SP ENERGY NETWORKS

The Kendoon to Tongland 132kV Reinforcement Project

Summary of Feedback from Third Round of Consultation

July 2019

Kendoon to Tongland Reinforcement (KTR) Project

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SP Energy Networks
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Purpose of this document

SP Energy Networks (SPEN) is pleased to provide this report summarising the feedback received during the third round of public consultation, carried out between 20 November 2017 and 26 January 2018, on the proposed Kendoon to Tongland 132kV Reinforcement (KTR) Project.

In total, 57 pieces of feedback were received and scrutinised.

Executive summary

Background

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

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

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

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

The KTR Project consists of proposals for:

- A new 132kV double circuit steel tower overhead line between Polquhanity and the existing Glenlee substation, via the existing Kendoon substation;
- A new 132kV single circuit wood pole overhead line between Carsfad and Kendoon;
- A new 132kV single circuit wood pole overhead line between Earlstoun and Glenlee;
- A new 132kV double circuit steel tower overhead line between Glenlee and Tongland;
- Extending the existing 132kV Glenlee substation (this work needs to be completed first, and is subject to a separate planning application and consultation process); and
- Removing the existing 132kV steel tower overhead lines from Polquhanity to Glenlee (including Carsfad and Earlstoun), and Glenlee to Tongland (once the new overhead lines and substation works have been completed and commissioned).

Whilst not part of the KTR project, an existing 132kV overhead line which runs for 46km north east from Tongland towards Dumfries, where it crosses the playing fields on Westfield Road before ending at the town's substation, will also be removed entirely following completion of the project.

Third round of consultation

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

The third round of consultation took place from 20 November, 2017, to 26 January, 2018. It was the last of three rounds of consultation to be carried out by SPEN for the KTR Project prior to applying for development consents from Scottish Ministers to build the Project[1].

Whilst previous rounds of consultation had considered route 'corridors' and potential routes, the third round of consultation focused on detailed route alignments for the new high voltage overhead lines within the 200m proposed routes, including potential locations for the steel towers and wood poles that will carry them. It also considered construction accesses and working areas.

SPEN posted leaflets to around 3,500 homes and businesses within a kilometre of the proposed route alignments. The leaflet gave an overview of the project, explained how people could find out more detailed information, and set out how they could make their views known.

This was supported by the project website **www.spendgsr.co.uk**.

Information was also sent to elected representatives of Dumfries and Galloway Council, in whose area the project is proposed, as well as local Members of the Scottish Parliament, the Member of Parliament, statutory consultees, community councils, non-statutory organisations and local interest groups to encourage participation in the consultation.

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

During the third round of consultation, SPEN held three drop-in exhibitions and events across the project consultation zones, which were attended by 66 people. Members of the project team also attended meetings with other individuals and organisations on request and actively engaged with a number of local interest groups.

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

Feedback

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

During the third round of consultation, 57 pieces of feedback were received. These encompassed comments from 56 named individual members of the public and other consultee organisations, including 3 statutory organisations. The feedback comprised 41 official consultation feedback forms (23 paper and 18 online) and 16 pieces of feedback in other formats (15 emails and 1 letter). Every feedback form, letter and email received was recorded, together with comments received at consultation meetings, and the feedback analysed and considered.

This report summarises the feedback received. The project team continues to consider all of the feedback received as part of the development of the proposals comprising the project.

[1] The terms KTR Project and project are used interchangeably within the report.

Comments on the project in general

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

There were also concerns about the possible impact of the project on the tourism industry and, as in the last round of consultation, there were a significant number of comments expressing support for undergrounding all or parts of the KTR Project.

A number of responses received disagreed with SPEN's route alignment in Zone C, with a strong preference for the new route to follow the same broad corridor as the existing 132kV overhead line east of Loch Ken.

With the emergence of the detailed route alignment, a number of people also had concerns about specific potential tower and pole locations, the impact of construction work and HGV traffic.

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

Comments on the route alignments

The majority of feedback received related to the proposed route alignment in Zone C (Glenlee to Tongland), and in particular the section passing through the Galloway Forest Park and close to Mossdale.

Comments included some support for SPEN's route alignment, but a number of people reiterated their preference that the new line should either follow the route of the existing 132kV overhead line to the east of Loch Ken, or should be placed underground. Reasons given included concerns over visual impact, the impact of construction work, and the potential negative effect of both of these factors on local tourism.

A number of people who commented on the project overall, rather than a particular Zone, also asked SPEN to consider undergrounding the new overhead lines.

A number of site-specific issues were raised in relation to particular tower or pole locations and construction accesses.

SPEN considered each of these site-specific issues following the consultation. Separately, the scoping response received from the Scottish Ministers (October 2017) requested that SPEN undertake further work to consider Project alternatives (including undergrounding) where feedback from public consultation has identified particular 'pinch points' on the overhead line. This matter is discussed in further detail in section 6.2.

To read the summaries of the comments of members of the public on the route alignments, and SPEN's responses to them, please see section 6.4 of this report. Comments from other stakeholder organisations are contained in **Appendix A**.

Comments on SPEN's consultation

People's comments on how SPEN had conducted the third round of consultation were largely complimentary, but there were also comments questioning whether the consultation itself was meaningful and whether SPEN had already decided on the final outcomes.

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

SPEN's conclusions from the third round of consultation

SPEN has reviewed and considered in detail all feedback received from the public, consultee bodies and local interest groups in relation to the third round of consultation. In addition SPEN has considered a number of additional technical studies (including an underground cable study) and further environmental field work to inform its response to the local issues raised.

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

- Final route alignments including tower and pole locations;
- Construction accesses, haul routes and working areas;
- Opportunities for mitigation measures; and
- The consultation process itself.

The feedback suggested a number of modifications or alterations to route alignments, tower and pole locations, construction accesses and working areas which SPEN has considered in detail. These have resulted in some changes to the route alignments that SPEN now proposes to take forward through the Environmental Impact Assessment (EIA) process and subsequent applications for consent and deemed planning permission, and are explained in more detail in section 6.

The conclusions of the review following the third round of consultation are in Chapter 7.

1 Overview

1.1 Introduction

1.1.1 The new overhead lines forming part of the KTR Project will require the submission of applications for consent under section 37 of the Electricity Act 1989 and deemed planning permission. These will be determined by Scottish Ministers with the process being administered by the Scottish Government Energy Consents and Deployment Unit (ECDU).

1.1.2 While there are no formal requirements for pre-application consultation (PAC) in seeking section 37 consent/deemed planning permission, SPEN is embracing best practice guidance which encourages applicants to engage with stakeholders and the public in order to develop its proposals in advance of applications being made. This guidance is outlined in the Scottish Government Energy Consents and Deployment Unit's Good Practice Guidance (January 2013).

1.1.3 SPEN's consultation strategy has therefore been built around consulting on proposals at each stage of the development process to ensure that all stakeholders and individuals with an interest are kept up to date and, most importantly, have a chance to influence the development of the project. A fundamental part of this approach is reporting back to both stakeholders and decision makers on how the feedback received has actually influenced the development of the project.

1.1.4 All work undertaken on pre-application consultation will be detailed in a final PAC report to be submitted with the section 37 applications to Scottish Ministers.

1.1.5 The PAC report will demonstrate how feedback from consultees has influenced the development of the project, as well as how the consultation itself has complied with relevant legislation and guidance.

1.1.6 Following the submission of the applications for section 37 consent and deemed planning permission, the Scottish Government ECDU will carry out a statutory consultation with the public and stakeholders, including Dumfries & Galloway Council.

1.2 SPEN's role

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

1.2.2 The location of SPEN's transmission network – lying between the Scottish Hydro Electric (SHE) transmission network in northern Scotland and the Scottish islands, and the National Grid (NGET) transmission network in England – means it has a key role linking the UK transmission system together.

1.3 SPEN's commitment to engagement

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

1.3.2 SPEN attaches great importance to the effect that its work may have on the environment and on local communities. In seeking to achieve 'least disturbance', SPEN is keen to engage with key stakeholders, including local communities and others who may have an interest in the project. This engagement process begins at the early stages of a project's development, and continues into construction once consent has been granted.

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

1.3.4 In addition, SP Transmission Plc, as holder of a transmission licence, has a duty under section 38 of and Schedule 9 to the *Electricity Act 1989*, when putting forward proposals for new electricity lines and other transmission development, to have regard to the desirability of the preservation of amenity, the natural environment, cultural heritage, landscape and visual quality, as well as the effect on communities. The Schedule 9 Statement can be found on the project website, www.spendgsr.co.uk.

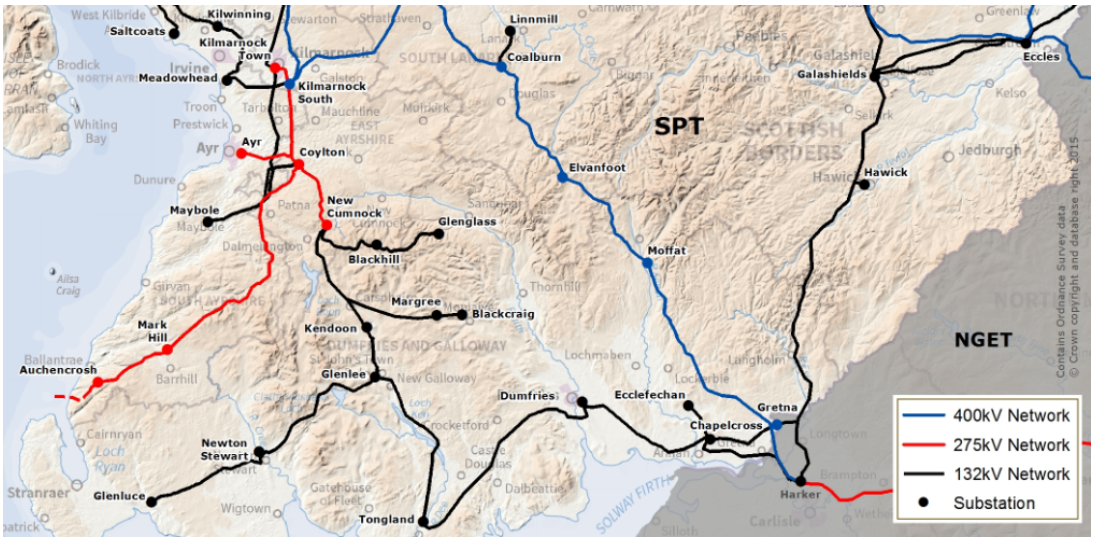
2 The Kendoon to Tongland 132kV Reinforcement (KTR) Project

2.1 Need for the project

2.1.1 The existing electricity transmission system in the south-west of Scotland was developed between the 1930s and 1970s to supply local customers and to connect the area's hydro generation schemes. It currently serves more than 83,000 customers.

