T ROUTE REBUILD PROJECT

CONSULTATION FEEDBACK REPORT

NOVEMBER 2022

SP TRANSMISSION PLC

1. NTRODUCTION

Background

1.1. Due to the age of the existing overhead line, SP Transmission plc needs to rebuild approximately 13.5km of the existing 132kV steel tower connection (known as 'T Route'), which extends between 'AK Route' north of Annan to the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south-east of Gretna.

1.2. There are three main elements to the project:

- Construction of 13.5km of new wood pole overhead line using mainly single wood pole supports of the Trident design;
- Dismantling and removal of a section of 13.5km of existing steel lattice tower line; and
- Construction of a new terminal steel lattice tower near Annan and two new towers near Gretna.

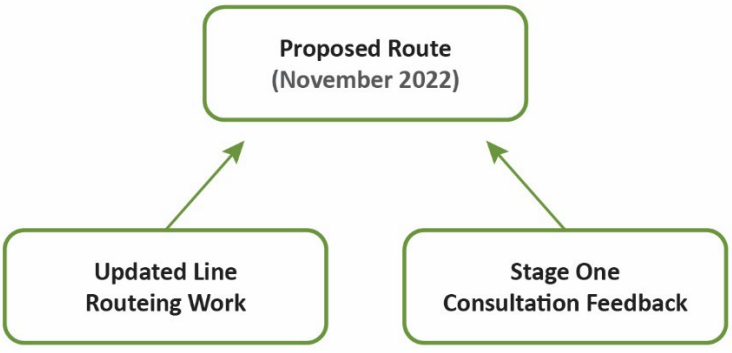
1.3. Together these elements are referred to as the T Route Rebuild Project.

1.4. Following the design development process, SP Transmission plc will apply to Scottish Ministers for consent for the T Route Rebuild Project. This is for consent to install and keep installed the overhead electricity line. SP Transmission plc will also apply for deemed planning permission for the line and associated works, under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 ('the 1997 Act').

Purpose of the Report

1.5. Having presented the preferred route at the start of the Stage One Consultation, the purpose of this report is to show how SP Transmission plc has reviewed the design and established the 100m wide proposed route following consideration of:

- Ongoing technical line design by SP Transmission plc's engineers; and
- Feedback from the Stage One Consultation.



1.6. The proposed route is the subject of the Stage Two Consultation.

1.7. The report is set out as follows:

- Section 1 - Introduction
- Section 2 - Technical Review of Preferred Route
- Section 3 - Stage One Consultation Process and Feedback
- Section 4 – Revised Project Proposal
- Conclusions and Next Steps

SP Transmission plc's Approach to Consultation

1.8. In Scotland, there is no formal pre-application requirement for consultation in seeking section 37 consent/ deemed planning permission. However, SP Transmission plc attaches great importance to early engagement in advance of such applications being made (the pre-application stage). This is to ensure that all parties with an interest in the T Route Rebuild Project continue to have access to current information and are able to shape and inform the proposals as they develop during the pre-application stage. It also provides consultees with an early understanding of the likely programme for the application, which will help ensure that they are able to engage effectively and in a timely manner as the project progresses.

1.9. By building on this stakeholder engagement, SP Transmission plc ensures that individual relationships with relevant local authorities and statutory consultees remain strong by maintaining good lines of communication. This is an ongoing process which influences and shapes the company's approach to the project and to consultation.

1.10. SP Transmission plc's approach to stakeholder engagement for major electrical infrastructure projects is outlined in section 2.3 of their document '*The Approach to Routeing and Environmental Impact Assessment*'[1]. This document sets out the following four key stages in the consultation process:

Pre-project notification and engagement

⇩

Information gathering

⇩

Obtaining feedback on emerging route options

⇩

The Environmental Impact Assessment (EIA) Stage

Pre-project Notification and Engagement

1.11. Early and proactive engagement enables the views of consenting bodies, planning authorities, and statutory consultees to inform project design, and both their advice on routeing and

[1] Scottish Power Energy Networks (2015) Approach to Routeing and Environmental Impact Assessment

assessment methodologies and their suggestions for engaging with other interested parties and local communities to be taken into account. It also provides consultees with an early understanding of the likely programme to submission of the application for consent, which assists in ensuring that they are able to engage effectively and in a timely manner as the project progresses.

