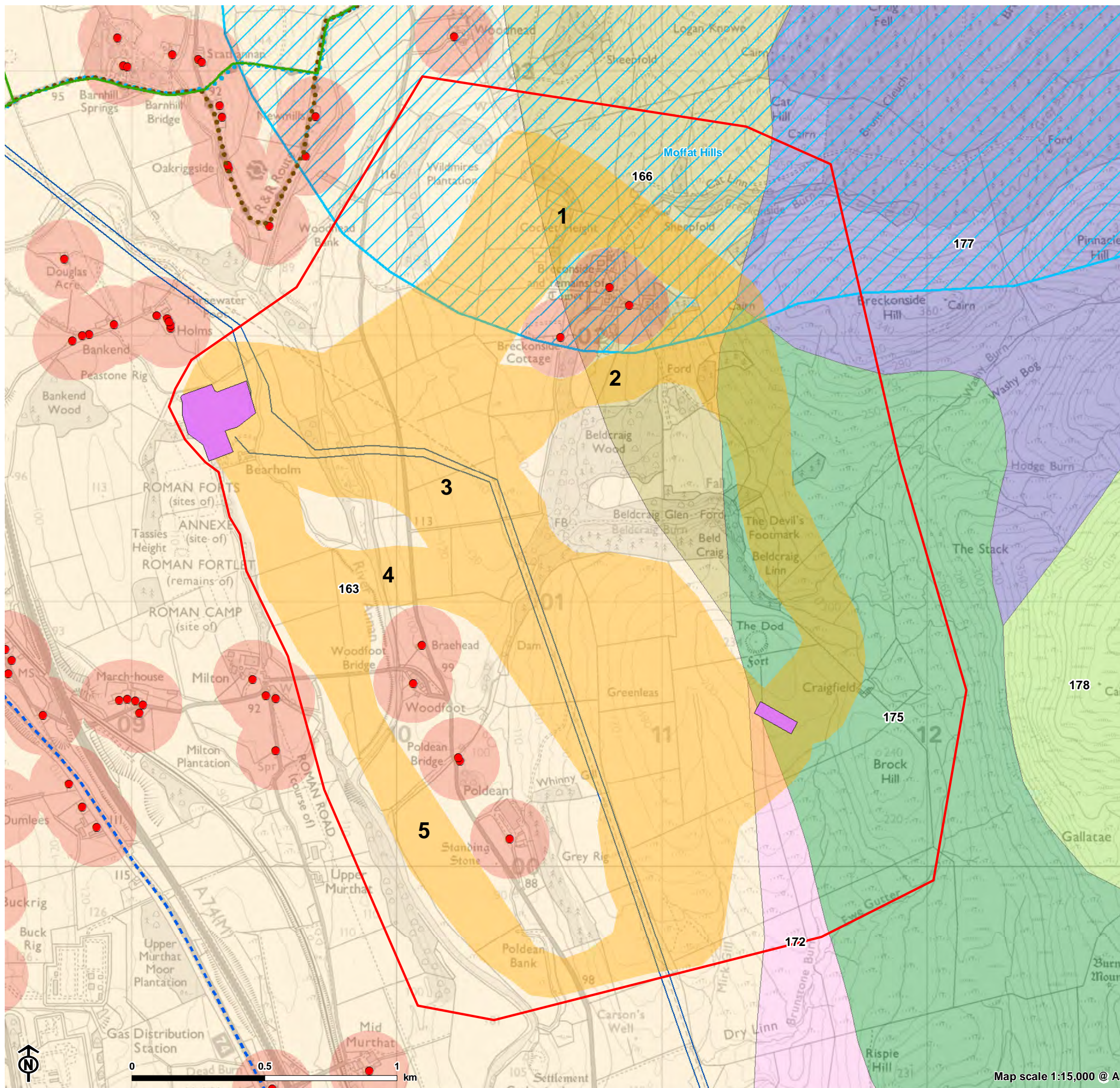


Figure 5.1a: Landscape Designations, NatureScot National Landscape Character Types and Visual Receptors

- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Options

#### Landscape Designations and NatureScot National Landscape Character Types

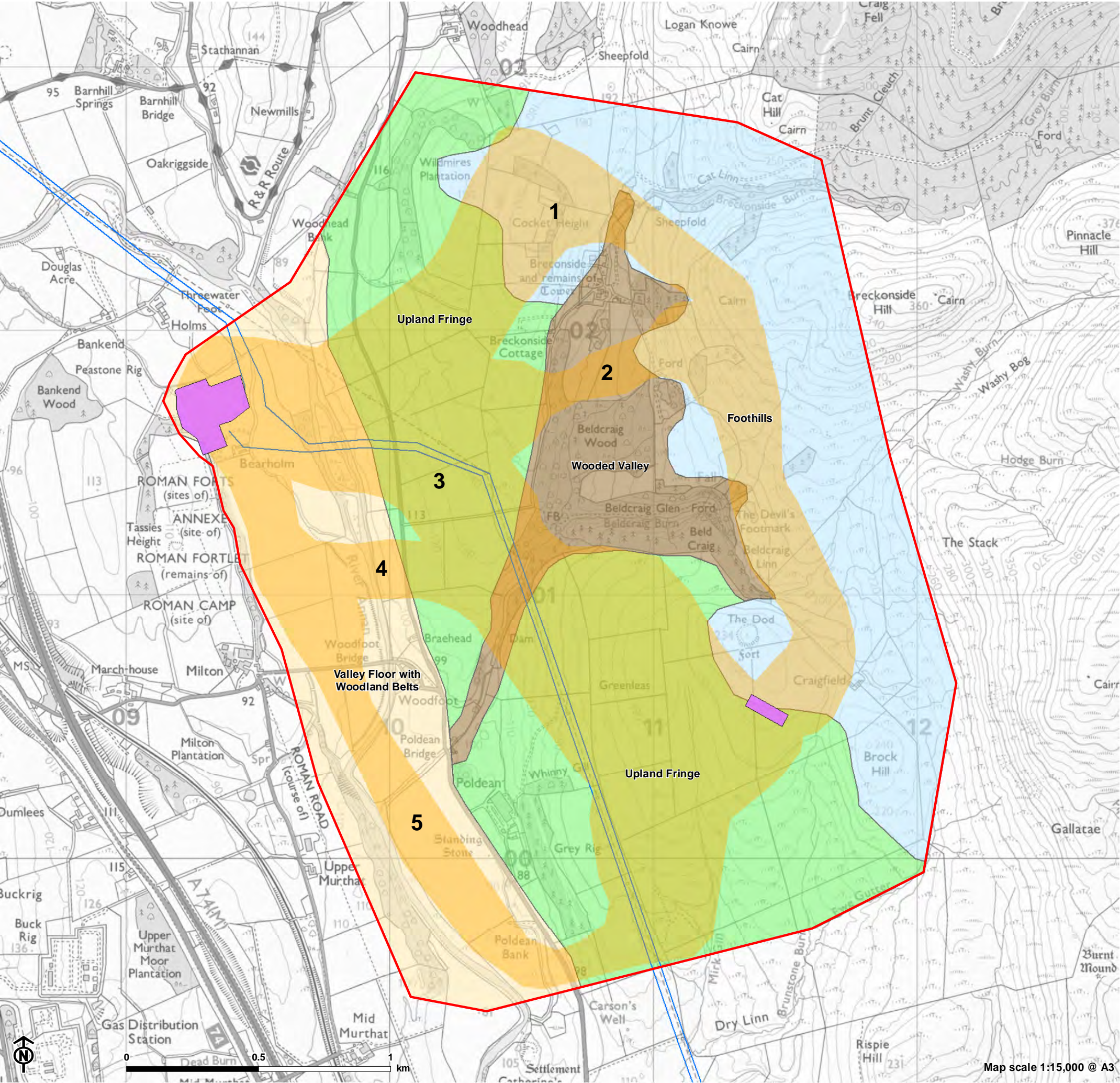
- Moffat Hills Regional Scenic Area (RSA)
- Landscape Character Types (NatureScot 2019)
  - 163. Middle Dale - Dumfries & Galloway
  - 166. Upland Glens - Dumfries & Galloway
  - 172. Upland Fringe - Dumfries & Galloway
  - 175. Foothills - Dumfries & Galloway
  - 177. Southern Uplands - Dumfries & Galloway
  - 178. Southern Uplands with Forest - Dumfries & Galloway

#### Landscape and Visual Receptors

- National Cycle Route (NCN 74)
- Core Paths
- Romans and Reivers Route
- Southern Upland Way
- Residential property
- Residential property - 150m buffer



Figure 5.1b: Local Landscape Character Types



- Study area
- Substation
- Existing 400kV Overhead Line (OHL)
- Route Options

Local Landscape Character Types

- Foothills
- Upland Fringe
- Valley Floor with Woodland Belts
- Wooded Valley





Figure 5.1c: Local Landscape Character Types and Sensitivity to OHL

- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Options

- Local Landscape Character Types and Sensitivity to OHL
- High
  - Medium-high
  - Medium-low