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

Figure 2.1 Electricity transmission system in south-west Scotland



2.1.3 SPEN assessed this network as part of its asset replacement programme, and identified nearly 90km of the transmission lines in Dumfries and Galloway as approaching the end of their operational life. These included the lines running from Kendoon to Glenlee, from Glenlee to Tongland, and from Tongland to Dumfries. As assets get older, maintenance work becomes more critical and more difficult, and the exposure to unplanned outages (faults) increases. Asset replacement is essential to provide secure, reliable supplies to existing and future customers.

2.1.4 The KTR Project will include upgrading the existing 132kV transmission network between Polquhanity (which is approximately 3km north of the existing Kendoon substation), Kendoon, Carsfad, Earlstoun, Glenlee and Tongland, to replace existing end-of-life infrastructure, enhance security of supply and provide some additional capacity.

2.2 Description of the project

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

2.2.2 The KTR Project proposes the following:

- A new 132kV double circuit steel tower overhead line between Polquhanity and the existing Glenlee substation, via the existing Kendoon substation;
- A new 132kV single circuit wood pole overhead line between Carsfad and Kendoon;
- A new 132kV single circuit wood pole overhead line between Earlstoun and Glenlee;
- A new 132kV double circuit steel tower overhead line between Glenlee and Tongland; and
- Extending the existing 132kV Glenlee substation to accommodate the extra equipment we need to operate the new overhead lines.

2.2.3 Once the new overhead lines and substation works comprising the KTR Project have been completed and commissioned, the existing 132kV steel tower overhead lines from Polquhanity to Kendoon, Kendoon to Glenlee (including Carsfad and Earlstoun), and Glenlee to Tongland will be removed. The existing overhead line from Tongland to Dumfries will also be removed, although this does not form part of the KTR Project. Further details of the components of the KTR Project (listed in 2.2.2 above) are provided in Chapter 2 of the *KTR Project: Consultation Round Three: Consultation Document (October 2017)*, which can be found on the project website www.spendgsr.co.uk.

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

2.2.5 The extension of Glenlee substation was not included in the third round of consultation. This is because the substation extension needs to be completed before SPEN can build the new overhead lines. As a consequence, SPEN needs to accelerate the application process and a planning application is being submitted to Dumfries and Galloway Council specifically for Glenlee substation. This will be separate from the applications for section 37 consent/deemed planning permission being lodged with the Scottish Government for the KTR Project.

2.2.6 A separate public consultation on the proposed Glenlee substation extension took place from Monday 12 March 2018 to Friday 06 April 2018. You can find more information about this on the project website at www.spendgsr.co.uk

FIG 2.2

KTR Summary of Feedback to Third Round Consultation

Figure 2.2: KTR Existing Network and Points of Connection

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

Map Scale @ A3: 1:150,000

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CB:JN EB:nunn_j LUCGLA FIG02-02_6117-001_KTR_ExistingNetwork 02/04/2019

3 Third round of consultation

3.1 Consultation strategy

3.1.1 SPEN's consultation strategy for the KTR Project is founded on a premise of consulting on proposals at each stage of the development process, ensuring that all stakeholders and individuals with an interest are kept up to date and, most importantly, have a chance to influence the development of the project.

3.1.2 A fundamental part of this is reporting back to both stakeholders and decision makers on how the feedback received has actually influenced the development of the project.

3.1.3 Based on SPEN's commitments to engagement and the legislative requirements set out in Section 1, the KTR Project has been subject to three rounds of consultation. These are:

- First round: Public consultation on preferred corridors, which was carried out from 08 June to 31 August 2015;
- Second round: Public consultation on preferred routes, which was carried out from 31 October to 21 December 2016; and
- Third round: Public and pre-application consultation on detailed route alignment (known as the 'development envelope'), including proposed tower and pole locations, construction accesses and working areas, which was carried out from 20 November 2017 to 26 January 2018.

3.1.4 The strategy for the first round of consultation was based on the statutory requirements and government guidance on consultation for energy consents outlined in section 1.1.2 of this report. It was designed to ensure that stakeholders:

- Had access to project information and understood its development;
- Could put forward their own views and be confident that issues raised would be considered;
- Played an active role in developing and influencing SPEN's proposals; and
- Received timely responses and were informed about progress and outcomes.

3.1.5 Building on this, prior to the start of the second round of consultation, SPEN engaged with statutory stakeholders to set out an improved approach and framework. This took account of feedback about the consultation process itself received during the first round.

3.1.6 SPEN continued to follow this approach prior to the third round of consultation, introducing further improvements, particularly around accessibility of consultation events and information (see 3.3.16).

3.2 Ongoing stakeholder engagement

3.2.1 SPEN has engaged with statutory and non-statutory consultees from an early stage in the development of the project.

3.2.2 SPEN has continued to consult statutory stakeholders through its Statutory Stakeholder Liaison Group (SSLG), formed in 2014, which is chaired by the Scottish Government and includes Scottish Natural Heritage, the Scottish Environmental Protection Agency, Historic Environment Scotland, the Forestry Commission, and Dumfries & Galloway Council. The SSLG provides a forum for considering the planning, environmental, cultural and natural heritage issues that arise from the project.

3.2.3 Prior to the second round of consultation, the Scottish Government established a separate Community Liaison Group (CLG) as a forum for representatives of communities directly affected by the KTR Project. CLG members receive information on project development and are able to raise issues with the Scottish Government and SPEN.

3.2.4 No amendments were proposed by the SSLG in respect of SPEN's consultation strategy for the second or third rounds of consultation.

3.2.5 More information about the SSLG and CLG can be found on the Scottish Government website at: https://www2.gov.scot/Topics/Business-Industry/Energy/Infrastructure/Energy-Consents/Kendoon-Tongland

3.3 Activities in the third round of consultation

3.3.1 The third round of consultation sought to gather feedback on the detailed route alignments, including potential tower and pole locations, construction accesses and working areas, to help SPEN finalise the development design to be taken forward to EIA and reported in an EIA Report which will be submitted in support of the section 37 consent applications to the Scottish Ministers. This was done by:

- Explaining the development, changes and ongoing need for the KTR Project;
- Explaining the process SPEN used to identify the route alignments and plot the locations for towers, poles, construction accesses and working areas, using detailed topographical, engineering and environmental information;
- Inviting statutory and non-statutory consultees, other bodies, the public and local communities to comment on the project, SPEN's proposals and the consultation process; and
- Recording, considering and responding to all feedback, clearly demonstrating how it has influenced the KTR Project.

Consultation zones

3.3.2 To make feedback easier, and for consistency with the second round of consultation, SPEN divided the project into three sections corresponding to the three main connection areas. These sections also reflect the way information is presented in the *KTR Project: Consultation Round Three: Consultation Document (October 2017)*, allowing documentation to be easily compared.

3.3.3 To ensure residents closest to the proposals were consulted directly, SPEN defined consultation zones in each section, which included all residential and business addresses within and close to the study area. These consultation zones were defined as an area generally extending to a kilometre either side of the study areas.

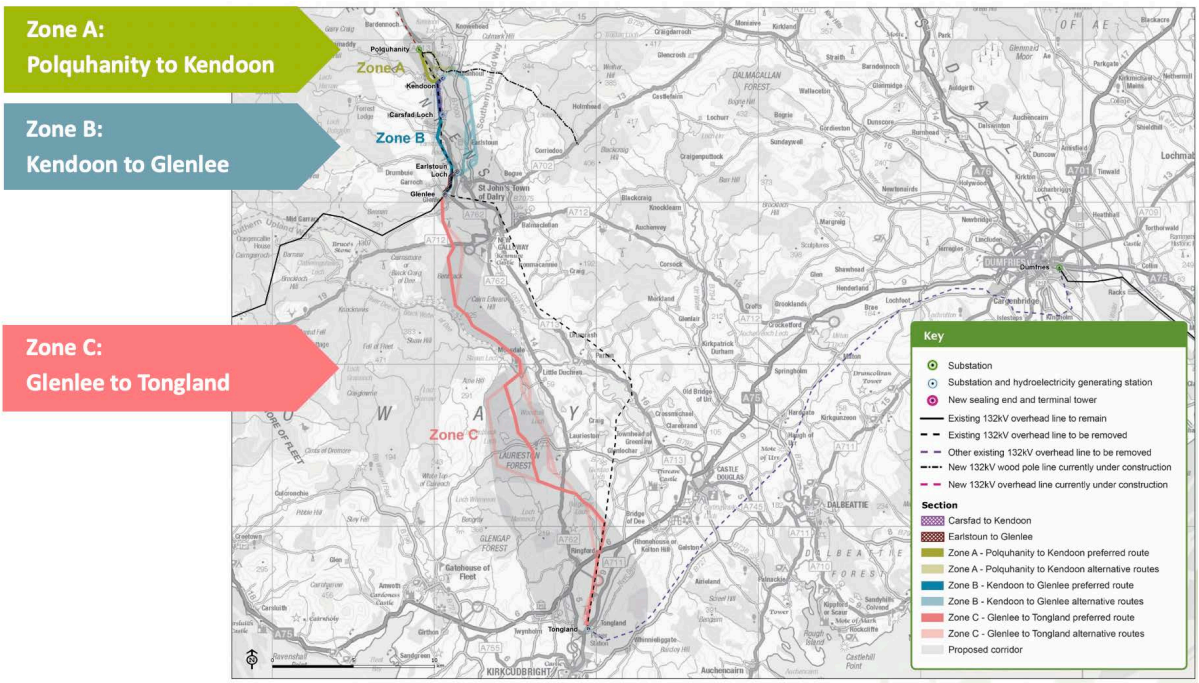
3.3.4 Where the consultation zone bisected the town of Kirkcudbright it was extended to include the entire town in order to ensure engagement was not divisive or inappropriate.