Information Gathering

1.12. To inform the routeing stage, information on relevant environmental and planning considerations within the project study area is requested from statutory consultees and other relevant organisations such as the Royal Society for the Protection of Birds and local Wildlife Trusts. In conjunction with this, or in parallel, consultation may be undertaken to gather feedback on proposed data gathering techniques (such as seasonal bird surveys) for comparing route options.

Obtaining Feedback on Emerging Route Options (this stage)

1.13. Different methods are used to gather feedback on emerging project details, depending on the size and characteristics of the project. This often includes discussion of any alternative routes which are being considered. For larger projects such as this, these alternatives are set out in SP Transmission plc's '*T-Route Rebuild Routeing and Consultation Document*[2]' which is issued to statutory consultees and made available on SP Transmission plc's website. Its availability to the public is advertised in the press.

1.14. Local exhibition(s) and/or public meetings may also be arranged, with supporting flyers/ leaflets and/ or feedback forms to aid people's understanding of the project in order to get feedback on the routeing process. Where face to face events are not possible, SP Transmission plc looks to virtual methods of informing consultation and gathering feedback from stakeholders such as project specific websites to host virtual consultations to share relevant information. SP Transmission plc's approach to consulting on major electrical infrastructure projects is to consult on a series of route options clearly indicating a preferred route, setting out the reasons for the other route options being discarded. These consultations are aimed at everyone with a potential interest, including key stakeholders involved in the planning process, communities and landowners.

1.15. For this project, although the covid regulations no longer apply, SP Transmission plc are not holding an in-person event. This is because during the first stage of consultation only four feedback responses were received from members of the public within the local community and the Community Councils did not express a wish to engage in an online live discussion. Over 200 properties were also letter dropped and the consultation was promoted in the local press. Due to the very limited response received, the company consider that an in-person event is not necessary.

The EIA Stage

1.16. The results of stakeholder engagement are taken into consideration and used to confirm the 'proposed route' for progression to EIA.

1.17. The main purpose of the EIA is to identify the significant effects arising from a project. Further consultation is carried out during the EIA stage, including additional information gathering, and the preparation of a publicly available Scoping Report which accompanies a 'Request for a Scoping Opinion' to the consenting authority as to the information to be provided in the EIA Report/ Environmental Statement (ES), including the proposed assessment methodologies. Feedback received at this stage also informs the development of appropriate mitigation

[2] Scottish Power Energy Networks (June 2022) T Route Rebuild Project Routeing and Consultation Document

strategies as the EIA process is progressed. Reference is made to any relevant legislation, industry standards and good practice guidance. Further public engagement is also undertaken as necessary and in accordance with EIA good practice. In accordance with the relevant consenting requirements in Scotland, England and Wales, the EIA Report/ ES is consulted upon by the determining authority as an accompanying document to the application for consent.

2. STAGE ONE CONSULTATION - PROCESS AND FEEDBACK

Background

2.1. The Stage One Consultation ran for 30 days between the 11 July and the 9 August 2022. The consultation was carried out virtually in accordance with the Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations April 2020 (with amendments in 2022), covering pre-application consultations for public events.

2.2. The following project website was set up for the T route Rebuild Project:

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

2.3. In accordance with the pre-project notification and engagement, and information gathering stages, SP Transmission plc engaged with statutory and non-statutory consultees at an early stage in the development of the project. Due to the proximity of the T Route Rebuild Project to the English border south of Gretna, English statutory and non-statutory consultees were also consulted as there may be potential for some effects within these authority areas.

2.4. Statutory stakeholders include:

Allerdale Borough Council	Historic England
Carlisle City Council	Historic Environment Scotland
Cumbria County Council	Natural England
Dumfries and Galloway Council	NatureScot
Eden District Council	Scottish Environment Protection Agency (SEPA)
Environment Agency	Scottish Government ECU

2.5. A full list of all statutory and non-statutory consultees and a copy of the email and plan sent to them on 11th July 2022 can be found at Appendix A.

2.6. The preferred route shown in Figure 1 was presented and information on relevant environmental and planning considerations within the routeing study area was requested from these consultees. At the same time, consultations were carried out to gather feedback on proposed data gathering techniques (such as seasonal bird surveys).

Stage One Consultation

2.7. Prior to the consultation starting, to ensure all residents and stakeholders potentially affected by the proposals were consulted, SP Transmission plc defined a consultation zone for the purposes of a leaflet drop in June 2022, prior to the Stage One Consultation. This zone is shown in Figure 2. It includes all residential and business addresses within 200m either side of the existing T Route to be dismantled and properties within 200m of the preferred route.