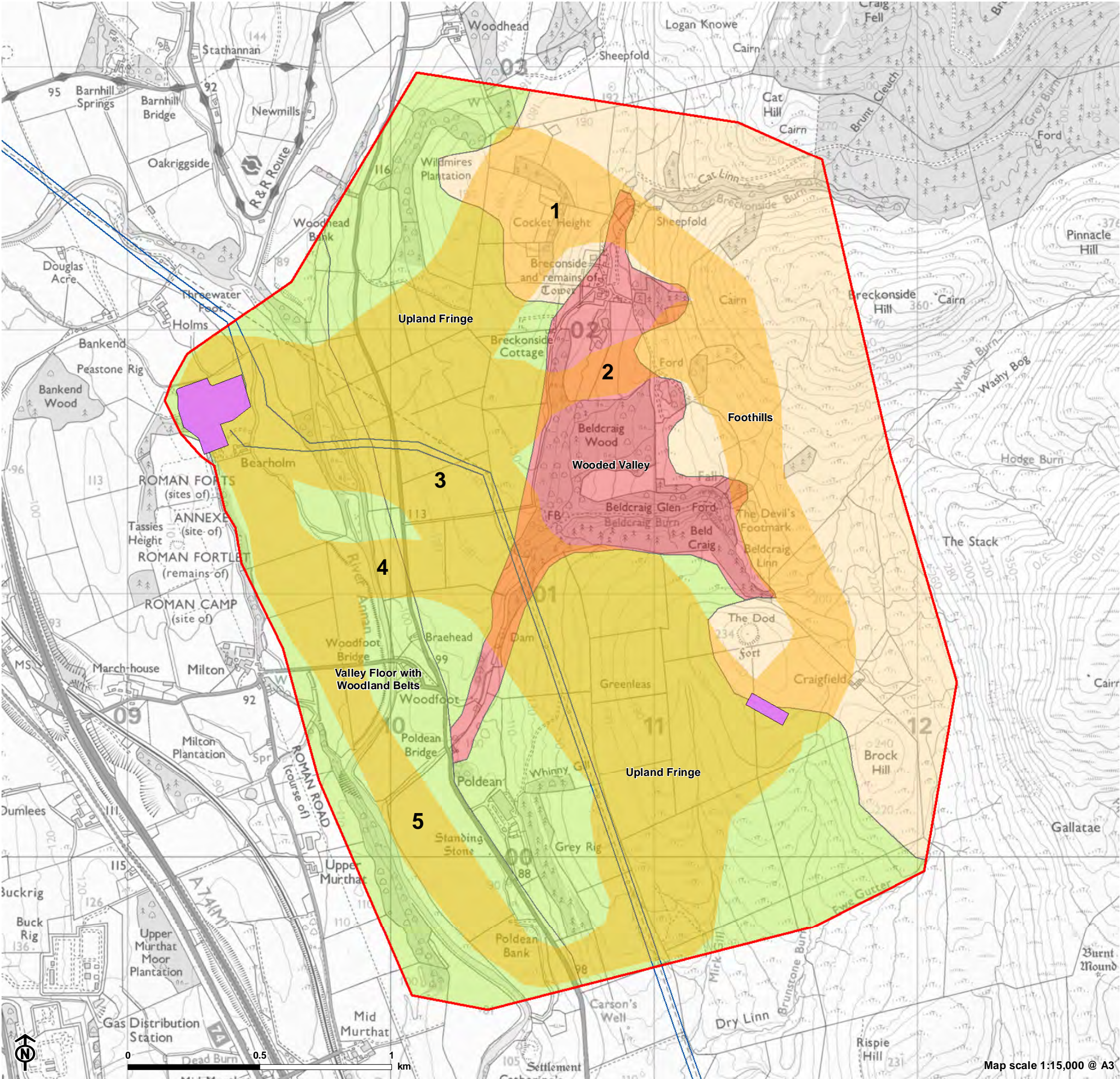
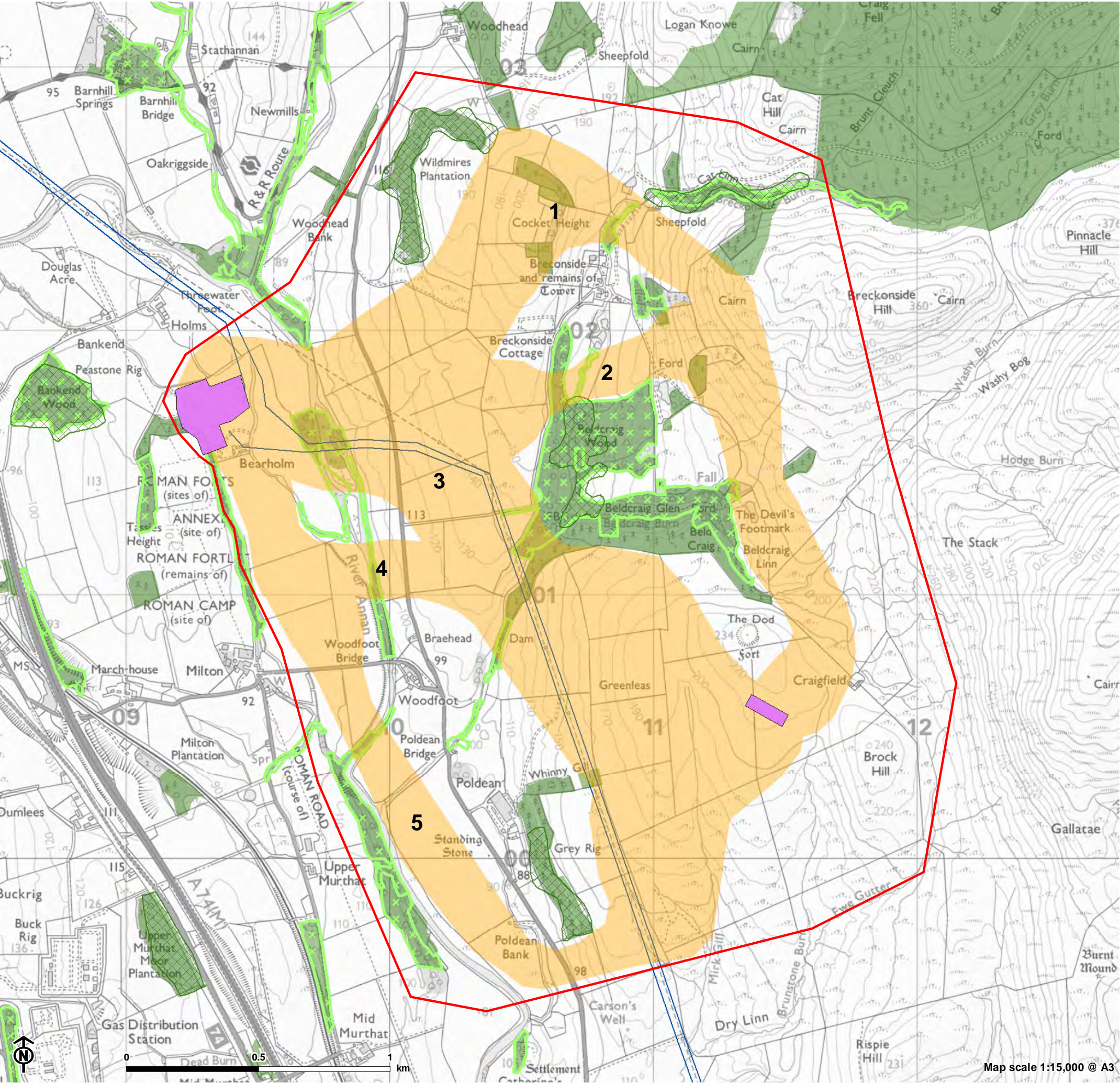






Figure 5.2: Forestry and Woodland

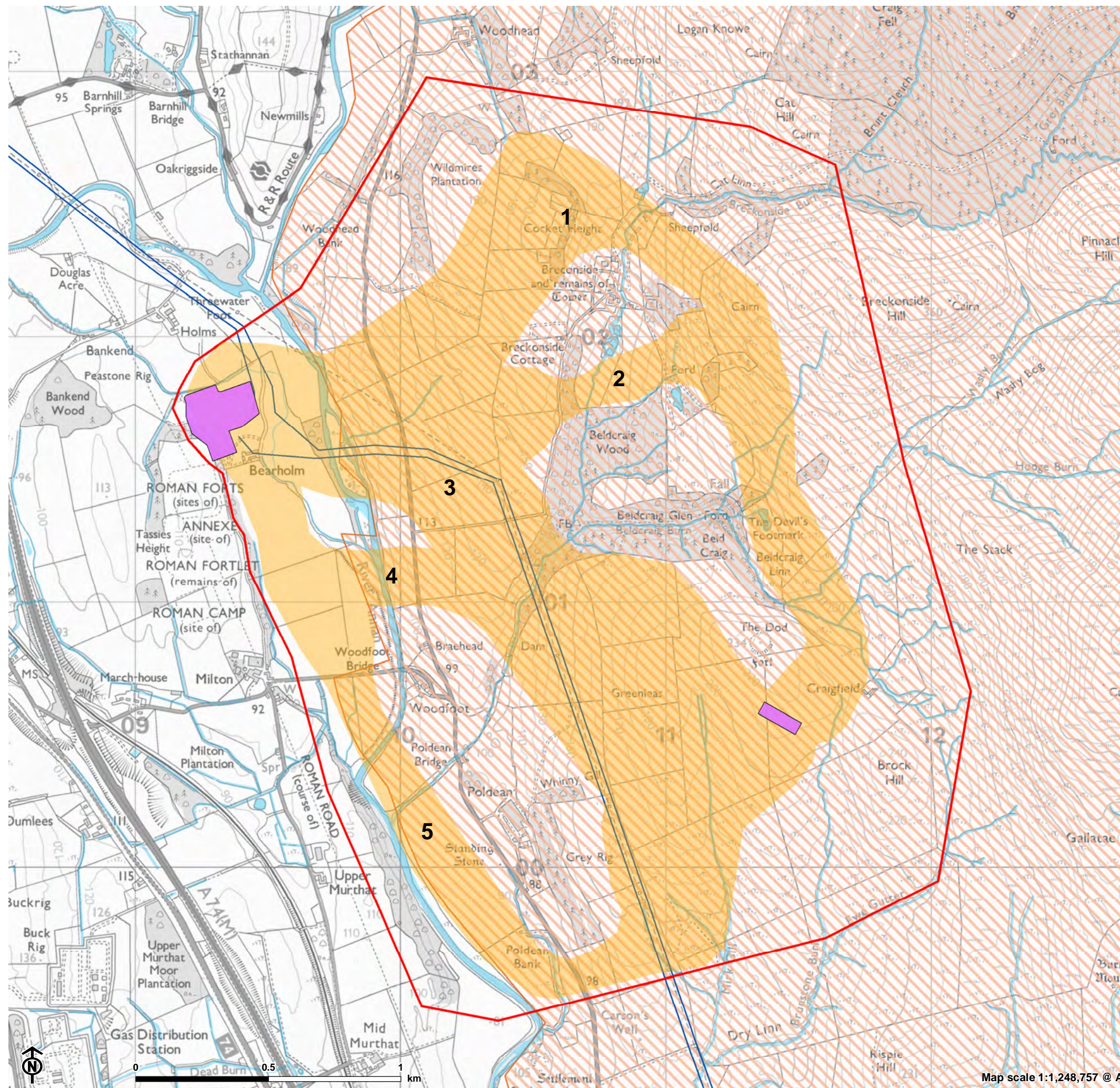


- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Options

- Forestry**
- Ancient Woodland Inventory (AWI)
  - Native Woodland (NWSS)
  - National Forestry Inventory (NFI)



Figure 5.3: Biodiversity, Geological Resources including Watercourses



- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Options

**Biodiversity and Geological Resources**

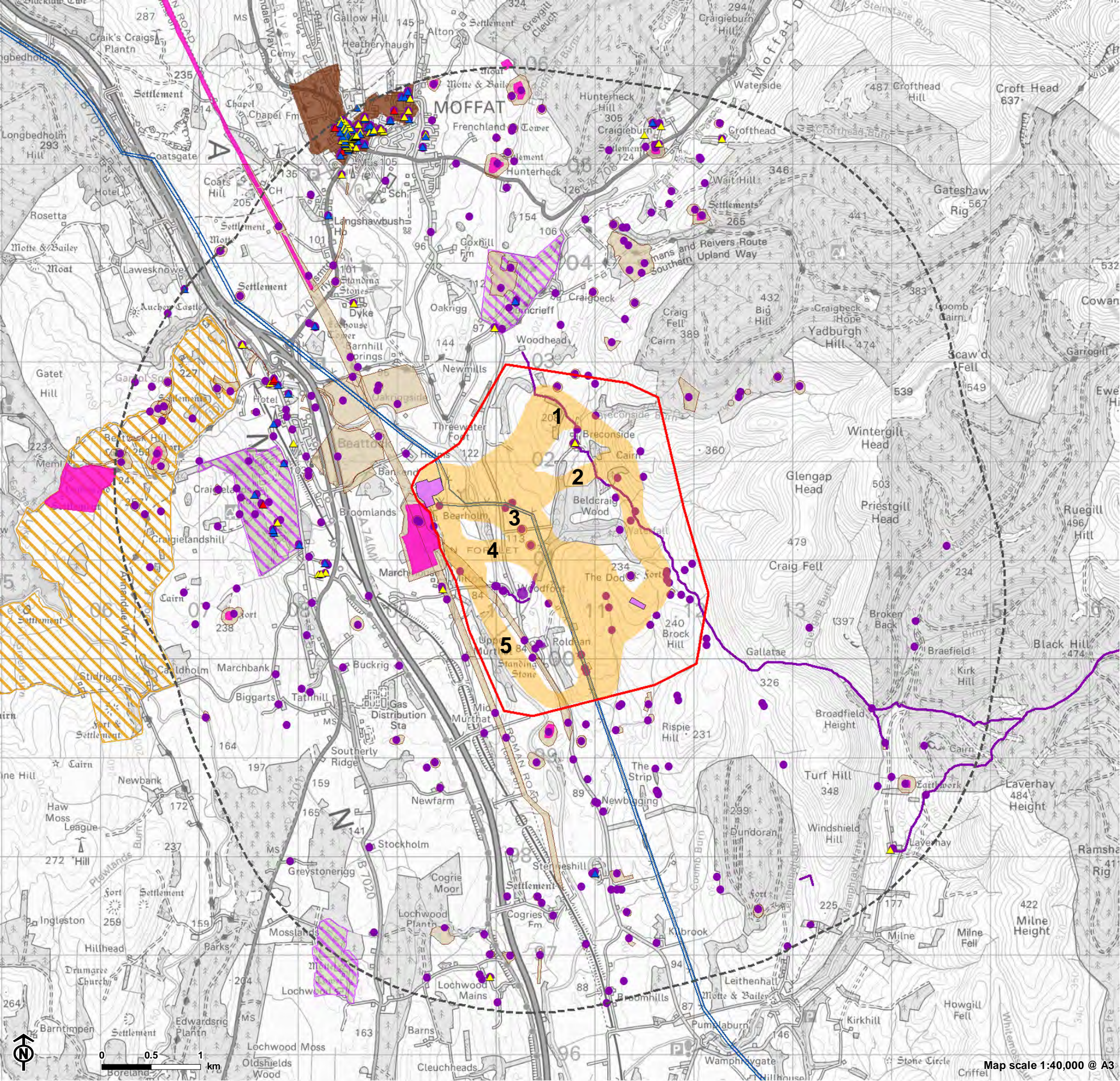
- Central Southern Uplands Environmentally Sensitive Area (ESA)
- Watercourse

**Note:** For data licencing reasons, the SEPA 1:200 year flood risk zones are not shown on Figure 5.3, however these can be viewed at the following link:

<https://www.sepa.org.uk/environment/water/flooding/flood-maps/>



Figure 5.4: Cultural Heritage



- Study area
- Substation
- Existing 400kV overhead line (OHL)
- 3km from study area
- Route Options

Designated Heritage Assets

- Listed Building - Category A
- Listed Building - Category B
- Listed Building - Category C
- Scheduled Monument (SM)
- Conservation Area - Moffat

Non-designated heritage assets of local and regional significance

- Historic Environment Record
- Areas of Archaeological Interest
- Areas of Archaeological Sensitivity
- Non-Inventory Gardens and Designed Landscapes



## Chapter 6

### Appraisal Findings

**6.1** The emerging preferred route for the twin 132kV OHLs, i.e. the preference taking account of environmental considerations only, is Route Option 3. Route Option 3 is the shortest route and also has the best potential relative to other options to minimise visual effects on residential receptors and the wider landscape. The route avoids the highest ground to the east and north of the study area (limiting visual effects in views from Annandale) and also avoids the Moffat Hills RSA.