3.3.5 The consultation zones are shown in **Figure 3.1 a**nd are described below, travelling from north to south:

- Zone A: From a connection point at Polquhanity to (and including) Kendoon substation;
- Zone B: From Kendoon substation to Glenlee substation; and
- Zone C: From Glenlee substation to Tongland substation.

3.3.6 The consultation zones were used to define areas for direct mailing of consultation literature and to make commenting easier. However, they were not restrictive or used to limit the numbers who could make comment. All members of the public were encouraged to participate in the consultation, attend exhibitions or make comments using one of the channels established for this purpose.

Figure 3.1:



The launch of consultation

3.3.7 SPEN's third round of consultation started on 20 November 2017 and ran for nearly ten weeks until 26 January 2018. The consultation period was longer than in previous rounds because it included the Christmas holiday period.

3.3.8 The focus of the third round of consultation was to ask for people's views on the work carried out to identify the alignments of the overhead lines following the second round of consultation. In particular, SPEN asked for feedback on:

- The suggested overhead line alignments, including potential tower and pole locations;
- Suggested locations for temporary construction accesses and working areas;
- The removal of existing overhead lines;
- Any other issues, suggestions or feedback, such as observations on areas used for recreation, local environmental features, and any plans to build along the line route; and
- The consultation process itself.

3.3.9 The official communications channels established during previous rounds of consultation were re-used, due to their familiarity among existing stakeholders. These were used to answer queries and collect feedback. They were:

- A dedicated Freephone number **0800 157 7353**;
- A dedicated project email address **dgsr@communityrelations.co.uk**; and
- A Freepost address **FREEPOST SPEN DGSR**.

3.3.10 A wide range of materials was produced and circulated to launch and raise awareness of the project in advance and invite people to take part in the consultation. These are described below.

Email announcement

3.3.11 An email announcing the start of the consultation, and containing a link to the project website, was sent to over 900 recipients who had registered for updates during previous stages of the project.

Project leaflet

3.3.12 To help people provide informed feedback, a project leaflet was produced as a guide. This leaflet was the principal form of direct communication with local communities and provided an overview of the project, including project need and the work undertaken up to that point with regards to overhead line routeing. The format was A4 which folded out to A1, revealing a summary map of the entire project plus detailed maps of each consultation zone, including the route alignments and potential tower and pole locations. The leaflet also provided clear details of how to take part in the consultation, where to obtain more information, and a full list of exhibitions and information points. A copy of the leaflet can be found at the project website www.spendgsr.co.uk.

3.3.13 The leaflet was posted in a clearly marked and branded envelope to all properties in postcodes inside the consultation zones on 10 November 2017. This mailing, in conjunction with other advertising and promotion, launched the second round of consultation and included around 3,500 residents and businesses. It was timed to be received two weeks before the start of the consultation.

3.3.14 Leaflets were made available at public information points and on the consultation website. Further copies were also sent directly to all political, statutory and non-statutory stakeholders, as well as landowners, identified local groups and community organisations.

Public exhibitions

3.3.15 Three public exhibitions were held at the start of the consultation, at publicly accessible venues and locations within the consultation area. Because of the detailed local focus of the third round of consultation, it was decided, following consultation with the SSLG, not to hold a fourth event outside the consultation area in Dumfries (as had happened during the second round of consultation). The locations and dates of all the public exhibitions are detailed in Table 3.1 'List of public exhibitions'.

Table 3.1 List of public exhibitions

Dates and times	Location
21 November 2017, 2pm until 8pm	CatStrand Arts & Visitor Centre, New Galloway
22 November 2017, 2pm until 8pm	Kirkcudbright Parish Church Hall
23 November 2017, 2pm until 8pm	Mossdale Village Hall

3.3.16 SPEN paid particular attention to accessibility of venues and provision of information for differently-abled visitors at third round consultation events. This included selecting venues with step-free access and disabled parking areas, providing an induction hearing loop at each venue for people with hearing difficulties, providing a folding A4 magnifier, with stand, to aid people in viewing table-top maps, and providing water bowls for assistance dogs.

Figure 3.2 KTR third round consultation public exhibition

Figure 3.3 KTR third round consultation public exhibition

3.3.17 The three public exhibitions were widely publicised through the project website, project leaflet, local newspaper advertising and publicity.

3.3.18 At the public exhibitions, people were able to view SPEN's proposals and talk to the project team. Comprehensive information about the project was made available with reference copies of key project documents and large-scale maps on display. Visuals of the banners used at the exhibitions are contained in **Appendix C**.

3.3.19 Project leaflets, feedback forms and FREEPOST envelopes were available to take away, together with ancillary information regarding SPEN's other services and a leaflet produced by the Energy Networks Association about electric and magnetic fields (EMFs).

3.3.20 USB computer pen drives containing project consultation documents were also made available at the exhibitions, and mailed on request to people who had difficulty viewing documents online (usually due to poor internet connectivity) and/or who could not easily reach an information point.

3.3.21 A 3D computer visualisation giving a representation of what the overhead lines may look like in the landscape helped people gain an understanding of the likely scale and visibility of the lines from key viewpoints, from individual tower and pole locations, and from people's properties (subject to properties being within the mapping area). Trained technicians were available to operate the 3D visualisation on two separate screens.

3.3.22 The computer operators were among a team of around 10 people provided by SPEN for each public exhibition to ensure as many people as possible had the opportunity to engage directly with the project team. SPEN ensured the consultation team included individuals with specialist expertise in key areas including planning, environment, health, construction and the consultation process to help ensure as many people as possible received comprehensive answers to their questions.

3.3.23 Although people were encouraged to ask questions and share their views with the team, attendees at exhibitions were advised to submit their formal responses via the official consultation channels, or using the available printed and electronic forms. This was to help avoid misinterpretation and errors in recording feedback second-hand, particularly during busy periods.

Feedback form

3.3.24 A feedback form was developed for stakeholders and the public to provide their comments and formally register their views. The form included separate sections for comments relating to Zone A, Zone B and Zone C, the consultation process itself, and any other comments anyone wished to make. A copy of the feedback form can be found in **Appendix B.**

3.3.25 In addition to the open questions, the form also asked people how they had heard about the consultation, to allow SPEN to monitor the effectiveness of different communication channels, and requested data including respondents' names, addresses and contact details, to allow SPEN to respond to individuals on specific issues.

3.3.26 A digital version of the feedback form was also developed for the consultation website, to encourage people to submit their feedback online.

Project website

3.3.27 The address for the project website is **www.spendgsr.co.uk**. The website provides comprehensive information about the project, including updates as the project develops, a 'frequently asked questions' section, and maps of the consultation zones listed in paragraph 3.3.5. Key project documents from current and previous rounds of consultation are available to download, together with lists of exhibitions and information points, printable maps, and a printable feedback form.

3.3.28 The website also allowed for online consultation and included a dedicated area where visitors could complete and submit the consultation feedback forms. As part of the 'Contact us' section, people are also able to register to receive project updates by email.

3.3.29 During the consultation period, the website received over 1,500 visits.

Media relations

3.3.30 To coincide with the launch of the third round of consultation, a press release was issued to the local media in the project area to publicise the consultation and encourage local people to participate.

Advertising and other promotion

3.3.31 In promoting the third round of consultation, SPEN placed quarter-page advertisements in the public notices sections of local newspapers in editions dated 16 and 17 November 2017. These editions were targeted to publicise the public exhibitions taking place the following week. The newspapers' combined circulation areas covered all consultation zones. See **Appendix D** for copies of the adverts.

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

3.3.33 A free-standing A-board advertising the presence of a live exhibition was also produced for use outside venues on exhibition days.

Figure 3.4 A-board used outside KTR Project exhibitions

Information points

3.3.34 Folders containing project information were deposited on 14 November 2017 at Dalry Library, Kirkcudbright Library, Dumfries Ewart Library, and Dumfries Planning Office, and were available to view free of charge throughout the consultation period.

3.3.35 Each folder included an explanatory covering letter and inspection copies of the following key consultation documents:

- Project leaflet and map;
- KTR Project: Consultation Document (October 2017);
- KTR Scoping Report (May 2017);
- Scottish Government Scoping Response (October 2017);
- KTR Project: Summary of Feedback from 2016 Consultation;
- Appendices to the summary of feedback from 2016 Consultation; and
- Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment available on www.spendgsr.co.uk.

Close of the third round of consultation

3.3.36 The third round of consultation formally closed on 26 January 2018, but SPEN has continued to engage with respondents, consultees and local interest groups since that date, and ongoing discussions continue to inform development of the final proposals.

3.4 Who SPEN consulted

3.4.1 SPEN invited consultation responses from a wide range of statutory and non-statutory consultees, as follows:

- Statutory consultees (including the local authority), both directly and through the Statutory Stakeholder Liaison Group (see section 3.4 for SSLG membership);
- Community representatives, both directly and through the Community Liaison Group;
- Non-statutory consultees;
- Community councils;
- Elected representatives (MPs, MSPs and councillors);
- Landowners;
- Local interest organisations and groups;
- Residents and businesses within the consultation zone (approximately 3,500 addresses within approximately 1km of the route); and
- Members of the public, including visitors to the area and the wider population.

4 Process for managing responses

4.1 Mechanisms for feedback

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

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

4.1.2 The feedback form (**Appendix B**) was also available at the public exhibitions and could be completed immediately or returned later using the project Freepost address. The feedback forms could also be downloaded or completed and submitted online on the project website www.spendgsr.co.uk.

4.2 Processing responses and correspondence

4.2.1 All consultation responses were received centrally at the KTR Project contact centre, where they were logged and recorded for analysis.

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

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

Logging procedure

4.2.4 Each consultation response was sent a standard acknowledgement (in the form of an automated response for internet and email submissions) and given a unique identification number.