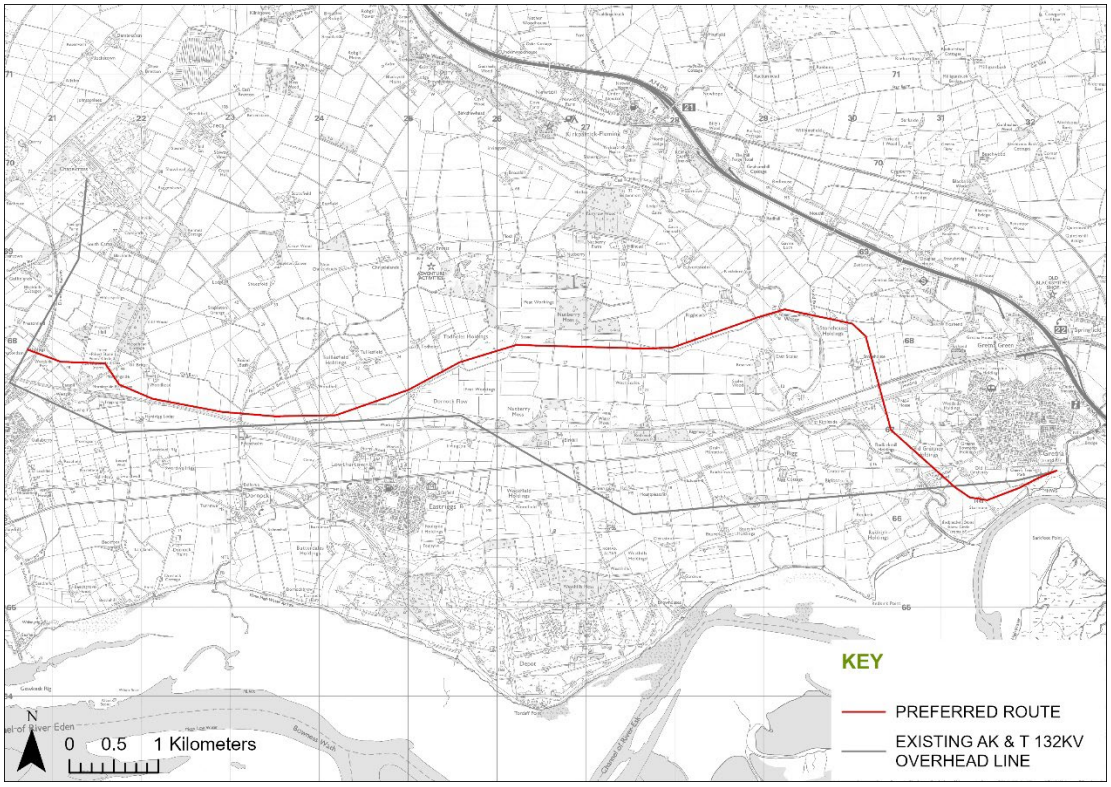


Figure 1: The Preferred Route

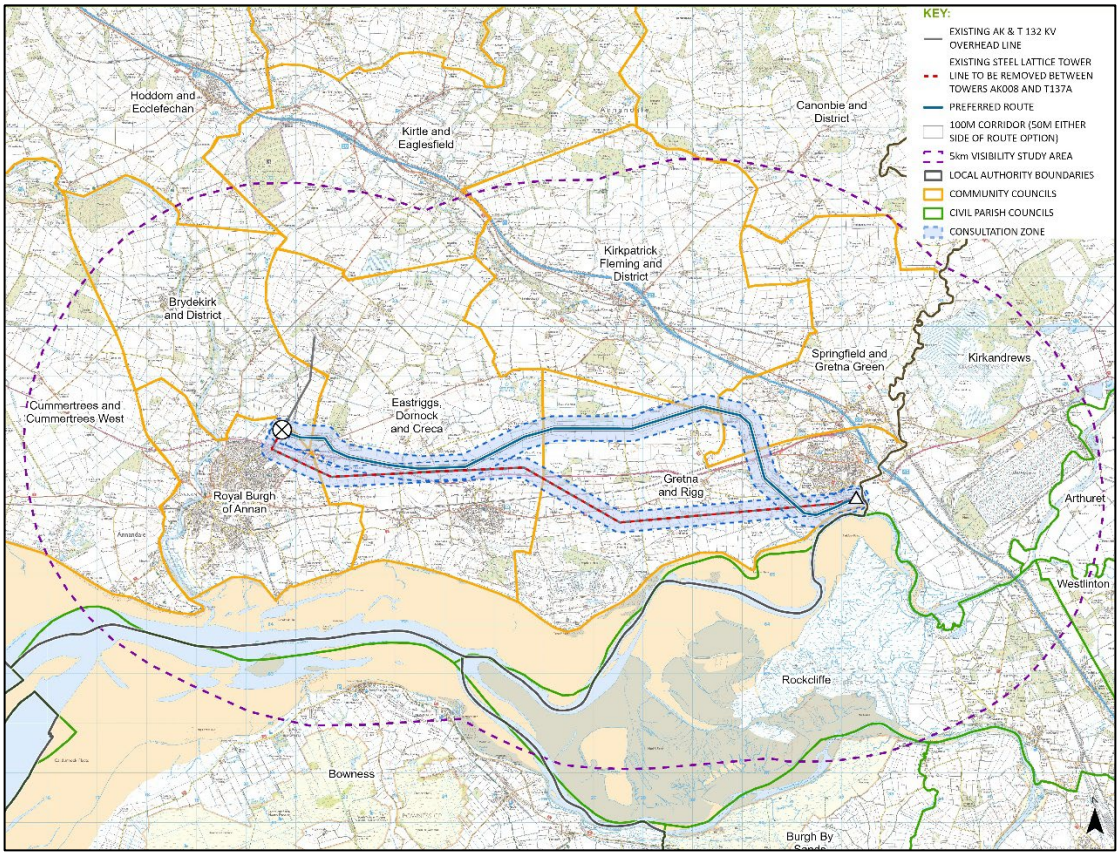


Figure 2: Consultation Zone for Leaflet Drop

2.8. Using OS AddressBase Core® data, a total of 279 addresses were sent a copy of the Consultation Information Leaflet summarising, raising awareness of the public consultation and inviting participation. A copy of the leaflet is included at Appendix B.

2.9. All community and parish councils located within the 5km of the preferred route were contacted to see if they could assist with advertising the consultation. The email sent out is included at Appendix B. The following community/ parish councils agreed to assist the consultation by displaying a printed consultation information poster on local community notice boards:

Community Councils – Dumfries and Galloway	Town and Parish Councils - Cumbria
Royal Burgh of Annan;	Rockcliffe Civil Parish;
Gretna and Rigg;	Kirkandrews-on-Esk Civil Parish; and
Springfield and Gretna Green;	Westlinton Civil Parish.
Kirkpatrick Fleming and District;	
Hoddom and Ecclefechan; and	
Canonbie and District	

2.10. In addition to the leaflet drop to residences, on 19 May 2022, a consultation letter was also sent to affected landowners informing them of the preferred route and the Stage One Consultation process. A copy of this letter is included at Appendix B.

Advertising

2.11. Prior to the consultation, adverts appeared in local weekly newspapers. These newspapers included:

Publication	
Annandale Observer (week beginning 4 July 2022)	Dumfries and Galloway Online (week beginning 4 July 2022)
Copy of Newspaper Advert	
T Route Rebuild Project - Public Consultation **New wood pole overhead line between Annan and Gretna and removal of existing steel tower line 007Akko** SP Transmission plc are consulting on a proposed 132 kilovolt overhead line, supported on wood poles, which will replace the existing steel tower line between Annan and Gretna in Dumfries & Galloway, on a different route.	Comments can be sent to the main project mailbox at: TRoute@spenergynetworks.co.uk Or in writing to: TRoute@spenergynetworks.co.uk

The consultation will run for 30 days between 11th July and 9th August. The project information will remain accessible online and available for download beyond this period. Due to current restrictions relating to Covid-19 no public event is proposed. Instead, the project information can be found online here: https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx	T Route Rebuild Project, Land and Planning Team, SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA Please note - Comments at this stage are informal and are made to allow SPEN to determine whether changes to the route are necessary. An opportunity to comment formally to the Energy Consents Unit will follow at a later stage in the process following consultation by the Scottish Government once the application is submitted to them.

Scope of the Consultation

2.12. The scope of the first stage of pre-application consultation was to invite statutory and non-statutory consultees, the public and local communities to comment on the following:

- The preferred route for the connection;
- Any of the alternative route options considered during the routeing process; and
- Any other issues, suggestions or feedback for SPEN to consider.