**6.2** Route Option 3 also requires the least number of watercourse crossings, minimises cultural heritage setting change, does not parallel the River Annan 1:200 year floodplain for any considerable distance and avoids areas of native woodland.

**6.3** The detailed appraisal findings are included in **Appendix B**.

### Technical Review of Emerging Preferred Route Option

**6.4** Following the environmental appraisal of route options (see **Appendix B**), all route options were reviewed by SPEN in relation to the system/network design requirements to identify the preferred route taking account of technical considerations only. This review was undertaken to ensure that, based on the level of detail available, the preferred technical route is within the technical parameters required to construct the OHL.

**6.5** SPEN confirmed early in the technical review process that Route Options 4 and 5 were not considered to be technically feasible or economically viable as they would need to cross the existing 400kV OHL several times (and would therefore need to go underground at this crossing point with terminal structures). This technical constraint would result in higher costs to construct the project, meaning that these routes would not fulfil the Routing Objective. Route Options 4 and 5 were therefore not considered further in the confirmation of the preferred route.

**6.6** The technical review of the remaining Route Options 1-3 included the consideration of the following parameters:

- Altitude;
- Topography (particularly slopes greater than 22 degrees however, slopes that were not greater than 22 degrees but steep in nature were also considered as these could be less favourable for routeing);
- Buildability access constraints (including restrictive roads and forestry access tracks);
- Crossings of existing OHL transmission and distribution infrastructure (including the existing 400kV OHL);
- Proximity to existing OHL transmission and distribution infrastructure;
- Mineworking areas (Opencast etc);
- Ground conditions (including peat);
- Public service utilities (crossings/ proximity) (including major pipelines);
- Watercourse / Catchment areas crossings (i.e. River, Loch, Reservoir);
- Road / railway crossings along corridor;
- Windfarms (existing and future developments);
- Residential / Industrial areas;
- Pollution (consideration of corrosion rates); and
- Forestry.

**6.7** To inform the technical review, a specific risk rating (high, medium, or low) was allocated to each parameter by SPEN's technical team for Route Options 1-3. Parameters with low risk ratings for all Route Options were not considered in the appraisal. The appraisal therefore considered the following technical criteria:

- Altitude and topography (including slopes);
- Crossing of/ proximity to existing OHLs;
- Buildability/access constraints;
- Watercourse / catchment areas crossings
- Crossing of public service utilities, and residential/industrial areas; and
- Forestry.

**6.8** When taking this technical criteria into consideration, Route Option 3 was also considered to be the preferred route, particularly in relation to altitude and topography which would present less of a constraint for construction.

**6.9** On this basis, the technical and environmental review confirmed that the emerging preferred Route Option 3

could be progressed to the cumulative appraisal, as outlined below.

## Consideration of Cumulative Effects of Emerging Route Option Preferences

**6.10** As set out in **Chapter 3**, the routeing process takes cognisance of other OHL connections which share the project study area. When considering more than one project, combined (or cumulative) effects can arise from the concentration of effects in one area or the distribution of effects across a wider area. It is therefore necessary to find an appropriate balance using professional judgement and experience.

**6.11** Across the study area the existing 400kV Scotland – England Interconnector OHL extends from the north-west to south-east. The other existing connections considered in the cumulative appraisal comprise the existing 33kV underground cable located in the north of the study area. As this is underground, it is unlikely to result in operational cumulative interactions of note and is therefore not considered further.

**6.12** Following technical confirmation of the emerging route preference, an environmental review has been undertaken to consider the existing 400kV OHL in combination with the emerging preferred Route Option 3.

**6.13** The environmental review found that the emerging preferred route runs broadly parallel to the existing 400kV as it drops down the valley side to the east of Annadale River and passing over a minor road, crossing the River Annan and passing through low lying farmland before linking into the eastern side of Moffat substation. Cumulative interactions between OHL are difficult to avoid on the approach to substations, and running routes broadly parallel in areas where OHL have to converge can help to limit wider cumulative effects in the local area.

**6.14** Overall, there will be no likely significant cumulative effects which will prevent Route Option 3 from being progressed further. Cumulative effects will, however, continue to be considered, and assessed where appropriate, throughout the detailed alignment and Environmental Appraisal stage.

## Conclusion

**6.15** In accordance with the overarching project routeing objective and routeing strategy, the selection of the preferred route has primarily reflected the findings of the landscape and visual appraisal. This is on the basis that the routeing stage comprises the most effective way of avoiding and/or minimising potential landscape and visual effects, whereas effects on other environmental



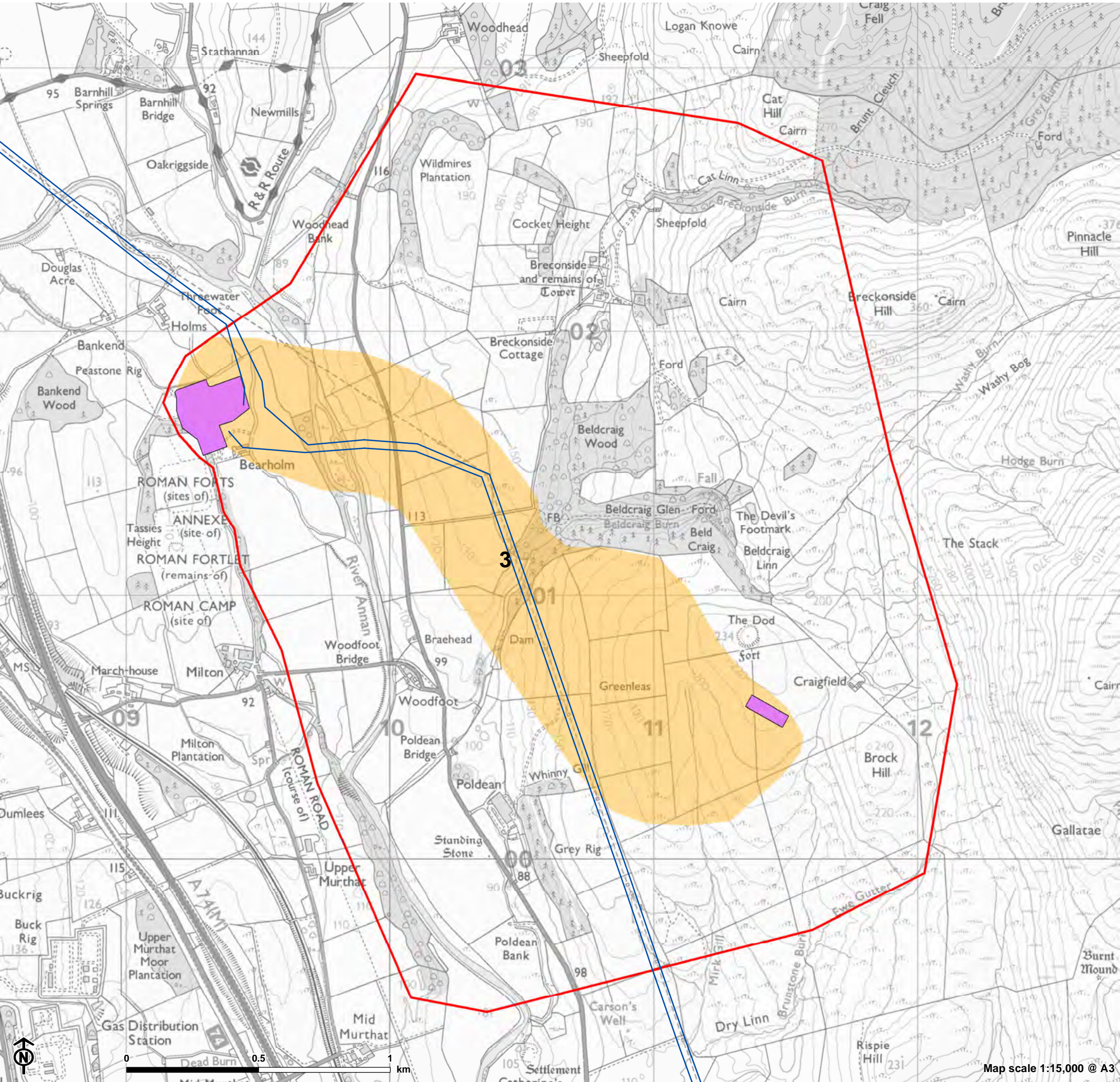
characteristics such as cultural heritage can be more readily minimised during the route alignment stage (and potentially through adoption of mitigation measures).

**6.16** On this basis, the environmental and technical appraisal undertaken as part of the routeing process has identified a continuous 132kV OHL route which meets the project routeing objective. The preferred route is confirmed as **Route Option 3** and is shown in **Figure 6.1**. The preferred route, along with the alternative route options considered, form the basis of this round of consultation with stakeholders and the public. Further details in relation to the consultation process are provided in **Chapter 7**.





Figure 6.1: Preferred Route Option 3



- Study area
- Substation
- Existing 400kV overhead line (OHL)
- Route Option 3



## Chapter 7

# Consultation Process and Next Steps

### The Consultation Process

**7.1** As set out in **Chapter 1**, SPEN will apply to the Scottish Ministers for consent to install and keep installed new twin 132kV OHLs from the proposed Scoop Hill Community Wind Farm substation to two new 132kV switchbays at Moffat substation under Section 37 of the Electricity Act 1989. SPEN will also apply for deemed planning permission for the line and associated works under Section 57(2) of the Town and Country Planning (Scotland) Act 1997. While there are no formal pre-application requirements for consultation in seeking section 37 consent/deemed planning permission, SPEN is embracing best practice as outlined in the *Scottish Government Energy Consents Unit's Best Practice Guidance (January 2013)*. This guidance encourages applicants to engage with stakeholders and the public in order to develop their proposals in advance of such applications being made.

**7.2** Therefore, prior to the submission, SPEN is carrying out consultation with stakeholders and the public.

**7.3** Following the submission of application for Section 37 consent and deemed planning permission, the Scottish Government ECU will, on behalf of Scottish Ministers, carry out further consultation with the public and stakeholders, including Dumfries and Galloway Council, before making a decision on whether to grant consent.

### Consultation Strategy

**7.4** SPEN attaches great importance to the effect that its works may have on the environment and local communities and is very keen to hear the views of local people to help it develop the Scoop Hill 132kV Connection Project in the best way.

**7.5** The overall objective of the consultation process is to ensure that all parties with an interest in the Scoop Hill 132kV Connection Project continue to have access to up to date information, and are given clear and easy ways in which to shape and inform SPEN's proposals at the pre-application stage.



**7.6** In addition, it is envisaged that the key issues identified through this process can be recorded and presented to decision makers to assist the consents process.

**7.7** As part of the consultation strategy, SPEN will be holding a virtual exhibition for the public, stakeholders and consultees. Given the current social distancing restrictions due to the Covid-19 pandemic, it has not been possible to hold in-person public exhibitions and this position is endorsed by the Scottish Government under emergency legislation. Further details of the proposed virtual exhibition are provided below.

### Consultation Launch and Duration

**7.8** The consultation will run for four weeks and the information will be available from **Monday 25<sup>th</sup> October 2021 to Sunday 21<sup>st</sup> November 2021**.