4.2.5 Where given by the respondent, contact details were recorded and added to the communication database so respondents could receive project updates.

Assessment and processing

4.2.6 All items of feedback were individually assessed to establish whether the correspondent requested or needed additional specific information in order to further develop their response. Where specifically requested in this way, the project team aimed to issue a substantive response within five working days.

4.2.7 Feedback was processed as follows:

- Letters and paper feedback forms sent to the Freepost address were scanned, filed and the data entered into a database ready for analysis.
- Email submissions were filed and entered into the same database.
- Verbal and phone submissions were recorded on paper forms and entered onto the same database.
- Online feedback forms were exported from the website and imported into the database.

4.2.8 SPEN will continue to review comments in the context of the development of the KTR Project at each stage.

4.3 Approach to analysis

4.3.1 SPEN's approach was to analyse response data and report it in a way that enabled the issues raised to be easily understood.

4.3.2 The third round of consultation focused on the detailed route alignments for the new overhead lines, including potential tower and pole locations, and many responses accordingly focused on very specific local impacts.

4.3.3 Some key themes identified during the third round of consultation were therefore different from those which emerged in the previous, more broadly-focused, rounds of consultation, and are shown in the table below.

Table 4.1 Themes for recording responses to the third round of consultation

Routeing	
Undergrounding	Comments expressing a preference for underground cables instead of overhead lines, either generally or in specific areas
Environmental impact	Comments about the natural and historic environment, including potential impacts on habitats and designated sites
Visual impact	Comments about potential effects on visual amenity
Tourism and property values	Comments about potential impacts on local economic activity such as tourism, and effect on house values
Construction impacts	Comments about the construction process, including potential effects of traffic and transport, noise, dust, installation and removal of temporary accesses, duration of works Comments about land suitability, including current and proposed land use, areas used for recreation, water supply, flooding etc.
Line removal	Comments on the removal of existing lines
Route alignments by Zone	
Route alignments	Comments on route alignments, including preferences for proposed or existing overhead line routes in one or more Zones
Tower and/or pole locations, construction accesses and working areas	Location-specific comments about potential tower and pole positions, construction accesses, working areas or haul routes Comments highlighting environmental and technical factors which are due to be considered by SPEN during the EIA stage
Named local features, wildlife, views, development, to be taken into consideration	Any comments relating to or highlighting specific features or concerns within the local area
Consultation process	
Strategy and delivery	Comments on the consultation process and materials

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

4.4 Quality assurance

4.4.1 At the collation and analysis stage, SPEN carried out a number of quality assurance procedures. A single senior analyst was used to oversee the analysis to ensure consistent application of the methodology.

5 Overview of feedback received in the third round of consultation

5.1 Representations received

5.1.1 During the third round of consultation, respondents were asked to comment on the following:

- The suggested overhead line alignments, including potential tower and pole locations;
- Suggested locations for temporary construction accesses and working areas;
- Removal of existing overhead lines;
- The consultation process; and
- Any other issues, for example areas used for recreation, local environmental features, and any plans for development along the line route.

5.1.2 Three exhibitions were held from 21 to 23 November 2017. A total of 66 visitors were recorded at these public consultation events, as follows:

- New Galloway, 21 November 2017: 33 visitors
- Kirkcudbright, 22 November 2017: 16 visitors
- Mossdale, 23 November 2017: 17 visitors

5.1.3 A total of 57 items of feedback were recorded through different response mechanisms.

Table 5.1 Number of consultation responses by stakeholder group

Stakeholder type	Number of items
Public	50
Statutory	3
Non-statutory	1
Elected representatives	1
Community councils	1
Interest groups	1

Table 5.2 Number of consultation responses by feedback type

Item type	Number received
Hard copy feedback forms	23
Online feedback forms	18
Emails	15
Letters	1

5.2 Responses by stakeholder group

5.2.1 A total of 7 statutory and non-statutory consultees, local interest groups and elected representatives responded formally to the third round of consultation. Responses were received from the following stakeholders:

Statutory consultees:

- Historic Environment Scotland (HES)
- Scottish Environment Protection Agency (SEPA)

Non-statutory consultees:

- Royal Society for the Protection of Birds (RSPB) (Scotland)

Community councils:

- Balmaghie Community Council

Other local interest groups and organisations:

- Dumgal Against Pylons

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

- Finlay Carson MSP

5.3 Presentation of responses

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

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

- Comments on the project overall
- Comments on route alignments by Zone
- Comments on the consultation process

5.3.3 Detailed comments from other stakeholders, such as statutory and non-statutory consultees, elected representatives, community councils and other interest groups are contained in **Appendix A**.

6 Key issues raised by members of the public in the third round of consultation

6.1 Overview

6.1.1 Most respondents commented on specific aspects of the KTR Project, and the issues they raised are captured in the summaries in this chapter. There were more comments relating to Zone C (Glenlee to Tongland) than all other issues combined, and this is reflected in this section of the report.

6.1.2 The comments received have been summarised and grouped according to the following broad themes, as set out in Table 4.1:

- Comments on the project overall:
  - Undergrounding
  - Environmental impact
  - Visual impact
  - Tourism and property values
  - Construction impacts
  - Line removal
- Comments on specific issues, by Zone (A, B and C)
  - Route alignments
  - Locations of towers, poles, construction accesses and working areas
  - Named local features; wildlife; views; development; other local issues
- Comments on the consultation process

6.1.3 SPEN has considered all the comments received, and has responded to them in each section.

6.2 Comments on the project overall

Undergrounding

Summary of comments received

6.2.1 As in previous rounds of consultation on the project, there was considerable support for undergrounding all or part of the overhead line to reduce its visual and environmental impact for the benefit of residents and tourists. Several people referred to the area's unspoilt nature, such as views and habitats, as an important factor in an ambition to maintain and enhance its reputation as a tourist area and potentially achieve National Park status for Galloway Forest Park. The majority of people who commented in favour of undergrounding referred specifically to Zone C, or areas within it. Several specific places along the preferred routes were identified where respondents believed putting the line underground would be most beneficial. These are listed among the comments relating to specific Zones in section 6.3.

6.2.2 There was frustration that SPEN had not included proposals for any undergrounding at the route alignment stage, despite the issue having been raised by respondents in previous rounds of the consultation.

6.2.3 Although there was some recognition that undergrounding would be more expensive than overhead lines, some respondents felt that this additional cost could be readily justified as an investment in the development of the tourism industry on which the local economy depends, and that undergrounding should be the default approach unless there are specific technical and environmental issues that stand in the way. It was felt that the additional costs of undergrounding would be less than the long-term loss of revenue to the tourism industry if pylons were constructed.

6.2.4 There was a suggestion that SPEN should complete a full assessment of undergrounding of the whole project, including any alternatives to SPEN's preferred route alignments.

6.2.5 The Dumgal Against Pylons group said undergrounding should be considered in particular at specific sensitive locations identified by local communities along the routes.

SPEN's response

6.2.6 SPEN's approach to routeing is set out in its published document "Major Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment" which can be viewed under the Project Documents tab of the KTR website at www.spendgsr.co.uk This document underpins the work undertaken to date to develop a proposal for the required reinforcement of the transmission network between Kendoon and Tongland.

6.2.7 On the basis of the detailed routeing work undertaken to date, informed by the previous three rounds of stakeholder consultation, SPEN remains of the view that the use of an overhead line on the selected routes meets the Statutory duties under the Electricity Act 1989 and the transmission licence holder obligations. However, in line with the overall approach, SPEN recognises that routeing the overhead line is an iterative process and will continue to review both the routes and the apparatus used throughout the EIA process stage of the KTR Project.

6.2.8 A fundamental part of the EIA process is the consideration of alternatives. For overhead line projects, this is taken to mean consideration of alternative overhead line routes. Notwithstanding SPEN's published approach to routeing major electrical infrastructure projects, the Scottish Ministers, in their scoping opinion (October 2017) stated that SPEN's EIA Report for the KTR Project should "*include information on alternative measures, including undergrounding, which have been considered to avoid, prevent or reduce and if possible offset the likely significant adverse landscape and visual effects where these have been identified through consultation feedback from affected communities or the routeing process e.g. 'pinch points' or cumulative effects on sensitive receptors.*"

6.2.9 In response to the Scottish Ministers' scoping opinion, and to respond to consultation feedback received from stakeholders and communities affected by the KTR Project, SPEN has commissioned a study of underground options for the areas identified through the three rounds of pre-application consultation. The areas identified for inclusion in this study are as follows:

- Polquhanity to Kendoon
- Queen's Way Crossing
- Bennan, Slogarie and Laurieston Forests
- A75 crossing
- Consideration of undergrounding the proposed Glenlee to Tongland route in its entirety

6.2.10 This study commenced in November 2018 and will run in parallel with SPEN's ongoing EIA of the proposed overhead line route. The conclusions of this study will be considered by SPEN as part of the EIA process. Further information on this study is included in our document "The Kendoon to Tongland Reinforcement Project Underground Cable Study: Our Approach, November 2018", which can be found on the project website www.spendgsr.co.uk.

Environmental impact

Summary of comments received

6.2.11 There were a number of comments relating to the potential environmental impact of siting towers, poles or working areas close to watercourses, wetlands, peat, forestry, woodland, and known wildlife habitats, including some protected species.

6.2.12 Historic Environment Scotland (HES) indicated that routeing of the proposed new overhead lines had taken account of their advice in relation to potential impact on historic sites (see **Appendix A**).

6.2.13 The Scottish Environment Protection Agency (SEPA) and the Royal Society for the Protection of Birds (RSPB) made a number of comments on specific locations or issues, which they asked to be taken into account during the EIA (see **Appendix A**).

SPEN'S response

6.2.14 As set out in 1.3.4 above, our *Schedule 9 Statement* sets out how we will meet the environmental duties placed upon us and can be found on the project website www.spendgsr.co.uk. The statement also refers to the application of best practice methods to assess the environmental impacts of proposals and to identify appropriate mitigation measures. Adherence to our Schedule 9 duties is reflected in our approach to routeing which takes into account landscape, visual, environmental, economic and technical factors to route and design a project which causes, on balance, the least disturbance to people and the environment. You can find out more about this by referring to our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*. Our *Routeing and Consultation Document (October 2016)* explains how we followed this approach in identifying our preferred routes for this project.