**7.9** Prior to the consultation, adverts will appear in The Moffat News and the Dumfries and Galloway Standard (both local weekly newspapers) for two weeks on **Thursday 14<sup>th</sup> and 21<sup>st</sup> October 2021**, and **Friday 15<sup>th</sup> and 22<sup>nd</sup> October 2021** respectively. The adverts provide information on the project, where and when the consultation will take place and confirms that comments received at this stage are informal comments to SPEN, with the opportunity to comment formally to the ECU available once an application has been submitted to them. A copy of the advertisement text, as publicised in the local newspapers, is provided in **Appendix D**.

**7.10** Leaflets have also been distributed to all properties which are located within the study area, and posters have been placed in key locations in and around Moffat and Beattock. Copies of the leaflet and poster can be found in **Appendices E and F**.

**7.11** The closing date for sending responses to SPEN will be **midnight on Sunday 28<sup>th</sup> November 2021**. Following this date, the information will remain accessible online (on the project website) and available to download (from the project website and the online virtual exhibition).

### Consultees

**7.12** SPEN wishes to consult with relevant stakeholders and gain their views on the proposed route of the Scoop Hill 132kV Connection Project. The consultation will seek to gain views from the following broad groups:

- statutory and non-statutory consultees, including community councils;

- known local interest and community groups operating in Dumfries and Galloway, South Lanarkshire and Scottish Border Council areas;
- elected members of Dumfries and Galloway Council area, the Member of Parliament (MP) and Members of the Scottish Parliament (MSPs) whose constituencies are within in the Dumfries and Galloway Council area; and
- local residents, businesses and the public in general.

**7.13** As noted above, leaflets have been distributed to local residents within the study area. Emails have also been sent to all statutory consultees and the relevant community councils advising them of the consultation and seeking their views on the proposals. The list of stakeholders consulted can be found in **Appendix G**.

### The Focus of the Consultation

**7.14** This report presents the findings of Phase One of the Scoop Hill 132kV Connection Project, the routing process, resulting in the identification of a preferred route.

**7.15** The focus of the consultation will be to ask for people's views on:

- the preferred route;
- the alternative route options considered during the routing process;
- any other issues, suggestions or feedback; particularly views on the local area, for example areas used for recreation, local environmental features, and any plans to build along the preferred route.

### Sources of Information about the Consultation

**7.16** The principal source of information regarding the consultation will comprise the Scoop Hill 132kV Connection Project website and the online virtual exhibition.

#### Project Website

**7.17** The project website will contain publicly available consultation documents for viewing or download: [https://www.spenergynetworks.co.uk/pages/community\\_consultation.aspx](https://www.spenergynetworks.co.uk/pages/community_consultation.aspx).

#### Online Virtual Exhibition

**7.18** SPEN will hold a virtual public exhibition from **Monday 25<sup>th</sup> October 2021 – Sunday 21<sup>st</sup> November 2021** as an alternative to face-to-face consultation. Although public consultation for projects under the Electricity Act 1989 is not a statutory requirement, the

proposals remain in line with recent Scottish Government Guidance<sup>10</sup> on what alternative consultation efforts can be taken in light of the Covid-19 pandemic for other non-Electricity Act proposals.

**7.19** The online exhibition will include a series of information boards outlining details of the Scoop Hill 132kV Connection Project. The information on the Scoop Hill 132kV Connection Project will also be available to download as a pdf.

**7.20** The virtual exhibition will be accessible at:  
[www.scoophillohl.co.uk](http://www.scoophillohl.co.uk).

### How to Submit a Comment or Discuss the Project

**7.21** People will be able to submit comments:

- at the virtual exhibition via the online questionnaire and live messenger chat;
- by email;
- in writing; or
- by phone.

### At the Virtual Exhibition

**7.22** Visitors to the online exhibition will have the opportunity to provide feedback by completing an online questionnaire. The closing date for sending responses will be **midnight on Sunday 28<sup>th</sup> November 2021**. Following this date, the information will remain accessible online and available to download.

**7.23** We will also be on hand to answer any questions you may have via the live chat service on the virtual exhibition room on the following dates:

- **Monday 25<sup>th</sup> October from 2pm - 4pm**
- **Tuesday 26<sup>th</sup> October from 10am - 12pm**
- **Wednesday 27<sup>th</sup> October from 5pm – 7pm.**

### Email

**7.24** SPEN will also accept comments relating to the specific focus of this round of consultation by email to [scoophillconnectionproject@spenergynetworks.co.uk](mailto:scoophillconnectionproject@spenergynetworks.co.uk), no later than **midnight on Sunday 28<sup>th</sup> November 2021**.

### Write to Us

Scoop Hill 132kV Connection Project  
Land and Planning Team  
SP Energy Networks

55 Fullarton Drive  
Glasgow  
G32 8FA

**7.25** The closing date for receiving written responses will be **midnight on Sunday 28<sup>th</sup> November 2021**.

**7.26** If contacting SPEN by post, people are advised to allow up to 7 days for these to be received. It may not be possible to consider comments received after this date.

### By Phone

**7.27** You can call the Community Liaison Team during the consultation period on 07516461129.

## Next Steps: Route Alignment and Environmental Appraisal

**7.28** The responses received from the consultation process will be considered in combination with the findings of this report to enable SPEN to decide on the 'proposed' route to be progressed to the next stage.

**7.29** Following confirmation of the proposed route, a request for an Environmental Impact Assessment (EIA) Screening Opinion will be submitted to the Scottish Ministers. Should the Scottish Ministers determine that the Scoop Hill 132kV Connection Project is not EIA development i.e. it is not likely to give rise to significant environmental effects, then an Environmental Appraisal will be undertaken in line with Scottish Government guidance and submitted with the Section 37 application for consent. If the project is deemed to be EIA development, then an EIA will be undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 to identify and present the likely significant environmental effects of the proposal, and the measures proposed to mitigate these effects. The EIA will be presented in an EIA Report and submitted in support of the Section 37 application for consent.

**7.30** Following EIA Screening, SPEN will proceed to identify an alignment for the twin 132kV OHL, including individual pole positioning. This will be informed by the Environmental Appraisal/EIA surveys, detailed engineering ground surveys and discussions with landowners. This alignment, including all ancillary development, will be included in the application for Section 37 Consent and deemed planning permission.

<sup>10</sup> Scottish Government, 2020, 'Covid 19 Emergency and Pre-Application Consultation and Requirements for a Public Event', Available [online] at:

<https://www.gov.scot/publications/coronavirus-covid-19-planning-guidance-on-pre-application-consultations-for-public-events/>

**7.31** SPEN will consult fully with affected landowners and occupiers on all aspects of the Scoop Hill 132kV Connection Project and will give them an opportunity to comment on proposals as they progress.



## **Appendix A**

### **The Holford Rules and SHETL Clarification Note**

## The Holford Rules: Guidelines for the Routeing of New High Voltage Overhead Transmission Lines (with NGC 1992 and SHETL 2003 Notes)

### Rule 1

**Avoid altogether, if possible, the major areas of highest amenity, by so planning the general route of the line in the first place, even if the total mileage is somewhat increased in consequence.**

#### Note on Rule 1

- a. Investigate the possibility of alternative routes, avoiding altogether, if possible major areas of highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements. If there is an existing transmission line through a major area of highest amenity value and the surrounding land use has to some extent adjusted to its presence, particularly in the case of commercial forestry, then effect of remaining on this route must be considered in terms of the effect of a new route avoiding the area.
- b. Areas of highest amenity value require to be established on a project-by-project basis considering Schedule 9 to The Electricity Act 1989, Scottish Planning Policies, National Planning Policy Guidelines<sup>11</sup>, Circulars and Planning Advice Notes and the spatial extent of areas identified.

#### **Examples of areas of highest amenity value which should be considered are:**

*Special Area of Conservation (NPPG 14)<sup>12</sup>*

*Special Protection Area (NPPG 14)<sup>13</sup>*

*Ramsar Site (NPPG 14)<sup>14</sup>*

*National Scenic Areas (NPPG 14)<sup>15</sup>*

*National Parks (NPPG 14)<sup>16</sup>*

*National Nature Reserves (NPPG 14)<sup>17</sup>*

*Protected Coastal Zone Designations (NPPG 13)<sup>18</sup>*

*Sites of Special Scientific Interest (SSSI) (NPPG 14)<sup>19</sup>*

*Schedule of Ancient Monuments (NPPG 5)<sup>20</sup>*

*Listed Buildings (NPPG 18)<sup>21</sup>*

*Conservation Areas (NPPG 18)<sup>22</sup>*

*World Heritage Sites (a non-statutory designation) (NPPG 18)<sup>23</sup>*

*Historic Gardens and Designed Landscapes (a non-statutory designation) (NPPG 18)<sup>24</sup>*

<sup>11</sup> The National Planning Policy Guidelines ("NPPG") have been superseded by the Scottish Planning Policy ("SPP") published on 23 June 2014. The references to the relevant equivalent paragraphs of the SPP are noted.

<sup>12</sup> Now noted in SPP paragraph 207.

<sup>13</sup> Now noted in SPP paragraph 207.

<sup>14</sup> Now noted in SPP paragraph 211.

<sup>15</sup> Now noted in SPP paragraph 212.

<sup>16</sup> Now noted in SPP paragraph 212.

<sup>17</sup> Now noted in SPP paragraph 212.

<sup>18</sup> Now noted in SPP paragraph 87.

<sup>19</sup> Now noted in SPP paragraphs 211-212.

<sup>20</sup> Now noted in SPP paragraph 145.

<sup>21</sup> Now noted in SPP paragraph 141.

<sup>22</sup> Now noted in SPP paragraph 143.

<sup>23</sup> Now noted in SPP paragraph 147.

<sup>24</sup> Now noted in SPP paragraph 148.



## Rule 2

**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.**

### Note on Rule 2

- a. *Small areas of highest amenity value not included in Rule 1 as a result of their spatial extent should be identified along with other areas of regional or local high amenity value identified from development plans.*
- b. *Impacts on the setting of historic buildings and other cultural heritage features should be minimised.*
- c. *If there is an existing transmission line through an area of high amenity value and the surrounding landuses have to some extent adjusted to its presence, particularly in the case of commercial forestry, then the effect of remaining on this line must be considered in terms of the effect of a new route deviating around the area.*

## Rule 3

**Other things being equal, choose the most direct line, with no sharp changes of direction and thus with few angle towers.**

### Note on Rule 3

- a. *Where possible choose inconspicuous locations for angle towers, terminal towers and sealing end compounds.*
- b. *Too few angles on flat landscape can also lead to visual intrusion through very long straight lines of towers, particularly when seen nearly along the line.*

## Rule 4

**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.**

## Rule 5

**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.**

### Notes on Rules 4 and 5

- a. *Utilise background and foreground features to reduce the apparent height and domination of towers from main viewpoints.*
- b. *Minimise the exposure of numbers of towers on prominent ridges and skylines.*
- c. *Where possible follow open space and run alongside, not through woodland or commercial forestry, and consider opportunities for skirting edges of copses and woods. Where there is no reasonable alternative to cutting through woodland or commercial forestry, the Forestry Commission Guidelines should be followed (Forest Landscape Design Guidelines, second edition, The Forestry Commission 1994 and Forest Design Planning – A Guide to Good Practice, Simon Bell/The Forest Authority 1998).*

- d. Protect existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape.

#### Rule 6

**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 concatenation or 'wirescape'.**

#### Note on Rule 6

- a. In all locations minimise confusing appearance.
- b. Arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance. Where routes need to diverge allow, where practicable, sufficient separation to limit the impacts on properties and features between lines.

#### Rule 7

**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.**

#### Note on Rule 7

- a. When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development.
- b. Alignments should be chosen after consideration of impacts on the amenity of existing development and on proposals for new development.
- c. When siting substations take account of the impacts of the terminal towers and line connections that will need to be made and take advantage of screening features such as ground form and vegetation.

#### Explanatory Note on Rule 7

*The assumption made in Rule 7 is that the highest voltage line is overhead.*

### Supplementary Notes

#### d. Residential Areas

Avoid routeing close to residential areas as far as possible on grounds of general amenity.

#### e. Designations of Regional and Local Importance

Where possible choose routes which cause the least disturbance to Areas of Great Landscape Value and other similar designations of Regional or Local Importance.

#### f. Alternative Lattice Steel Tower Designs

In addition to adopting appropriate routeing, evaluate where appropriate the use of alternative lattice steel tower designs available where these would be advantageous visually, and where the extra cost can be justified. [Note: SHETL have reviewed the visual and landscape arguments for the use of lattice steel towers in Scotland and summarised these in a document entitled *Overhead Transmission Line Tower Study 2004*].