6.2.15 In April 2017, SPEN submitted a request to Scottish Ministers for a scoping opinion under the Electricity Works (Scotland) (Environmental Impact Assessment) Regulations 2000. The purpose of the scoping opinion was to provide further detail on those issues with the potential to give rise to significant environmental effects arising from the KTR Project and set out proposed methodologies for undertaking the EIA process. Scottish Ministers adopted a scoping opinion in October 2017 and this was issued to SPEN. The scoping opinion confirmed the scope and the level of detail of the assessments to be undertaken for the KTR Project. The EIA is being undertaken.

6.2.16 SPEN has, in the interim, been working through a detailed 'design freeze' process to identify individual tower and pole locations, construction accesses and working areas. This process has been primarily engineering led but has been informed by the detailed site environmental surveys which have focussed on localised issues including forestry and woodland, watercourses, peatlands, protected species (terrestrial and ornithological) and cultural heritage features.

6.2.17 The majority of comments received referred to specific locations in Zones A, B or C, and/or were raised by statutory consultees, and are addressed in more detail in later sections of this report.

Visual impact

Summary of comments received

6.2.18 Several respondents asked for assurances that new pylons would be painted or coated in grey or another neutral colour to reduce their visual impact, and highlighted the visual impact of "grotesque" unpainted pylons in "bright galvanised metal" recently constructed close to the Galloway Tourist Route north of Kendoon towards Dalmellington.

6.2.19 There were comments that the new pylons would be significantly taller, and therefore much more visually intrusive, than existing ones, and would therefore stand out more prominently in the landscape, and damage the views and unspoilt character of the area.

6.2.20 There was a suggestion that if undergrounding was not possible, lower-height towers should be used to reduce the visual impact, even if this meant more towers than currently proposed because of the lower ground clearance and spacing between them. Another suggestion was to construct two wood pole lines next to each other rather than one pylon line, or consider using a new T-pylon design as being deployed by National Grid on the Hinkley Point C Connection in Somerset.

SPEN's response

6.2.21 As explained in SPEN's Approach to Routeing Document, our overall approach is based on the premise that the major effect of an overhead line is visual. This is as a result of its scale relative to objects in the vicinity such as buildings and trees. There is no technical way of reducing this other than choice of towers, and only limited ways of achieving screening through planting, so the most effective way of causing the least visual disturbance is by careful routeing.

6.2.22 Towers are constructed using galvanised steel which, depending on prevailing weather conditions, will turn a dull grey colour after about 18 months. It is not possible to colour towers to camouflage them for all times of day or all seasons. However, the colour of towers can only be recognised from a short distance. Beyond this, the colour is generally not distinguishable from the backdrop, and appears as grades of light and dark. Where towers are viewed against the sky, colour cannot be relied upon to diminish visibility, since the lighting characteristics of the sky vary greatly. The majority of overhead line components are maintenance free, although periodic painting of towers will be required to prevent corrosion and deterioration of steelwork. The requirement for painting will be identified through regular inspection of towers but is generally required at 15-20 year intervals.

6.2.23 The development of overhead lines will inevitably result in a number of landscape and visual effects which are difficult to avoid. Careful routeing of overhead lines is considered the best way to mitigate these effects. On this basis, overhead line routeing is undertaken by landscape architects using professional judgement, informed by both desk and field work (from publicly accessible locations), reflecting the Holford Rules[2]. The routeing process for the KTR Project has been documented and consulted on via the two Routeing and Consultation documents (published in May 2015 and November 2016 respectively) and through our third round Consultation Document which focussed on route alignments (published in November 2017). These documents can be viewed on our website at www.spendgsr.co.uk

6.2.24 The types of steel lattice tower and conductors (wires) we use for transmission infrastructure projects are described in Chapter 4 of our document Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment which is available on our website www.spendgsr.co.uk. The towers are made from high tensile steel which is assembled using galvanised high tensile steel bolts with nuts and locking devices. We will continue to monitor, and contribute to, developments in the industry and make decisions on where new and appropriate designs might be utilised as part of the development of any major electrical infrastructure proposals. The tower designs we use will be GBSQSS (Great Britain Security and Quality of Supply Standard) compliant and are consistent with those already used across the existing transmission network.

6.2.25 We invest around £7m a year on innovation projects and have a team dedicated to innovation. Investment is spread across a number of areas including network automation, demand-side response, energy storage, smart metering and active network management.

[2] The Holford Rules are accepted guidance for routeing overhead lines in the UK.

6.2.26 The new T-pylon came from a competition organised by National Grid, in which our staff were part of the judging panel. The steel lattice tower is harder to see from a distance, while the T-pylon has a lower profile but is more visible, similar to a wind turbine. The T-pylon also requires a permanent access platform (typically a large concrete base), while we can use mobile removable access for maintenance on traditional towers. This particular type of transmission infrastructure has been designed to carry electricity at voltages of 400kV and was therefore not considered for the 132kV infrastructure proposed as part of the KTR Project

6.2.27 The suggestion to use two wood pole lines instead of steel towers was also made in the second round of consultation. SPEN's position, in line with nationally-recognised Electricity Networks Association Standards, is for any new connection requiring two circuits to be accommodated on steel towers. Towers installed under these standards have continuous earth wires in order to protect against faults caused by lightning strikes, to provide earth potential continuity between substations and incorporate communication and protection functions. Application of these established designs have historically ensured that SPEN's overhead lines are robust and fit for construction, operational and maintenance purposes and provide a reliable connection to the grid.

6.2.28 Any reconfiguration of the circuits, such as a double circuit wood pole section between two sections of towers, would be a non-standard design. Further investigation has identified the following concerns:

- A lower level of network reliability than with a continuous steel tower line;
- Further sterilisation of land (a wider wayleave corridor would be required by introducing either a third wood pole to accommodate an earth wire or underground earth wire);
- Increased costs associated with the installation and maintenance of a separate earth wire and the requirement to install, operate and maintain two separate overhead line routes; and
- Asset renewal at different stages in the lifespan.

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

Tourism and property values

Summary of comments received

6.2.30 A number of respondents raised concerns about the potential impact of the project on the tourism industry and the local economy, and the effect on property prices. These concerns were linked primarily to the long-term visual impact of new, larger pylons in the landscape, and also to the short-term impact of construction work and vehicle movements. Many respondents who expressed concern about tourism impacts also called for undergrounding of the new lines.

6.2.31 Some respondents believed the new overhead lines would "ruin" the "fragile but growing" tourism industry locally, because they would detrimentally affect the unspoilt landscape, wildlife, peace and tranquillity, which are seen as being among the main attractions for tourists.

6.2.32 There were comments that this part of Dumfries and Galloway relies more on tourism than other areas, because its rural nature means it has few employers; therefore any setback to the tourism industry would have a noticeable effect. One respondent said that tourists spend money in local attractions, shops and accommodation, but they would stay away from areas with pylons or major construction works, not just during construction but for many years afterwards; another said that investors would be less likely to back new attractions and create jobs if the landscape was affected by pylons.

6.2.33 Some respondents referred to the removal of overhead lines in England in areas like the Lake District, New Forest, Snowdonia and the Peak District, because of their environmental sensitivity and appeal to tourists, and felt that Dumfries and Galloway should be treated in the same way because of its landscape and potential future national park status.

6.2.34 There were also comments that property prices in the area had stagnated since the announcement of the KTR Project, and that local residents had moved away but were unable to sell their properties because potential buyers were put off by the project.

SPEN'S response

6.2.35 Tourism, recreation and land use such as forestry and farming have been considered as part of the routeing process. This has included the tourist attractions and features which could be affected by visual impact, and which statutory consultees, local interest groups and members of the public have raised in previous rounds of consultation. The environmental impact assessment will focus on potential effects on tourism and recreational receptors within a 5km buffer of the route of the KTR Project where there is likely to be visibility of the development. Where potential receptors are identified as having no potential effects in the landscape and visual assessment or cultural heritage assessment, these will not be considered for effects on tourism within the socio-economic assessment of the EIA Report. Visitor attractions within the study area identified as being within the top five attractions in the area by VisitScotland will also be assessed.

6.2.36 In addition to considering the potential effects on tourist attractions, we will be assessing any potential impacts on tourism businesses as part of the wider socio-economic assessment within the EIA of the final route alignments. A business survey, focusing on tourism businesses with publicly available contact details, was conducted by telephone for businesses within 2km of the route of the KTR Project.

6.2.37 National Parks are considered 'areas of highest environmental value' within SPEN's routeing methodology. There are currently no National Parks within the study area for the KTR Project. Following the first round of consultation, we said that should a new National Park be designated by the Scottish Government within the study area we would consider the implications of this for routeing the project. However, no such designation has been proposed.

Construction impacts

Summary of comments received

6.2.38 Several respondents expressed concern at the increase in heavy vehicle traffic during construction, referring to problems experienced during wind farm construction in the area. These include congestion, road edge erosion and damage to the road surface, particularly on narrow country roads already used daily by timber lorries, and the safety of pedestrians including schoolchildren and elderly people, particularly as many rural routes do not have footways or pavements.

6.2.39 There were requests that existing access tracks should be utilised where possible, including forestry tracks, and that any new tracks should be kept to a minimum number and minimum width, as previous experience suggested there could be applications to retain them for farming purposes following the end of construction. It was suggested that any new tracks should be temporary trackway, which could be removed after use, rather than new stone roads.

6.2.40 Although some respondents described the existing roads as "inadequate" for construction traffic, there were comments that the roads should not be widened as this would affect the rural character of the area and could mean the removal of trees.

6.2.41 There were concerns that noise from construction would ruin the tranquility of the Galloway forest, and would cause distress to wildlife and horses as well as local residents and tourists.

SPEN'S response

6.2.42 SPEN understands the concerns about construction traffic and will be carrying out a full assessment of the potential effects of construction traffic on local communities and road users. The assessment process is explained in more detail in our *Environmental Impact Assessment: Scoping Report, April 2017,* which can be found on the project website www.spendgsr.co.uk.

6.2.43 The health and safety of all road users is paramount. Where potentially significant traffic and transport effects are identified, measures to prevent, reduce and where possible offset these adverse effects will be proposed as part of our EIA Report. The mitigation measures will draw on guidance and best practice, and will be appropriate to the nature and significance of the effect identified.

6.2.44 Possible mitigation measures may include:

- Preparation of a Traffic Management Plan for the construction phase of the scheme;
- The use of approved access routes to site only (including for general construction traffic, abnormal loads, and site personnel as appropriate);
- No parking of construction plant, equipment, and vehicles offsite on public roads;
- Where required, traffic management measures for proposed construction access points with the public road network;
- Direct liaison with local communities to ensure awareness of ongoing works activities and traffic management activities before and during works; and
- Reinstatement of sections of public roads if damaged by construction vehicles

6.2.45 Every effort has been made to use existing accesses to reach tower and pole locations on the proposed route alignment. However, existing tracks may need to be upgraded to accommodate the type of construction vehicles that will be used to construct the KTR Project.

6.2.46 The use of temporary tracks depends on various factors such as topography, underlying ground conditions and the type, size and weight of proposed construction vehicles required to construct tower foundations and erect tower steel work e.g. mobile cranes etc. These factors have been taken into account when identifying the proposed accesses for the Project. In consideration of the above it is expected that stone roads and construction working areas will be required to the majority of tower locations.

6.2.47 The traffic and transport assessment will consider the requirements for the creation of temporary passing places where necessary to facilitate construction and to ensure that health and safety of all road users is safeguarded. Where road widening is proposed this will be identified as part of the traffic and transport assessment. The process for managing temporary passing places will be managed via the Traffic Management Plan in agreement with the local authority.

6.2.48 All temporary tracks will be removed after commissioning, with land being restored to its former condition.

6.2.49 Noise associated with construction of the overhead lines will be temporary, and will quickly diminish as construction progresses, but SPEN will carry out an assessment of the potential effects of construction noise from the project, as set out in Section 11 of our *Environmental Impact Assessment: Scoping Report, April 2017*.

6.2.50 Where potentially significant noise effects are identified, measures to prevent, reduce and where possible offset these adverse effects will be proposed. Possible mitigation measures may include construction environmental management plans and best-practice construction noise control measures including:

- Selecting quiet equipment if reasonably viable.
- Adopting quiet working methods where practical.
- Use of silencers on noise equipment where reasonably practicable.
- Equipment operating intermittently will be shut down in the periods between use.
- All plant and equipment used during construction will comply with the relevant EC / UK noise limits applicable to that equipment and all plant and equipment to be regularly serviced to ensure recommended noise limits are maintained.
- Adherence to set working hours outwith quiet times for noisy equipment and works

6.2.51 SPEN has many years' experience of constructing overhead lines, and is committed to maintaining communication with local residents and communities before, during and after the construction period, to ensure that people affected by the work know what is happening and when, and can contact our Community Liaison Team with any concerns as they arise. Communication can include letters, leaflets and meetings with community councils, community groups and individuals, and should the project receive consent, we propose to continue with the current Community Liaison Group (CLG) to ensure that regular two way communication is maintained between SPEN and communities impacted by the Project.

Line removal

Summary of comments received

6.2.52 The only comments received on the removal of existing overhead lines were related to the route alignments in specific areas, so these issues are addressed in the following sections on Zones A, B and C.

6.3 Comments on route alignments by Zone

Zone A (Polquhanity to Kendoon): route alignments

Summary of comments received

6.3.1 There were comments welcoming the proposed route alignment as an improvement on the existing route, taking the line further away from Dundeugh, and another expressing no concern over the proposed route alignment but indicating a preference for the line to be placed underground.

6.3.2 There was also a comment expressing a strong preference for using the existing route, as the new route alignment would damage forestry habitat for birds and wildlife.

6.3.3 There was a comment opposing a deviation south-west from the existing corridor into the Castlemaddy forestry block, taking the proposed new line close to the FES recreational site at Polmaddy village.

SPEN's response

6.3.4 Given the requirement to maintain the existing overhead line in service until commissioning of the new line, the use of the existing alignment adjacent to the A713 would not be achievable due to proximity of existing properties along the road corridor and at Dundeugh. As well as the technical requirements of the existing transmission network, this decision took into account potential effects on residential amenity, forestry and woodland and cultural heritage features.

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

6.3.6 The ***Polquhanity deviation*** follows a more westerly alignment than the previously preferred route (B), running south-west from the Polquhanity T-in point before entering the coniferous forestry of Galloway Forestry Park. The route passes through an area of recently felled forestry, increasing the distance from new build residential properties west of the A713, and emerges from the forestry to the south-west of Dundeugh, before deviating eastwards and crossing the A713. The deviation then descends towards the river where the existing overhead line crosses the Water of Deugh and passes the southernmost extent of Dundeugh Forest before crossing the Water of Ken to access Kendoon substation. The subsequent removal of N route will remove visibility of towers from the principal views of properties west of the A713 in Dundeugh.

6.3.7 In relation to the potential for undergrounding, please see our earlier response in sections 6.2.8 to 6.2.10.

Zone A (Polquhanity to Kendoon): tower and/or pole locations, construction accesses and working areas

Summary of comments received

6.3.8 No comments were received relating specifically to tower and/or pole locations, construction accesses and working areas in Zone A.

Zone A (Polquhanity to Kendoon): named local features, wildlife, views, development to be taken into consideration

Summary of comments received

6.3.9 RSPB Scotland commented that appropriate mitigation measures must be implemented to minimise potential impact to sensitive species including red data book species such as black grouse, and Annex 1 species nightjar and red kite and other sensitive raptor species. These measures could include planning construction outwith breeding season for these species and/or buffering construction works including access routes from proximity to nest/lek sites.

SPEN'S response

6.3.10 SPEN takes its environmental responsibilities very seriously and has been carrying out an agreed programme of targeted bird surveys, informed by discussions with consultees, throughout the routeing and EIA process. This has identified the presence of a number of bird populations upon which there could be a likely significant effect as a result of the construction and/or operation of the KTR Project.

6.3.11 We will be carrying out an assessment of those likely significant effects as part of our EIA process, which is explained in more detail in our document *The Kendoon to Tongland Project Environmental Impact Assessment: Scoping Report, April 2017*. Any requirement for mitigation following assessment of effects will be discussed with Scottish Natural Heritage and other relevant organisations, including the RSPB and landowners, as the EIA progresses.

6.3.12 In addition to careful siting of infrastructure, SPEN is committed to implementing accepted good practice during construction and operation of the KTR Project, thereby ensuring that many potential effects on ornithology can be avoided or reduced. Such measures are likely to include:

- phased construction in sensitive locations to avoid effects on breeding birds, in particular those listed on Wildlife and Countryside Act 1981;
- engineering solutions to eliminate/ minimise the risk of electrocution to susceptible perching birds (for wood pole connections only); and
- the use of bird deflecting devices on the overhead line during operation in areas used by geese, swans and other identified susceptible species if required.

Zone B (Kendoon to Glenlee): route alignments

Summary of comments received

6.3.13 There were comments in support of the route alignment in Zone B, although a preference for underground cables rather than overhead lines.

SPEN'S response

6.3.14 SPEN welcomes the support for the route alignment in Zone B. Please see sections from 6.2.6-6.2.10 in this report, where we explained our approach to undergrounding in more detail.

Zone B (Kendoon to Glenlee): tower and/or pole locations, construction accesses and working areas

Summary of comments received

6.3.15 There was a concern that the proposed location of Tower 17 could affect a private water supply, and that access to it should not be from a corner on the A712 on road safety grounds.

6.3.16 There was a concern that an additional wood pole might be required on the Carsfad-Kendoon overhead line which could have an adverse effect on the garden at Stonebyres, Kendoon. It was suggested that this could be avoided by moving the line slightly to the north-east.

SPEN's response

6.3.17 SPEN has obtained information from Dumfries & Galloway Council on the location of private water supplies in proximity to the infrastructure of the KTR Project. Further information has also been obtained from the Private Water Supply map on the Drinking Water Quality Regulator for Scotland website[3]. These locations will be visited by the project team to validate the source of the supplies. In the event that there is an effect on private water supplies resulting from construction, appropriate mitigation measures will be put in place to ensure that these are protected. In some instances it may be necessary to provide some properties with alternative supplies.

6.3.18 SPEN has carried out further design work which suggests that an additional pole will not be required immediately east of the watercourse, to the rear of the garden at Stonebyres. It is proposed that this span can be made directly into the existing substation. This will be confirmed following the final pre-construction design and discussed with affected landowners.

6.3.19 There was a comment that views from the B7000 road near Dalry, which is renowned as a scenic route for tourists, could be ruined if new towers are not painted or coated to reduce their visual impact.

SPEN'S response

6.3.20 We try to reduce the visual impact of overhead lines through our approach to routeing. Please see 6.2.22 and 6.2.23 for more information.

Zone B (Kendoon to Glenlee): named local features, wildlife, views, development, to be taken into consideration

Summary of comments received

6.3.21 RSPB Scotland highlighted the presence in Zone B of red kites, an Annex 1 species, and requested appropriate mitigation measures to minimise disturbance.

SPEN'S response

6.3.22 Please see sections 6.3.9 to 6.3.11.

[3] http://dwqr.scot/private-supply/pws-location-map/

Zone C (Glenlee to Tongland): route alignments

Summary of responses received

6.3.23 There were several comments in favour of the route alignment, on the grounds that it appeared to be further from residential properties and care had been taken to protect views.

6.3.24 However, the majority of comments relating to the Zone C route alignment were critical, with many people stating that the alignment should follow the existing route east of Loch Ken, and that not following the existing route would be a breach of the Holford Rules on line routeing; and that the new line should be underground either throughout its length or in particular places, such as where it crosses Loch Ken, and at the Queen's Way, Raiders Road and Stroan Loch.