## FURTHER NOTES ON CLARIFICATION TO THE HOLFORD RULES

### Line Routeing and People

The Holford Rules focused on landscape amenity issues for the most part. However, line routeing practice has given greater importance to people, residential areas etc.

The following notes are intended to reflect this.

- a. Avoid routeing close to residential areas as far as possible on grounds of general amenity.
- b. In rural areas avoid as far as possible dominating isolated house, farms or other small-scale settlements.
- c. Minimise the visual effect perceived by users of roads, and public rights of way, paying particular attention to the effects of recreational, tourist and other well used routes.

### Supplementary Notes on the Siting of Substations

- a. Respect areas of high amenity value (see Rule 1) and take advantage of the containment of natural features such as woodland, fitting in with the landscape character of the area.
- b. Take advantage of ground form with the appropriate use of site layout and levels to avoid intrusion into surrounding areas.
- c. Use space effectively to limit the area required for development, minimizing the impacts on existing land use and rights of way.
- d. Alternative designs of substation may also be considered, e.g. 'enclosed', rather than 'open', where additional cost can be justified.
- e. Consider the relationship of tower and substation structures with background and foreground features, to reduce the prominence of structures from main viewpoints.
- f. When siting substations take account of the impacts of line connections that will need to be made.

## INTERPRETATION OF THE HOLFORD RULES 1 AND 2 AND THE NOTES TO RULE 2 REGARDING THE SETTING OF A SCHEDULED ANCIENT MONUMENT OR A LISTED BUILDING

### 1. Interpretation of The Holford Rules 1 and 2

#### 1.1. Introduction

Rules 1 refers to avoiding major areas of highest amenity value, Rule 2 refers to avoiding smaller areas of high amenity value. These rules therefore require identification of areas of amenity value in terms of highest and high, implying a hierarchy, and the extent of their size(s) or area(s) in terms of major and smaller areas.

The NGC Notes to these Rules identify at Rule 1(b) areas of highest amenity value and at Rule 2(a) and (b) of high amenity value that existed in England circa 1992.

#### 1.2. Designations

Since 1949 a framework of statutory measures has been developed to safeguard areas of high landscape value and nature conservation interest. In addition to national designations, European Community Directives on nature conservation, most notably through Special Areas of Conservation under the Habitats and Species Directive (92/43/EC) and Special Protection Areas under the Conservation of Wild Birds Directive (79/409/EEC) have been implemented. Governments have also designated a number of Ramsar sites under the Ramsar Convention on wetlands of International Importance (CM6464). Scottish Office circulars 13/1991 and 6/1995 are relevant sources of information and guidance. In addition, a wide range of non-statutory landscape and nature conservation designations affect Scotland.



### 1.3. Amenity

The term 'Amenity' is not defined in The Holford Rules but has generally been interpreted as designated areas of scenic, landscape, nature conservation, scientific, architectural or historical interest.

This interpretation is supported by paragraph 3 of the Schedule 9 to the electricity Act 1989 (The Act). Paragraph 3 (1)(a) requires that in formulating any relevant proposals the licence holder must have regard to the desirability of preserving natural beauty, or conserving flora, fauna and geological or physiological features of special interest and of protecting sites, buildings, including structures and objects of architectural, historic or archaeological interest. Paragraph 3 (1)(b) requires the license holder to do what he reasonably can do to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any flora, fauna, features, sites, buildings or objects.

### 1.4. Hierarchy of Amenity Value

Rules 1 and 2 imply a hierarchy of amenity value from highest to high.

Schedule 9 to the Act gives no indication of hierarchy of value and there is no suggestion of a hierarchy of value in either NPPG5: Archaeology and Planning, NPPG 13: Coastal Planning, NPPG 14: Natural Heritage or NPPG 18: Planning and the Historic Environment. Nevertheless, designations give an indication of the level of importance of the interest to be safeguarded.

### 1.5. Major and Smaller Areas

Rules 1 and 2 imply consideration of the spatial extent of the area of amenity in the application of Rules 1 and 2.

### 1.6. Conclusion

Given that both the spatial extent in terms of major and smaller and the amenity value in terms of highest and high that must be considered in applying Rules 1 and 2, that no value in these terms is provided by either Schedule 9 to the Act, relevant Scottish Planning Policies or National Planning policy Guidelines, then these must be established on a project-by-project basis. Designations can be useful in giving an indication of the level of importance and thus value of the interest safeguarded. The note to The Holford Rules can thus only give examples of the designations which may be considered to be of the highest amenity value.

## 2. The setting a Scheduled Ancient Monument or a Listed Building

The NGC note to Rule 2 refers to the setting of historic buildings and other cultural heritage features. NPPG 5: Archaeology and Planning refers to the setting of scheduled ancient monuments and NPPG 18: Planning and the Historic Environment refers to the setting Listed Buildings. None of these documents define setting.

## ENVIRONMENTAL AND PLANNING DESIGNATIONS – EXAMPLES OF DESIGNATIONS TO BE TAKEN INTO ACCOUNT IN THE ROUTING OF NEW HIGH VOLTAGE TRANSMISSION LINES

### Major Areas of Highest Amenity Value

2. In Scotland relevant national or international designations for major areas of highest amenity value include the following identified from Scottish Planning Policies and National Policy Guidelines<sup>25</sup>:

Special Areas of Conservation	(NPPG 14)
Special Protection Areas	(NPPG 14)
Ramsar Sites	(NPPG 14)
National Scenic Areas	(NPPG 14)
National Parks	(NPPG 14)
National Nature Reserves	(NPPG 14)
Protected Coastal Zone Designations	(NPPG 13)
Sites of Special Scientific Interest	(NPPG 14)
Scheduled Ancient Monuments	(NPPG 5)
Listed Buildings	(NPPG 18)
Conservation Areas	(NPPG 18)
World Heritage Sites	(NPPG 18)
Historic Gardens and Designated Landscapes	(NPPG 18)

### Other Smaller Areas of High Amenity Value

3. There are other designations identified in development plans of local planning authorities which include areas of high amenity value:

Areas of Great Landscape Value  
Regional Scenic Areas  
Regional Parks  
Country Parks

The nature of the landscape in these areas is such that some parts may also be sensitive to intrusion by high voltage overhead transmission lines but it is likely that less weight would be given to these areas than to National Scenic Areas and National Parks.

### Flora and Fauna

4. Legislation sets out the procedure for designation of areas relating to flora, fauna and to geographical and physiogeographical features. Designations relevant to the routing of transmission lines will include Special Area of

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<sup>25</sup> See footnotes under Holford Rule 1 (note on Rule 1) for references update.

Conservation, Special Protection Area, Sites of Special Scientific Interest, National Nature Reserves, Ramsar Sites and may also include local designations such as Local Nature Reserve.

#### Area of Historic, Archaeological or Architectural Value

5. Certain designations covering more limited areas are of relevance to the protection of views and the settings of towns, villages, buildings or historic, archaeological or architectural value. These designations include features which may be of exceptional interest. Of particular importance in this connection are:

Schedule of Ancient Monuments

Listed Buildings, especially Grade A and Grade B Conservation Areas

Gardens and Designated Landscapes included in the Inventory of Gardens and Designated Landscapes of Scotland

#### Green Belts

6. Generally the purposes of Green Belts are not directly concerned with the quality of the landscape.



## **Appendix B**

### **Route Options Appraisal Table**

Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
<b>Approximate length of Line Route (km)</b>	N/A	3.85km	3.4km	2.6km	2.32km	3.68km	<b>Route Option 4</b> is preferred as this is the shortest route option.
<b>Biodiversity</b>	Environmentally Sensitive Areas (ESA)	All options pass through the Western Southern Uplands ESA designated for the purpose of conserving, protecting and enhancing environmental features of the area by the maintenance or adoption of agricultural methods. The ESA is unavoidable for all Route Options due to its extent.					There is no preferred Route Option as there is no notable difference between the Route Options in relation to Biodiversity,
<b>Landscape and Visual Amenity</b>	Residential Visual Amenity with '150m trigger for consideration zone'	None of the Route Options are within any 'trigger for consideration zones'.					<b>On balance, Route Option 3 is the preference.</b>  This route option is not within any 'trigger for consideration zones'; avoids the highest ground to the east and north of the study area (limiting the potential for OHL seen on the horizon in views east from Annandale); avoids the Moffat Hills RSA; is largely contained within medium-low sensitivity LLCT; avoids routing to the west of properties with more open principal views towards the Annandale River; and where this route
	Visual Amenity	Route Option 1 crosses largely open high ground to the east and north of the study area. This includes high ground on the western flank of Breckonside Hill and the minor summit of Crocket Height. This increases the potential for an OHL seen on the horizon, in low lying views east from Annandale.	Route Option 2 crosses largely open high ground to the east of the study area. This includes high ground on the western flank of Breckonside Hill. This increases the potential for OHL seen on the horizon, in low lying views east from Annandale. Views of an OHL (and associated woodland removal for wayleave) will also likely be apparent in certain principal views south for property to east of Breckonside.	Route Option 3 routes west of 'The Dod', avoiding highest ground to the east of the study area. Route Option 3 runs parallel to a short section of the existing 400kV OHL as it crosses Beldcraig Burn. This increases the potential for cumulative interactions with this infrastructure including the need for a wider wayleave through forest/ woodland at the watercourse crossing.	Route Option 4 routes west of 'The Dod', avoiding highest ground to the east of the study area. Route Option 4 crosses the existing 400kV OHL to the south of Beldcraig Burn. This increases the potential for cumulative interactions with this infrastructure including the need for a wider/ further wayleave through forest/ woodland at the watercourse crossing.	Route Option 5 routes southwest of 'The Dod', avoiding highest ground to the east of the study area. Route Option 5 crosses the existing 400kV OHL to the south of the study area. This increases the potential for cumulative interactions with this infrastructure. Route Option 5 routes west of Poldean Bridge and Poldean. Both properties have open principal views orientated to the west, towards the River Annan.	



Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
	Landscape Designations	A section of Route Option 1 routes across high ground on the southern extents of the Moffatt Hills Reginal Scenic Area (RSA), to the north of the study area. The RSA cannot be avoided during detailed alignment.	Route Option 2 skirts the southern edge of the Moffatt Hills RSA, to the north of the study area. However, detailed routeing will be able to avoid this.	Route Options 3 to 5 avoid the Moffatt Hills RSA.			option crosses a narrow part of the highest sensitivity LLCT (Wooded Valley), it does so at a similar point to the existing 400kV OHL.
	Landscape Character (refer to <b>Appendix C</b> for further information on Local Landscape Character Types (LLCT))	Route Option 1 passes through the Foothills LLCT, to the east of the study area. This LLCT is of medium-high sensitivity partly due to the limited human influence, complex topography and role this landscape provides in providing a setting in views from Annandale. This route option also crosses a narrow part of the highest sensitivity Wooded Valley LLCT, above (north) of Breconside.	Route Option 2 passes through the Foothills LLCT, to the east of the study area, which is of medium-high susceptibility. This route option also crosses through the highest sensitivity Wooded Valley LLCT, below (south) of Breconside. The intimate scale and complex landcover and topography increase the sensitivity of this LLCT.	Route Options 3 and 4 cross a narrow part of the highest sensitivity Wooded Valley LLCT. These route options cross this LLCT near the point where the existing 400kV OHL (and associated wayleave) cross the LLCT. As such, the sensitivity to OHL in this part of the LLCT is reduced. Other parts of the route options are largely contained within the Upland Fringe and Wooded Valley Floor LLCT, both of which are of medium-low sensitivity to OHL development.		Route Option 5 is contained with the Upland Fringe and Wooded Valley Floor LLCT, both of which are of medium-low sensitivity to OHL development.	
	Tourism and Recreation: OS promoted viewpoints (visual amenity – Sustrans routes, core paths, long distance trails, tourist attractions and recreational areas such as golf courses)	There are no OS promoted viewpoints, Sustrans routes, core paths or long distance trails of note within the study area. Route Option 1 crosses high ground to the north of the study area, which may introduce visibility of OHL from short sections of the Romans and Reivers Route and Southern Upland Way, both long distance trails outwith and north of the study area.  There are also two Rights of Way (RoW). Route Option 3 crosses the northerly RoW (at a similar point to the 400kV) and Route Options 1-4 cross the more southerly RoW.					
Cultural Heritage	Listed Buildings Category A, B and C	There are no listed buildings within any of the Route Options. Within the study area is the category C Breckonside Tower (LB16848). Part of the significance of this asset derives from its functional relationship with the surrounding countryside and deliberate position within the landscape. As such, it is likely be susceptible to setting change, particularly from Route Options 1 and 2.					On the basis of the present evidence, <b>Route Option 3</b> is

Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
		It is not currently anticipated that the setting of the vast majority of listed buildings lying within the 3km study area would be affected in a way that will affect their heritage significance, either from setting not contributing to their significance, intervening topography, or their setting not interacting with the proposed OHL routes.					preferred. It appears most likely to affect the lowest number of heritage assets and potentially result in the least setting change given that it largely follows the route of an existing OHL.  During the detailed design stage, careful consideration will need to be given to the concentration of non-designated burnt mounds located near the Scoop Hill substation.
	Scheduled Monuments	There are no scheduled monuments within Route Options 1 to 3, with Poldean standing stone (SM12697) located within the proposed study area. As a prehistoric ritual or funerary monument, its location was deliberately chosen to allow inter-visibility between contemporary monuments, often visible from great distances, and to take advantage of the topography for route-ways and significant views. It is therefore likely to be highly susceptible to setting change.  There are 17 scheduled monuments within the 3km study area, largely of a prehistoric domestic and defensive nature. They include hill forts, settlements, scooped settlements, a tower house and a Roman road. This also includes Milton Roman fort, fortlet and camps (SM676) which lies slightly within the western edge of the route study area. The position of these monument types was deliberate, taking advantage of the natural topography to provide defence and widespread views with possible strategic/ power relationships between monuments within the surrounding landscape. Therefore they are likely to be susceptible to setting change.			There are no scheduled monuments within Route Options 4 and 5, with Poldean standing stone (SM12697) located within the proposed study area.  There are 17 additional scheduled monuments within the 3km study area, largely of a prehistoric domestic and defensive nature. They include hill forts, settlements, scooped settlements, a tower house and a Roman road. This also includes Milton Roman fort, fortlet and camps (SM676) which lies slightly within the western edge of the route study area. The position of these monument types was deliberate, taking advantage of the natural topography to provide defence and widespread views with possible strategic/ power relationships between monuments within the surrounding landscape. Therefore they are likely to be susceptible to setting change.  For Route Options 4 and 5, those monuments lying on the valley floor are likely to have particularly high sensitivity to setting change due to the proposed OHL routes locations. This is most evident for Milton Roman fort, fortlet and camps (SM676) and the Coatshell Quarry to Holehouse Linn, Roman Road. Roman military monuments were deliberately placed within the landscape, with widespread views and functional relationships/connections to the network of other military installations in the area (i.e. to facilitate visual signalling via flags and beacons)..They functioned as a way of controlling movements alongside as a key line of communication. Route Options 4 and 5 will likely appear in key outward views along the length of the road alongside towards and from the fort.  In addition, Poldean standing stone's location, as a prehistoric ritual or funerary monument, was likely to have been deliberately chosen to allow inter-		



Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
						visibility between contemporary monuments, often visible from great distances, and to take advantage of the topography for route-ways and significant views. Its position on a major routeway on the valley floor contributes to its significance, with the monument highly susceptible to further setting change as a result of the Route Options 4 and 5 likely interrupting sightlines along the valley.	
	Conservation Areas	There are no Conservation Areas within the route options but one, Moffat, falls within the 3km study area. This lies on the river plane with views outwards from vantage points in the conservation area to the hills in the north, east and west forming an important part of its character. The location of the Route Options to the south of the Conservation Area alongside intervening development means that Moffat conservation area is less sensitive to change.					
	Non-designated heritage assets contained within Dumfries and Galloway Historic Environment Record (HER)	<p>Within Route Option 1 there are nine monument points recorded in the HER. Whilst many of these assets will be of local importance, there are some that may be of regional or even equivalent to national importance. All will be sensitive to physical change but not all will have a setting that contribute to their significance or which interacts with the Route Option.</p> <p>Six of the non-designated assets are burnt mounds dating to the Bronze Age. The function of this monument type is unknown but their typical appearance as clusters within a small area suggest repeated phases of short lived activity. They are therefore susceptible to setting, alongside physical, change with the possibility of this Route Option interrupting</p>	<p>Within Route Option 2 there are ten monument points recorded in the HER. Whilst many of these assets will be of local importance, there are some that may be of regional or even equivalent to national importance. All will be sensitive to physical change but not all will have a setting that contribute to their significance or which interacts with the Route Option.</p> <p>Six of the non-designated points are burnt mounds dating to the Bronze Age. The function of this monument type is unknown but their typical appearance as clusters within a small area suggest repeated</p>	<p>Within Route Option 3, there are eight monument points/polygons recorded in the HER. Three points are burnt mounds dating to the Bronze Age with other assets relating to the historical agricultural use of the landscape and include rig and furrow and a farmstead.</p> <p>Whilst many of these assets will be of local importance, there are some that may be of regional or even equivalent to national importance. All will be sensitive to physical change but not all will have a setting that contribute to their significance or which</p>	<p>Within Route Option 4, there are six monument points/polygons recorded in the HER. Three points are burnt mounds dating to the Bronze Age with other assets relating to the historical agricultural use of the landscape and include rig and furrow and a farmstead.</p> <p>Whilst many of these assets will be of local importance, there are some that may be of regional or even equivalent to national importance. All will be sensitive to physical change but not all will have a setting that contribute to their significance or which interacts with the Route Option.</p>	<p>Within Route Option 5, there are seven monument points alongside various areas of archaeological interest recorded in the HER. Whilst many of these assets will be of local importance, there are some that may be of regional or even equivalent to national importance. All will be sensitive to physical change but not all will have a setting that contribute to their significance or which interacts with this Route Option.</p> <p>Six of the non-designated points are burnt mounds dating to the Bronze Age. The function of this monument type is unknown but their</p>	



Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
		their relationships within the landscape.	phases of short lived activity. They are therefore susceptible to setting, alongside physical, change with the possibility of this Route Option interrupting their relationships within the landscape.	interacts with this Route Option.  The function of the burnt mounds is unknown but their typical appearance as clusters within a small area suggest repeated phases of short lived activity. They are therefore susceptible to setting, alongside physical, change with the possibility of the Route Option interrupting their relationships within the landscape.	The function of the burnt mounds is unknown but their typical appearance as clusters within a small area suggest repeated phases of short lived activity. They are therefore susceptible to setting, alongside physical, change with the possibility of this Route Option interrupting their relationships within the landscape.	typical appearance as clusters within a small area suggest repeated phases of short lived activity. They are therefore susceptible to setting, alongside physical, change with the possibility of the Route Option interrupting their relationships within the landscape.  The HER records the presence of the Roman military road which runs to the east of the scheduled Roman fort. With the presence of other Roman military installations in the immediate area, this asset is particularly susceptible to setting change as this Route Option would likely disrupt the relationships between Roman monuments along the valley.	
<b>Land Use</b>	Existing and Committed Development: areas allocated within the LDP2 including existing buildings/sites, residential use applications and valid planning	As of 31 <sup>st</sup> August 2021, there are no committed developments within or in close proximity to the Route Options with the exception of the application for the Moffat substation (Application reference: 21/1683/SCR) in the north-east of the Study Area which the Scoop Hill OHL is planned to feed into.					There is no preferred route option.



Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
	applications for other non-residential uses of a size and geographic location to be considered 'major areas' (including minerals and wind farm turbines)						
<b>Forestry</b> <sup>26</sup>	Ancient Woodland	There is no AWI within these route options.					On balance, <b>Route Option 3</b> is preferred since this route option can avoid crossing areas of native woodland.
	Native Woodland (NWSS)	There is a total of 3.77ha of NWSS within this route option. There is an area of NWSS east of Crocket that spans the width of this route option and therefore cannot be avoided. All other areas of NWSS can be avoided during route alignment.	There is a total of 4.64ha of NWSS within this route option. There is an area of NWSS that spans the width of this route option south of Breckonside Cottage and therefore cannot be avoided. All other areas of NWSS can be avoided during route alignment.	There is a total of 5.13ha of NWSS within this route option. This can be avoided during route alignment.	There is a total of 1.54ha of NWSS within this route option. There is an area of NWSS next to the River Annan that spans the width of this route option and therefore cannot be avoided. All other areas of NWSS can be avoided during route alignment.	There is a total of 0.48ha of NWSS within this route option. There is an area of NWSS south of Woodland Bridge than spans the width of this route and therefore cannot be avoided.	
	Forestry (NFI)	There is a total of 6.36ha of forestry within this route option. This could be avoided during route alignment.	There is a total of 5.01ha of forestry within this route option. There is an area of forestry south of Breckonside Cottage that spans the width of this route option and therefore cannot be avoided.	There is a total of 7.43ha of forestry within this route option. There is an area of NFI than spans the width of this route east of Woodfoot and therefore cannot be avoided.	There is a total of 3.38ha of forestry within this route option. There is an area of forestry that spans the width of this route east of Woodfoot and therefore cannot be avoided.	There is a total of 0.91ha of Forestry within this route option. This could be avoided during route alignment.	
<b>Hydrology and Flood Risk</b>	Flood Zones and Waterbodies	Route Option 1 crosses six watercourses including the River Annan, Beldcraig Burn,	Route Option 2 crosses seven watercourses including the River	Route Option 3 crosses four watercourses including the River	Route Option 4 crosses four watercourses including the River	Route Option 5 crosses five watercourses including the River	None of the route options can avoid the 200-year floodplain of

<sup>26</sup> The area of forestry (NFI) and native woodland (NWSS) is estimated based on comparison between the mapped data and aerial photography.



Appendix B  
Route Options Appraisal Table

Scoop Hill 132kV Connection Project  
October 2021

Criterion	Sub-Criteria	Route Option 1	Route Option 2	Route Option 3	Route Option 4	Route Option 5	Preference
		<p>Washy Burn, Breconside Burn and unnamed tributaries. However, these can be spanned during route alignment.</p> <p>SEPA Flood Maps indicate that the 200-year floodplain of the River Annan is approximately 470m wide at the crossing point, which cannot be spanned or avoided.</p> <p>The 200-year floodplain of the Breconside Burn is narrow and largely confined to the valley and can be spanned.</p>	<p>Annan, Beldcraig Burn, Washy Burn Breconside Burn and unnamed tributaries. A small waterbody is also present to the north of Washy Burn. However, these can be spanned during route alignment.</p> <p>SEPA Flood Maps indicate that the 200-year floodplain of the River Annan is approximately 470m wide at the crossing point, which cannot be spanned or avoided.</p> <p>The 200-year floodplain of the Breconside Burn is narrow and largely confined to the valley and can be spanned.</p>	<p>Annan, Beldcraig Burn, Mirk Gill and an unnamed tributary of the River Annan. However, these can be spanned during route alignment.</p> <p>SEPA Flood Maps indicate that the 200-year floodplain of the River Annan is approximately 470m wide at the crossing point, which cannot be spanned or avoided.</p> <p>There is a narrow 200-year floodplain associated with the Beldcraig Burn, which can be spanned.</p>	<p>Annan, Beldcraig Burn, Mirk Gill and an unnamed tributary of the River Annan. However, these can be spanned during route alignment.</p> <p>Route Option 4 crosses the River Annan further south than options 1-3 and parallels the river for approximately 800m. At the crossing point the 200-year floodplain of the river is approximately 470m wide and then the route is located entirely within the floodplain as it parallels the river to reach the substation. The floodplain cannot be avoided or spanned.</p> <p>There is a narrow 200-year floodplain associated with the Beldcraig Burn, which can be spanned during route alignment.</p>	<p>Annan, Beldcraig Burn, Mirk Gill and unnamed tributaries. However, these can be spanned during route alignment.</p> <p>Route 5 is within 200-year floodplain of the River Annan for approximately 2.5km as the route parallels the river and the floodplain cannot be avoided.</p>	<p>the River Annan, which is approximately 470m wide at the Moffat substation.</p> <p>However, <b>Route Options 4 and 5</b> are the least preferred as these parallel the river and are within the floodplain for 800m and 2.5km, respectively.</p> <p>Given that <b>Route Option 3</b> crosses the least number of watercourses and does not parallel the floodplain it is the preferred option.</p>
<b>Overall Emerging Preference</b>	<p><b>Overall emerging preferred route is Route Option 3.</b></p> <p>Route Option 3 has the best potential relative to other options to minimise visual effects on residential receptors and the wider landscape. The route avoids the highest ground to the east and north of the study area (limiting visual effects in views from Annandale) and also avoids the Moffat Hills RSA. Route Option 3 requires the least number of watercourse crossings, minimises cultural heritage setting change, does not parallel the River Annan floodplain for any considerable distance and avoids areas of native woodland.</p> <p>During detailed route alignment, further careful consideration will be required to be given to the siting of infrastructure in relation to the concentration of non-designated burnt mounds near the Scoop Hill substation.</p> <p>Whilst Route Option 3 remains the best balance of all the environmental issues considered, felling of commercial woodland, the crossing of the River Annan floodplain and the Western Southern Uplands ESA cannot be avoided and these will be required to be taken into consideration where possible during the detailed design and appraisal stages.</p>						



## **Appendix C**

### **Appraisal of Landscape Sensitivity to OHL Development**


**C.1** Landscape sensitivity is assessed with reference to the existing landscape characteristics and attributes of the landscape. Accordingly, the SNH web based 2019 Landscape Character Assessment has been used as the basis for determining landscape sensitivity across the study area. The following regional Landscape Character Types (LCT) fall within the study area and are mapped on **Figure 5.1a**:

- Foothills – Dumfries and Galloway (175);
- Upland Glens – Dumfries and Galloway (166);
- Upland Fringe – Dumfries and Galloway (172); and
- Middle Dales – Dumfries and Galloway (163).