6.3.25 Several respondents expressed concern about deforestation caused by routeing the line through Laurieston Forest, and the potential for this to scar the landscape for future generations.

6.3.26 Many people said the new line would put off tourists from visiting the area, would negatively affect the area's hopes of becoming a national park, would damage its reputation as a "dark sky" park, and would drive away local horse-riders and dog-walkers.

6.3.27 General comments about undergrounding, environmental impact, tourism impact and construction impact, made under the heading of Zone C but without specific geographic references, have been addressed in Section 6.2 of this report.

SPEN'S response

6.3.28 A corridor which follows the route of the existing overhead line east of Loch Ken was identified and appraised as corridor G/T 4 during the first round of consultation in 2015. G/T 4 was not progressed by SPEN as the preferred corridor on the basis: 1) of the potential for collision risk impacts on the qualifying bird species of the Ramsar/SPA; 2) that landscapes have lower capacity to accommodate the new overhead line; 3) of the potential for visual impacts on a number of key viewpoints (including tourist routes) around Loch Ken; and 4) the relatively higher density of residential properties.

6.3.29 Following feedback received in the second round of consultation, SPEN identified and appraised a route option which followed, wherever possible, the existing overhead line east of Loch Ken. The appraisal found that this route would not perform better than SPEN's preferred route, due primarily to the impact on the qualifying interests and notified features of the Loch Ken and River Dee Marshes Ramsar, SPA and SSSI, and potential visual amenity effects on properties and views in the Ken valley. Furthermore, our proposed route will enable SPEN to remove the existing line, which will be an improvement to the designated sites. You can find more detail on this in our *Summary of Feedback from Second Round of Consultation, March 2017*.

6.3.30 As explained in 6.2.37, following the first round of consultation, we said that should a new National Park be designated by the Scottish Government within the study area (prior to a decision on the applications for section37 consent/deemed planning permission) we would consider the implications of this for routeing the project. However, no such designation has been proposed.

Zone C (Glenlee to Tongland): Tower and/or pole locations, construction accesses and working areas

6.3.31 Tower numbers 5 to 11: There was a comment that these are close to an important footpath, and that mitigation should include clear waymarks at all turning points along the path and kissing gates where necessary.

SPEN'S response

6.3.32 Mitigation suggestions have been noted and will be pursued with the landowner with a view to reaching agreement. During construction any closures or diversions to existing footpaths and public rights of way will be clearly signposted.

6.3.33 Tower numbers 4 to 9: There was a comment that the route from just south of Bucks Linn Bridge up to the crossing of the Queens Way should be further west, in particular where close to Airie and the footpath/track to the road to Glenlee. This would be scenically better and impact less on the public right of way and Airie.

SPEN'S response

6.3.34 Routeing in this area had to take into account several issues including existing fishing ponds and forestry. The route alignment was altered to maintain 30m distance from fishing ponds and 40m from existing forestry to comply with statutory safety clearance distances. As noted above, mitigation in relation to the right of way will be discussed and agreed with the landowner.

6.3.35 Tower 9: There was a comment that the proposed location for the tower west of Airie Cottage should be moved further west into the adjacent field, as far back from the cottage as possible.

SPEN'S response

6.3.36 Following discussions with landowner the alignment has been moved slightly west on to lower ground.

6.3.37 Tower 11: There was a comment that the tower location should be moved to the west to be in a straight line between 10 and 13.

6.3.38 Queen's Way crossing area (towers 10 to 17): There was a comment that the route now takes a dogleg apparently to avoid Darsalloch house which means more of the National Forest Estate (NFE) is affected.

SPEN'S response

6.3.39 The position of towers through this section of Zone C (Glenlee-Tongland) has been amended since the previous round of consultation. This was in response to concerns raised in relation to angling interests for a number of small ponds situated between the Queen's Way (A712) and Knocknairling Burn. In order to achieve sufficient minimum safety clearance distances from these ponds, the alignment has been amended between towers 10 and 14. This has resulted in the relocation west of tower 11 from the original position with a new tower (tower 12) required immediately north of the Queen's Way. This alignment achieves the best balance between maximising distance from existing property at Darsalloch and properties to the east, including minimising impacts on recently planted woodland at Airie.

6.3.40 Towers 20-26: There was a comment that, assuming very small angle bends in the overhead line would not add substantial load to pylons, if the line was moved approx 200m west, additional (blue) access paths would be shorter.

SPEN'S response

6.3.41 The alignment in this section has been routed to utilise existing topography whilst keeping the overhead line as low in the landscape as possible. The alignment was also selected to minimise potential impacts on existing forestry as well as future forest management and operations. SPEN is continuing to engage with landowners to meet this aim.

6.3.42 Towers 32-35: There was a comment that a slight realignment 100m south-west to lower slopes might help hide the overhead line.

SPEN'S response

6.3.43 The alignment in this section has been routed to utilise existing topography whilst keeping the overhead line as low in the landscape as possible. The alignment was also selected to minimise potential impacts on existing forestry as well as future forest management and operations. SPEN is continuing to engage with landowners to meet this aim.

6.3.44 Towers 43-45: There was a suggestion to realign this section approximately 50 metres west, onto slightly lower ground north of Ross hill, and also construction of a core path from the Tower 45 access route to Stroan Loch (cutting off horse shoe along Raiders Road) as a public benefit.

SPEN'S response

6.3.45 The route alignment in this area has been selected to find the best balance between existing topography and maintaining existing continuous forest cover to the east and north of Ross Hill. Following consideration of consultation feedback and further discussions with landowners, SPEN is no longer proposing to use the Raiders Road as a construction access. The updated accesses to this location are shown in **Figure 6.1.15** in **Appendix E**.

6.3.46 Tower 47: There was a comment that the location of this tower, and access using the former railway line to the towers near Stroan Loch, would affect views over the Loch and discourage visitors who walk along the old railway line.

SPEN'S response

6.3.47 In selecting the route and access track alignment, our general aim has been to cross these at perpendicular angles, wherever possible. This is intended to avoid paralleling existing paths which would increase the visual effects. In regards to the core path along the former Gatehouse of Fleet railway line, the access has been amended so that no construction vehicles will travel along it (see **Figure 6.1.15** in **Appendix E**). However, a crossing point will still be required south of tower 46 to reach the proposed towers (towers 47, 48 and 49) south towards the River Dee/Black Water of Dee. SPEN will work to ensure that this path remains open during the course of the works.

6.3.48 Towers 50-57: There was a suggestion that access towards Airie Farm should be via the old railway and Stroan viaduct rather than using the very narrow road through Slogarie and then the old road to Airie farm (now a core path in very poor condition as a road), and that temporary trackway should be used to ensure no future evidence of construction activity. It was also suggested that SPEN should liaise with FCS over access to Slogarie forest, where new access tracks are being planned for future timber removal, and that SPEN should work with FCS to create new waymarked core cycle and footpaths linking Lochenbreck with the old railway line as a community benefit, as well as waymarking the current Airie to Slogarie core path.

SPEN'S response

6.3.49 Following this feedback, SPEN has identified an alternative access to this area from the south (see **Figure 6.1.17**). In regards to establishment of new 'waymarked' trails, should the KTR Project receive consent, SPEN is committed to exploring potential 'green networks' opportunities in partnership with communities and landowners throughout the KTR Project area. Potential schemes under this initiative would be community led and might include the creation of core cycle/walking paths and habitat creation in the vicinity of the Project. Discussions with communities on such proposals, including how and when to consult on them, would only take place if the KTR Project is consented. However SPEN will outline its strategy for consulting and delivering on these proposals within the EIA Report. SPEN would suggest that the established Community Liaison Group (CLG) would be the likely starting point for such discussions.

6.3.50 There was a suggestion that the route should avoid Slogarie completely to avoid potential impact on the future development of Slogarie Farm, and that the proposed 'Slogarie Deviation' would not solve the problem.

SPEN'S response

6.3.51 The Slogarie Deviation was identified following feedback to the second round of consultation from local residents and community groups, and offers the potential to reduce visibility of the overhead line from residential properties and other key viewpoints without compromising the biodiversity (ornithological) constraints to the west. The Slogarie Deviation was incorporated into the route following detailed appraisal, the findings of which were published in *Summary of Feedback from Second Round of Consultation, Appendix U*. This decision also took into account feedback and discussions with landowners in this area.

6.3.52 Towers 52-58: There was a comment that to route the overhead line 'just' inside the forest would leave a narrow swathe of forest along the edge of the forested area, which would be more likely to suffer wind damage.

SPEN'S response

6.3.53 The alignment through this section was designed to utilise the lower eastern slopes of Bennan and Slogarie Hills to 'backcloth' the overhead line to reduce views and perceptibility of the overhead line from a wider area whilst moving the alignment further away from residential properties within the Slogarie Estate. Given the age of the current crop and general soil stability of this area it is likely that this section would be lost to windthrow. However, the possibility of future planting of woodland in this area on a long-term retention to partially screen and filter views of the overhead line may be possible, subject to landowner agreement.

6.3.54 Towers 59-61: There was a suggestion to realign this section 100m-200m west, to keep tower locations just in the forest and minimise impact on Slogarie farm land.

SPEN'S response

6.3.55 Moving towers 59, 60 and 61 would require movement of this section of overhead line back to tower 54. This would lead to tower 54 becoming a heavier (more prominent angle) on elevated ground on the shoulder of Bennan Hill with this route section being located on higher ground. This would also lead to further effects on future forest management operations in this area.

6.3.56 Towers 63-65: there was a comment that a slight repositioning northwards should help reduce extra trackway required.

SPEN'S response

6.3.57 Following feedback from the consultation and subsequent landowner discussions this access has been altered (see **Figures 6.1.18 and 6.1.19**)

6.3.58 Towers 66-68: There was a comment that the forest track shown parallel to and just north of Kennick burn no longer exists (over 700m or so) and should not be rebuilt as the land has returned to peat wetland and new forestry has not been planted. Access must be from the east to west track higher up Kennick Hill.

SPEN'S response

6.3.59 Following feedback from the consultation and subsequent landowner discussions this access has been altered (see **Figure 6.1.19**).