**C.2** However, the regional landscape character assessments provide only a broad picture of the landscape character of the study area. Accordingly, a finer grain landscape assessment of the study area was undertaken, subdividing this into Local LCT (refer to **Figure 5.1b**). This local landscape character assessment has been verified through fieldwork and provides a useful assessment tool for this routing appraisal.

**C.3** Each Local LCT which is potentially affected by a route option has been evaluated (on its sensitivity to being changed by OHL development of the type proposed) and categorised as having **higher to lower** sensitivity. The application of professional judgement in the use of the Local LCT also draws on the principles set out in the Holford Rules. Indicators of the relative levels of landscape sensitivity to accommodate OHL development are shown in **Table C.1**.

**Table C.1: Indicators of Landscape Sensitivity**

Sensitivity	Definitions
Higher	Landscape character, existing land use, pattern, scale and attributes are vulnerable to being changed or lost resulting from the introduction of OHL development. Key perceptual and aesthetic characteristics are vulnerable to change or loss.
Medium	
Lower	Landscape character, existing land use, pattern, scale and attributes are robust and tolerant of the change resulting from OHL development. The change could be accommodated without geographically extensive and/ or significant adverse effects on (or loss of) key perceptual, physical or aesthetic characteristics.

**C.4** For each Local LCT, the key characteristics are analysed to inform an overall judgement on the Local LCT's sensitivity to OHL development (refer to **Figure 5.1c**). **Table C.2** outlines the rationale for determining landscape sensitivity in relation to key landscape characteristics:

**Table C.2: Characteristics Influencing Landscape Sensitivity Indicators of Landscape Sensitivity**


Criteria	Characteristics indicating a lower sensitivity to OHL development	Characteristics indicating a higher sensitivity to OHL development
Landform and Scale	Flatter or gently undulating landscapes Broad valley landscapes	Steep, complex landscapes Complex topography






Criteria	Characteristics indicating a lower sensitivity to OHL development	Characteristics indicating a higher sensitivity to OHL development
	Larger scale landscapes	Intimate scale landscapes
Landcover and Pattern	Arable, pasture, rough grassland Moorland Simple patterns Landcover which can recover quickly/ does not require complex engineering solutions	Continuous woodland Bog, peat, wetlands Complex patterns Landcover which recovers slowly/ requires complex engineering solutions
Human Influences	Industry, arable farming, presence of large built structures, disturbed areas Landscapes which have experienced a higher level of human influence More developed/ managed landscapes	Remote landscapes Areas with natural characteristics Landscapes with little evidence of human influence
Visual Experiences	Interrupted horizons Simple skylines	Uninterrupted horizons Distinctive/ complex skylines
Settlements	Industrial Sparsely settled arable	Residential Dense patterns of isolated farmstead/ small scale settlements

**C.5** Table C.3 presents LUC's appraisal of landscape sensitivity to OHL development with reference to the Local LCT through which the route options pass.

**Table C.3: Landscape Sensitivity Appraisal**

Local Landscape Character Type	Key landscape characteristics from LUC Finer Grain Landscape Character Assessment	LUC appraisal: Landscape sensitivity to OHL development of the type proposed
Wooded Valley	<p>Landform and Scale: small scale intimate landscape of complex topography including sloping ground and a steep-sided valley;</p> <p>Landcover and pattern: complex landcover featuring coniferous, native and ancient woodland, traversed by numerous small watercourses;</p> <p>Human influence: influence in the form of coniferous forestry, electricity transmission infrastructure (which crosses a narrow part of this LCT to the south) and occasional tracks and dwellings. In the areas of native mature woodland the landscape is more naturalistic in character;</p> <p>Visual Experience: visually contained by woodland within the LCT and the steep enclosing valley sides; and</p> <p>Settlement: largely unsettled with a small cluster of residential dwellings and farmsteads to the north.</p>	<p>The key characteristics including the intimate scale and complex landcover and topography indicate a higher sensitivity to OHL development.</p> 
Valley Floor with Woodland Belts	<p>Landform and Scale: medium scale landscape of flat to gently undulating low lying ground;</p>	<p>The key characteristics including the medium scale and simpler topography; landscape pattern of fields and woodland belts; and</p>

Local Landscape Character Type	Key landscape characteristics from LUC Finer Grain Landscape Character Assessment	LUC appraisal: Landscape sensitivity to OHL development of the type proposed
	<p>Landcover and pattern: more complex pattern of predominantly pastoral farmland, with occasional arable fields, with belts of woodland and scrub along the River Annan, Beldcraig Burn and field boundaries;</p> <p>Human influence: influence in the form of electricity transmission infrastructure, tracks, roads and agricultural management;</p> <p>Visual Experience: views towards the enclosing hills on either side of valley interrupted by woodland belts. Where open views exist electricity infrastructure to the east of the valley is apparent on the skyline; and</p> <p>Settlement: scattered residential dwellings and farmsteads on eastern and western fringes of this landscape.</p>	<p>existing human influences indicate a medium-low sensitivity to OHL development.</p> 
Upland Fringe	<p>Landform and Scale: medium to larger scale landscape of gently rolling and rising ground on the eastern valley side of Annandale;</p> <p>Landcover and pattern: simpler pattern of pastoral fields separated by dry stone walls and post and wire fences, with occasional areas of coniferous and mixed woodland cover;</p> <p>Human influence: traversed by minor roads and existing electricity transmission infrastructure (which follow the grain of the landscape) and influenced by coniferous forestry;</p> <p>Visual Experience: longer distance views to west over Annandale. Views to east contained by foothills on eastern valley side. Complex and varied skylines interrupted by close proximity views of existing large scale electricity infrastructure and occasional areas of forestry and shelterbelts; and</p> <p>Settlement: occasional farmsteads and residential dwellings, focused on the lower ground along the western fringes of this landscape.</p>	<p>The key characteristics including the larger scale, simpler landscape pattern and existing human influence indicate a medium-low sensitivity to OHL development.</p> 
Foothills	<p>Landform and Scale: larger scale landscape of undulating foothills with typically rounded summits;</p> <p>Landcover and pattern: simple landscape pattern of unimproved grassland and heath, interspersed with occasional upland tributaries and small areas of coniferous forestry;</p> <p>Human influence: few enclosures, roads or tracks; some evidence of human influence through coniferous forestry and views over the settled valley landscape to the west;</p> <p>Visual Experience: long distance, large scale and often panoramic views, especially to the west over Annandale. Complex horizons associated with larger hills to east tend to contain views in this direction.</p>	<p>The key characteristics including the limited human influence, complex topography and role this landscape provides in providing a setting in views from Annandale indicate a medium-high sensitivity to OHL development.</p> 



Local Landscape Character Type	Key landscape characteristics from LUC Finer Grain Landscape Character Assessment	LUC appraisal: Landscape sensitivity to OHL development of the type proposed
	This landscape plays an important role in providing a backdrop and setting in views from Annandale; and Settlement: lack of settlement.	

## **Appendix D**

### **Newspaper Advertisement**



## We'd like your views

### Public consultation

#### New Overhead Line Connection from the proposed Scoop Hill Community Wind Farm to Moffat Substation

SP Energy Networks is seeking comments on a new twin 132 kilovolt (kV) overhead line connection, supported on double Trident 'H' wood poles from the proposed Scoop Hill Community Wind Farm substation to Moffat substation in Dumfries and Galloway.

This consultation will run for four weeks from **Monday 25th October to Sunday 21st November 2021**. The closing date for submitting comments will be midnight on **Sunday 28th November 2021**.

The consultation material will remain accessible online and available to download in a pdf format after the **21st November 2021** from:

**[www.spenergynetworks.co.uk/pages/community\\_consultation](http://www.spenergynetworks.co.uk/pages/community_consultation)**

The Routeing and Consultation Report and other consultation materials will be available to download from the webpage above from **Monday 25th October**, and information leaflets and posters will also be distributed locally in advance of this date. Feedback from this event will then be considered by SP Energy Networks prior to the proposed route being determined and progressed to the detailed design stage.

Due to current restrictions relating to the Covid-19 pandemic, a virtual online consultation exercise is being undertaken, rather than an in-person exhibition format. This will allow people to view the project information in a virtual environment and to leave comments.

From **Monday 25th October**, the virtual exhibition room and a feedback questionnaire can be accessed from

**[www.scoophillohl.co.uk](http://www.scoophillohl.co.uk)**

You will be able to talk to us via the live chat service on the virtual exhibition room on the following dates:

**Monday 25th October (2pm-4pm)**  
**Tuesday 26th October (10am-12pm)**  
**Wednesday 27th October (5pm-7pm).**

Comments can also be sent to the project email address:

**[scoophillconnectionproject@spenergynetworks.co.uk](mailto:scoophillconnectionproject@spenergynetworks.co.uk)**

Or by writing to us:

Scoop Hill 132kV Connection Project,  
Land and Planning Team,  
SP Energy Networks,  
55 Fullarton Drive,  
Glasgow, G32 8FA

Please note - Comments at this stage are informal and are made to allow SP Energy Networks to determine whether changes to the route are necessary. An opportunity to comment formally to the Energy Consents Unit will follow at a later stage in the process following consultation by the Scottish Government once the application is submitted to them.

## **Appendix E**

### **Project Leaflet**



## How do I make comments or find out more information?

Your feedback is an important part in helping SP Energy Networks to finalise the proposed route which considers technical, economic and environmental issues along with landowner and public opinion.

Our consultation will run for four weeks and the information will be available from **Monday 25th October 2021** to **Sunday 21st November 2021**. The closing date for you to send your responses to us is midnight on **Sunday 28th November 2021**. Following this date, the information will remain accessible online and available to download.

Please find below the best ways to find out more or talk to us.

**Visit the online virtual exhibition from Monday 25th October 2021:**

**[www.scoophillohl.co.uk](http://www.scoophillohl.co.uk)**

In normal circumstances, we would engage with communities face-to-face through drop-in public exhibitions, however, given current social distancing advice, this is not possible. Therefore, we have prepared an online virtual consultation to replicate an in-person village hall experience. Here you can see detailed maps, read about the proposals, download the project information as a pdf, and provide feedback via the online questionnaire.

**Visit the website:**

**[www.spenergynetworks.co.uk/  
pages/community\\_consultation](http://www.spenergynetworks.co.uk/pages/community_consultation)**

Our dedicated website has lots more information. You can view or download all the project documents, including this leaflet, on the website.