6.3.60 Kennick Burn: There was a comment that the point at which the overhead line would cross the C13 at Kennick Burn would have a negative impact on tourism, discouraging visitors from returning to the area, and the planned access roads would cause immense disruption, in particular to Laurieston village and the C13. The road is winding and steep, and popular with dog walkers, and inappropriate for use as an access road for construction traffic. If the road is widened at any point it could cause severe damage to the beeches which are a feature of this area.

SPEN response

6.3.61 This section of the overhead line has been routed to minimise impacts on existing broadleaf woodland (beech trees), the picnic area at Kennick Burn, and the popular paths in the area with the aim of crossing the C13 Laurieston to Gatehouse of Fleet road to avoid long views of the line by road users. SPEN's approach to considering tourism, recreation and traffic and transport impacts are addressed in sections 6.2.35 – 6.2.36 and 6.2.42 – 6.2.48 respectively.

6.3.62 Tower 68: There was a comment that no tower should be placed in this location, and that it might be possible to avoid doing so by re-spacing towers 63-70 and perhaps putting in an extra tower abutting the Gatehouse road. There was a further comment that there should be no access from the eastern section of path (east of the bog), as the area is relatively unspoilt and there are multiple well used waymarked walks which should not be used for heavy traffic. Access could be taken from a path higher up Kennick Hill.

SPEN response

6.3.63 Following feedback from the consultation and subsequent landowner discussions this access has been altered (see **Figure 6.1.19**). In regards to the location of tower 68 and re-spacing of spans between towers 63 and 70, consideration will be given to further micro-siting following final ground investigation works at the pre-construction stage.

6.3.64 Towers 69-73: there was a suggestion that repositioning might enable shorter stretches of new pathway.

SPEN response

6.3.65 Following feedback from the consultation and subsequent landowner discussions this access has been altered (see **Figures 6.1.19 and 6.1.20**).

6.3.66 Towers 74 to 76: A respondent asked if tower 74 will be in the trees, and will 75 and 76 be visible from a neighbouring property?

SPEN response

6.3.67 Tower 74 will be located just inside the current forest boundary within the forest estate, whilst towers 75 and 76 will be located in open ground to the east. The three towers will be visible in views from the residential property Edgarton Cothouse to the south-west of the overhead line. The property affords open and panoramic principal views towards the Solway Firth to the south. Towers 74 – 76 will appear in views from the north façade of the property and curtilage, at distances of between 415m (Tower 74) and 620m (Tower 76). The towers will appear partially backclothed (Tower 74) against coniferous woodland or partially screened by intervening landform (Towers 75 and 76), reducing the prominence of the towers in views from the property.

6.3.68 Towers 82 and 83: A respondent asked if it would be possible to access the tower locations using a 'floating' roll-out road (trackway) across the bog as a 'less aggressive' solution than creating a new access way around the boggy area.

SPEN response

6.3.69 This access was included due to the potential requirement to avoid very wet ground in the vicinity of towers 82, 83 and 84. Subsequent site visits by the construction team have identified that direct access may be possible, however this will be dependent on the weather and ground conditions at the time of construction. For this reason the access as shown is still required. However a secondary, direct access has been incorporated and will be the preferred access between these towers, subject to site assessment prior to construction. Use of temporary trackway for a direct access between these towers would not be possible due to underlying ground conditions.

6.3.70 There was a suggestion that the majority of 'blue' tracks shown, including all short stretches, should be temporary 'rollout' road surfaces (trackway). There was a further suggestion that where improvement is required on the existing 'red' forestry tracks, where possible this should be through excavating existing hard-core to remove soil and organic matter and re-laying the hard-core; the reuse of existing forestry road materials will aid lowering the number of lorry journeys into the site, and the total carbon footprint of the project.

SPEN response

6.3.71 The type of access required for each tower location will vary, depending on local factors such as topography, ground conditions and the size and weight of construction vehicles required, as outlined in paragraphs 6.2.41 to 6.2.50 of this report.

Zone C (Glenlee to Tongland): named local features, wildlife, views, development, to be taken into consideration

Summary of comments received

6.3.72 RSPB Scotland expressed concerns about potential impact to Annex 1 species nightjar and sensitive raptor species, advising that the section between towers 31 and 44 should be undergrounded to avoid disturbance to a high risk zone for nightjar territories. If an overhead line is consented on this section, appropriate mitigation measures should be implemented to minimise the impact to nightjar through collision risk. This would include suitable mitigation measures for construction (avoiding breeding season) or by providing suitable buffer distances between construction works and nesting territories and through mitigation measures such as line marking to reduce collision risk. We understand that the results of focused survey effort in this area will inform design layout and we advise that this detail should be included in the EIA.

6.3.73 SPEN'S response: Please see 6.3.10 to 6.3.12.

6.3.74 There was a concern that other endangered species such as red squirrels, pine martens, otters, badgers bats and small mammals, as well as amphibians and reptiles, may also be adversely affected by disturbance. The Mossdale railway track is one of the few places in the region where butterfly numbers are relatively good as they are distant from the effects of spraying from farms. The same will be true for many of our very special bees and insects, and amongst the forest glades, there are huge numbers of sensitive and rare plants.

6.3.75 SPEN's response: Desk based research and field surveys have been undertaken to establish the presence of, and potential for adverse effects on, red squirrels, pine marten, otters, badgers, bats and great crested newts. Detailed habitat mapping has also been undertaken. Specific surveys for reptiles have not been undertaken but in areas where these are likely to be present, standard mitigation measures can be put in place during the construction works to avoid significant effects on these species. The presence of invertebrates is noted and good construction and environmental management practices will seek to ensure that any significant effects on these species are avoided.

6.4 Comments on the consultation process and materials

Summary of comments received

6.4.1 There were a number of positive comments about the consultation process, events and materials, as well as a number of critical comments.

6.4.2 Positive comments included praise for the drop-in events, including the pre-event advertising and publicity, the availability of experts, their courteous approach and ability to provide intelligent and detailed clarification on a range of issues. The events were described by one respondent as "a welcome addition to the process" and others felt they were listened to. The 3D visualisations were found very useful.

6.4.3 The consultation process was described as thorough, open, well-presented and well-advertised, and that SPEN seemed to have a genuine interest in engaging with stakeholders.

6.4.4 Critical comments included a belief that the consultation was "a box-ticking exercise", and a waste of time and money as SPEN would not listen to comments received. One respondent felt that drop-in events had been poorly publicised and another felt the events allowed "obsessive little self-interest groups to gain more influence than they deserve."

6.4.5 Some respondents felt that the consultation was flawed because materials and events provided insufficient detail on tower heights, construction accesses and haulage routes.

SPEN's response

6.4.6 The overall objective of our consultation is to ensure that all parties with an interest in the KTR Project continue to have access to up-to-date information, and clear and easy ways in which to shape and inform our proposals at the pre-application stage.

6.4.7 Our consultation strategy for the third round of consultation took account of feedback submitted by stakeholders and communities during the first and second rounds of consultation, and was shared with statutory stakeholders in advance. The strategy and process were explained in section 4 of *The KTR Project: Consultation Round Three: Consultation Document, October 2017*. Full details of how the consultation was carried out can be found in section 3 of this report.

6.4.8 3D visualisations were available at all of our drop-in consultation events, so that people could see how towers might look in the landscape when viewed from particular properties or viewpoints. Project team members were available at all events to discuss potential construction accesses and haulage routes, and we have acted on many suggestions for improvements, as explained earlier in this report.

6.4.9 The views of local people and stakeholders are very important to us, and have informed development of the project at each stage. We will consider all representations received during this consultation when preparing our applications to the Scottish Government for section 37 consent. After applications are made, the Scottish Government will conduct an additional formal statutory consultation process during which people will be encouraged to make comments directly the decision-making authority.

7 SPEN's conclusions following the second round of consultation

7.1 Overview

7.1.1 SPEN has reviewed and considered in detail all feedback received from the public, consultee bodies and local interest groups in relation to the third round of consultation.

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

- The views of respondents on the project as a whole, including the routeing methodology;
- The views of respondents on the route alignments, tower and pole locations, construction accesses and working areas proposed by SPEN;
- Information on the local area, including areas used for recreation, local environmental features, and any existing plans for new developments within the preferred routes; and
- Views on how the rounds of consultation have been conducted.

This section outlines the conclusions on the feedback received and explains the next steps.

7.2 Conclusions

7.2.1 As a result of the third round of consultation and in direct response to comments made by members of the community, a number of changes have been made to the design of the KTR Project. These include:

- Moving tower 9 further west of Airie Cottage and on to lower ground;
- Alteration of alignment across the Queens Way to maintain 30m distance from fishing ponds and 40m from existing forestry to comply with statutory safety clearance distances;
- Alteration to the locations of a number of towers to reduce the amount of new access track required in the area around Slogarie and within Laurieston Forest.

7.2.2 Whilst a number of further suggestions were made throughout the public consultation process, it has not been possible to accommodate all of the suggested changes. In reaching the detailed 'design freeze' for the KTR Project it has been necessary to balance the consultation feedback from both local communities, individuals and landowners against the engineering requirements and the findings of the detailed site environmental surveys which have focussed on localised issues including forestry and woodland, watercourses, peatlands, protected species (terrestrial and ornithological) and cultural heritage features. As stated in 6.2.16, the outputs of the detailed 'design freeze' of the KTR Project will now be subject to EIA.

7.3 Next steps

7.3.1 SPEN has considered all representations received and completed our 'design freeze' of tower and pole locations and construction accesses. Discussions are also ongoing with landowners in regards to identifying construction compounds and quarry locations which SPEN also intend to include in the EIA and applications to Scottish Ministers for section 37 and deemed planning consent.

7.3.2 SPEN will now carry out an EIA. Our EIA Report will be submitted to the Scottish Government along with our Section 37 consent applications for the project. The EIA will also consider the conclusions of the ongoing undergrounding study.

7.3.3 After applications are made, the Scottish Government will, on behalf of Scottish Ministers, conduct an additional formal statutory consultation process during which people will be encouraged to make comments directly to the Government.