**Talk to us:**

We will be on hand to answer any questions you may have via the live chat service on the virtual exhibition room on the following dates:

**Monday 25th October from 2pm-4pm**

**Tuesday 26th October from 10am-12pm**

**Wednesday 27th October from 5pm-7pm.**

**Email us:** **[scoophillconnectionproject@spenergynetworks.co.uk](mailto:scoophillconnectionproject@spenergynetworks.co.uk)**

**Write to us:** Scoop Hill 132kV Connection Project  
Land and Planning Team  
SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA

## What happens next

- A** Gathering of Feedback from Public Consultation to identify 'Proposed Route'
- B** Request Environmental Impact Assessment (EIA) Screening Opinion from Scottish Government
- C** Undertake Environmental Surveys
- D** Identification of final alignment and associated infrastructure for the Scoop Hill 132kV Connection Project
- E** Undertake Environmental Appraisal (assuming project is not deemed to require an EIA) of the construction and operation of the Scoop Hill 132kV Connection Project
- F** Submit Section 37 application for consent to Scottish Ministers with Environmental Appraisal (circa spring 2023)
- G** Discharge of planning conditions (if consent is granted)
- H** Construction of project (should Scoop Hill Community Wind Farm be granted Section 36 consent)

**Thank you for taking the time to read this leaflet.**



## Scoop Hill 132kV Connection Project

### Public Consultation Leaflet

#### Background

The proposed Scoop Hill Wind Farm by Community Windpower Limited (CWL) is located approximately 5km south-east of Moffat and 11km north-east of Lockerbie in Dumfries and Galloway. CWL submitted an application for consent under Section 36 of the Electricity Act 1989 to Scottish Ministers in November 2020, and a decision remains outstanding.

To meet its licence obligations, SP Energy Networks is proposing a new twin 132 kilovolt (kV) overhead line (OHL) to connect Scoop Hill Wind Farm to the transmission grid system at Moffat substation in Dumfries and Galloway. The new twin OHL connection will be supported on wood poles and will be approximately 2 kilometres (km) in length.

SP Energy Networks operates, maintains and develops the network of cables, overhead lines and substations which transport electricity to connected homes and businesses in Southern and Central Scotland. SP Energy Networks has a legal duty to keep its network up-to-date to safeguard electricity supplies. SP Energy Networks also has a duty to provide a connection for new generation to the wider electricity transmission network.

SP Energy Networks is now seeking views on the proposals and the routeing work which has been undertaken to date for the Scoop Hill 132kV Connection Project. Further information about the project, our plans for consultation, and how to make comments, is provided overleaf.

Photograph: Existing 400kV ZV Route

## What will the new connection look like?

Given the output capacity of Scoop Hill Community Wind Farm (circa 525 megawatts (MW)), and to avoid the need for larger steel towers, the connection will require two new twin 132kV OHLs supported on wood poles connecting the wind farm substation to the existing Moffat substation. The twin 132kV OHLs will run in parallel and will each carry one 3-phase circuit, which means that the wood poles will support three conductors (electrical wires). The conductors will be supported on two wood poles or double 'H' poles as shown opposite. The wood poles will have a typical height of between 10 metres (m) and 15m, and the span (distance between each wood pole on each OHL circuit) will be approximately 80m-90m. The spacing between each OHL will be approximately 20m to maintain safety clearances. The wood poles will be dark brown in colour and will weather over the years to light grey. The connection will also require electrical capacity at Moffat substation to be increased. This will be achieved by installing a new 400/132kV transformer and two 400kV and 132kV circuit breaker bays. The new transformer will measure approximately 11m x 20m x 7.5m. The Scoop Hill 132kV Connection Project will remain in place for the duration of the wind farm should it obtain planning consent.



## Routing

SP Energy Networks has been working with independent environmental consultants to identify potential route options for the Scoop Hill 132kV Connection Project. Our objective is to identify a route which meets the technical requirements of the electricity system, which are economically viable and cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it.

Following an established best practice methodology for routeing OHLs<sup>1</sup>, five route options were identified, as shown opposite. The five route options have the same start and end points, i.e. Scoop Hill Wind Farm substation and Moffat substation.

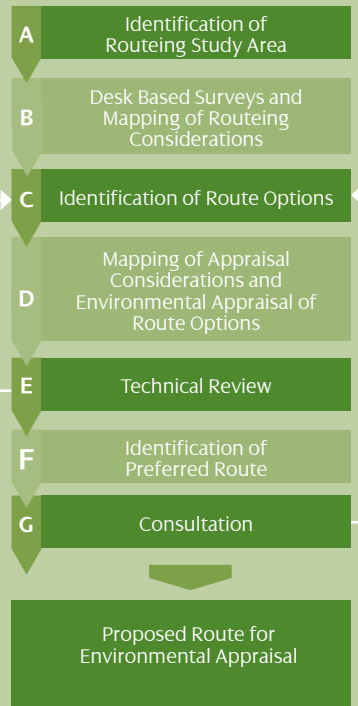
The five route options were appraised against environmental and technical criteria, including local landscape character and views, cultural heritage, biodiversity, hydrology and flood risk, forestry, land use, topography, proximity to existing OHLs and route length to identify the preferred route. The preferred route is the one which achieves the best overall balance between limiting impacts on the environment and people, whilst also meeting SP Energy Networks' technical requirements.

SP Energy Networks is committed to engaging with stakeholders, including local communities, through the consultation process, and your feedback will be used to review the routeing findings and inform the next steps in the Scoop Hill 132kV Connection Project.

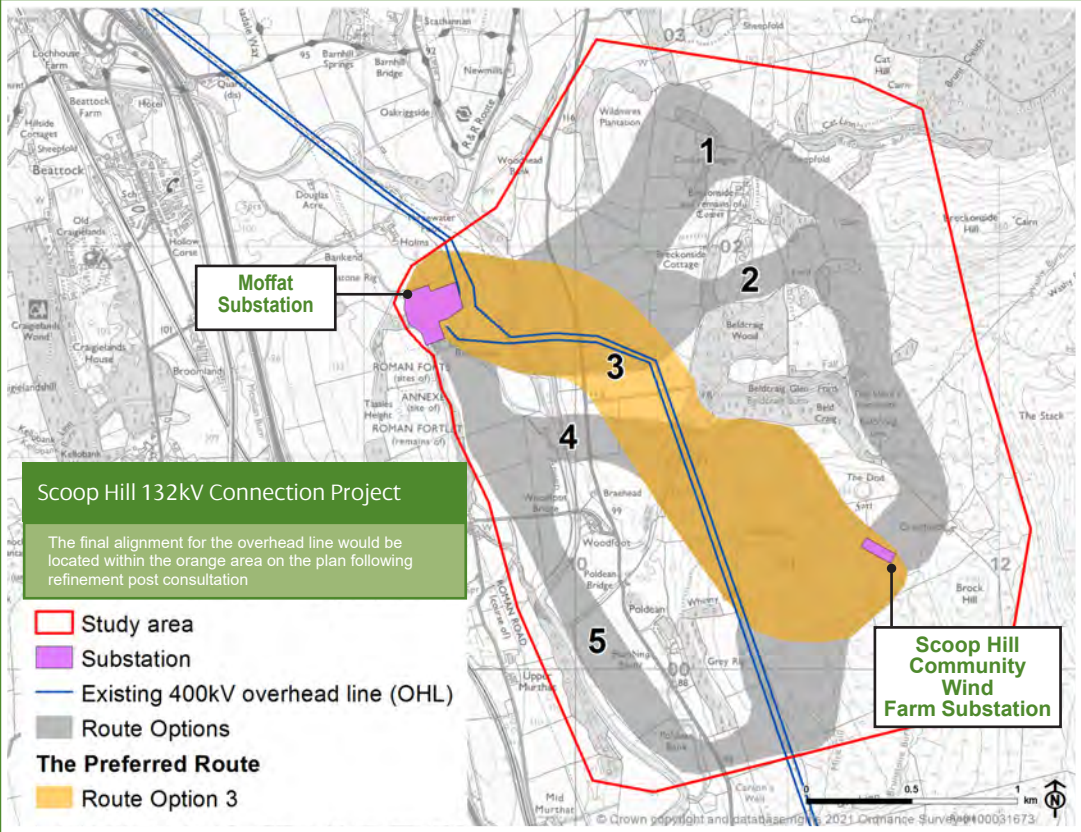
<sup>1</sup> Available at: [https://www.spenergynetworks.co.uk/userfiles/file/SP\\_ENERGYNETWORKS\\_Approach\\_to\\_Routeing\\_Document\\_2nd\\_version.pdf](https://www.spenergynetworks.co.uk/userfiles/file/SP_ENERGYNETWORKS_Approach_to_Routeing_Document_2nd_version.pdf)

More information about the process we have followed to identify and appraise route options to select the preferred route for Scoop Hill 132kV Connection Project can be found in our Routeing and Consultation Document (September 2021) available on our consultation website (see back page for details).

## Routeing Methodology



## Scoop Hill 132kV Connection Project



## What we would like your views on?

As part of the consultation we would particularly like your views on:

- 1 The preferred route (Route Option 3) for the Scoop Hill 132kV Connection Project.
- 2 Any of the alternative route options we considered during the routeing process.
- 3 Any other issues, suggestions or feedback you would like us to consider. We would particularly like to hear your views on your local area, for example areas you use for recreation, local environmental features you would like us to consider, and any plans you may have to build in proximity to the preferred route.

Please note comments at this stage are informal comments and are made to allow SP Energy Networks to determine whether changes to the preferred route are necessary. An opportunity to comment formally to the Scottish Government Energy Consents Unit (ECU) will follow at a later stage in the process following submission of the Section 37 application.



## Appendix F

### Poster

## We'd like your views

The proposed Scoop Hill Wind Farm by Community Windpower Limited (CWL) is located approximately 5km south-east of Moffat and 11km north-east of Lockerbie in Dumfries and Galloway. CWL submitted an application for consent under Section 36 of the Electricity Act 1989 to Scottish Ministers in November 2020, and a decision remains outstanding.

To meet its licence obligation to connect Scoop Hill Community Wind Farm to the electricity grid, SP Energy Networks is proposing a new twin 132 kilovolt (kV) overhead line between Scoop Hill Community Wind Farm substation and Moffat substation in Dumfries and Galloway. The connection will be supported on double Trident 'H' wood poles and the route will be approximately 2.5km in length.

SP Energy Networks is now seeking views on the proposals and the routing work which has been undertaken to date for the Scoop Hill 132kV Connection Project so we can take your comments into account as we finalise our plans.

**Our public consultation runs from  
25th October to 21st November 2021.**

**The closing date for you to send your responses to us is midnight on  
28th November 2021.**

Please find below the best ways to find out more or talk to us.



**Visit the online virtual exhibition from Monday 25th October 2021:**

**[www.scoophillohl.co.uk](http://www.scoophillohl.co.uk)**

During October and November, we will hold a virtual exhibition where you can view our proposals and ask questions of our project team. We would ordinarily hold public exhibitions in-person, however this is not possible due to the Covid-19 pandemic.



**Visit the website:**

**[www.spenergynetworks.co.uk/  
pages/community\\_consultation](http://www.spenergynetworks.co.uk/pages/community_consultation)**

Our project website will hold all the public consultation information. This will remain accessible online and available to download following the consultation period.

**Talk to us:**

We will be on hand to answer any questions you may have via the live chat service on the virtual exhibition room on the following dates:

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**Email us:**

**[scoophillconnectionproject@spenergynetworks.co.uk](mailto:scoophillconnectionproject@spenergynetworks.co.uk)**



**Write to us:**

**Scoop Hill 132kV Connection Project  
Land and Planning Team**

**SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA**

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



## **Appendix G**

### **Consultees**

The stakeholder groups listed in **Table G1** below were contacted via email unless otherwise noted.

**Table G1: List of Stakeholders Consulted**

Consultee	
British Horse Society	Scottish Rights of Way and Access Society (ScotWays)
British Trust for Ornithology (Ayrshire and Cumbrae)	Scottish Water
Central Scotland Bat Group	Scottish Wildlife Trust
Crown Estate Scotland	SEPA
Defence Infrastructure Organisation	Dumfries and Galloway Council (Planning)
Scottish Government energy Consents Unit	South Scotland Red Squirrel Group
Fisheries – Local District Salmon Fisheries	Sustrans Scotland
Fisheries Management Scotland	The Coal Authority
Historic Environment Scotland	The Health and Safety Executive (HSE)
Mountaineering Scotland	The National Trust for Scotland
National Farmers Union of Scotland	The Ramblers Association
NATS Safeguarding	Dumfries and Galloway Council Archaeology Service
NatureScot	Transport Scotland
Nuclear Safety Directorate (HSE)	John Muir Trust
RSPB Scotland	Joint Radio Company
Scottish Badgers	Civil Aviation Authority – Airspace.
Scottish Forestry	Visit Scotland
Scottish Outdoor Access Network	British Telecom (BT)
Kilpatrick Juxta Community Council	Wamphray Community Council
Moffat and District Community Council	