2.13. The work and documents published on the project website as part of the Stage One Consultation are listed below:

Stage One Consultation Documents Published on Project Website
A Routeing and Consultation Document - describing the project (including the need case) and the work undertaken in arriving at the preferred route, including the identification and comparative appraisal of several 100m wide route options based on a series of environmental, technical and economic considerations, together with the reasons for the selecting the preferred route.
A leaflet – setting out frequently asked questions. A copy of the leaflet is included at Appendix B.
Presentation boards – providing more information on the need for the project, the route selection and appraisal process and explaining how people can provide feedback or raise concerns about the project. A copy of the boards is included at Appendix C.
A poster - with assistance from local community councils in Dumfries and Galloway and parish councils in Cumbria explaining the project and the consultation was displayed on public notice boards with a news release displayed on community/ parish council social media pages and also on the ScottishPower Twitter and Facebook sites. A copy of the poster is included at Appendix D.

2.14. Community and Parish Councils and planning committees were emailed on the first day of consultation, to invite them to visit the website and provide any feedback. Community Councils were offered the opportunity to participate in a live online discussion. The emails are shown in Appendix E.

Summary of Feedback

2.15. There were four written comments received from members of the public of which two related to concerns about the scheme.

2.16. Comments were also received from NatureScot, Natural England, Historic Environment Scotland, the Galloways Fisheries Trust, Dumfries and Galloway Council, Transport Scotland, Scottish Forestry, Network Rail, British Telecom and the Coal Authority.

2.17. The full list of responses is provided at Appendix F.

2.18. Most of the comments relate to concerns about impacts on the environment.

Environment

2.19. Statutory consultees raised concerns about potential impacts on the designated sites associated with the Solway Firth but noted that these could be avoided through careful design and the implementation of appropriate construction techniques and timing of the works. The comments also acknowledged that preferred route avoids the Solway Firth Goose Management scheme and that woodland had been avoided wherever possible.

2.20. Other comments from statutory consultees related to archaeological and historic assets and the need to protect both designated and undesignated sites and their setting. The Battle of Sark Inventory battlefield was of particular concern, although it was recognised that the replacement of towers by a wood pole overhead line would be a small improvement in terms of the setting of the battlefield.

2.21. Concerns were also raised about the potential impact of construction activities on water quality, habitats, and fish populations and the need to ensure that adequate consultation takes place to consider how best to protect the watercourses along the route.

2.22. A comment was received from a member of the public about the potential impact on mature trees along a section of the dismantled railway line at the western end of the route. The respondent suggested that an alternative connection to tower AK005 would avoid the loss of mature trees, including beech and Scots pine. It would also allow three additional towers to be removed.

Socio Economic

2.23. A written concern was raised by a member of the public about the potential impact on farmland.

Choice of Technology

2.24. Written feedback from a member of the public included a concern about whether wood poles would withstand the prevailing weather conditions, and a suggestion that the connection should be placed underground.

Transport and Construction

2.25. Comments focussed on the crossing of the A75 trunk road and potential increase in traffic on the trunk road network.

Appraisal of Feedback

2.26. The number of public responses both written and during the online session was very limited.

2.27. Most of the respondents' concerns relate to the construction phase and are addressed through the provision of appropriate and agreed mitigation measures during construction.

2.28. In considering the feedback, SP Transmission plc and the environmental team considered whether changes needed to be made to the preferred route. This exercise followed the same approach for identifying and evaluating route options as set out in the Routeing and Consultation Document (June 2022). The appraisal focussed on the western end of the route and considered a series of localised criteria including proximity to individual dwellings. This exercise resulted in a change to the preferred route north of Annan, with the route now connecting into tower AK005 to the east of the dismantled railway line. This alignment avoids crossing the wooded corridor along the dismantled railway line. It also allows the removal of towers AK006 - AK008.

2.29. The optioneering and appraisal exercise is set out in the following section of this report.

3. REVISED PROJECT PROPOSAL

Background

3.1. As explained in Section 2 (paragraph 2.22), SP Transmission plc received a written comment from a local resident expressing concern about the alignment of the western end of the preferred route to the west of the disused railway line north of Annan, which would require the removal of several mature trees. The respondent requested that consideration be given to the identification of options to avoid this vegetation loss.

3.2. In response to this feedback, the company have reviewed and amended the western end of the preferred route and developed an alternative connection into tower AK005. This avoids crossing the dismantled railway line and the need to remove the associated mature trees.

3.3. The area under consideration and the preferred route which was the focus of the Stage One Consultation are shown in Figure 3.

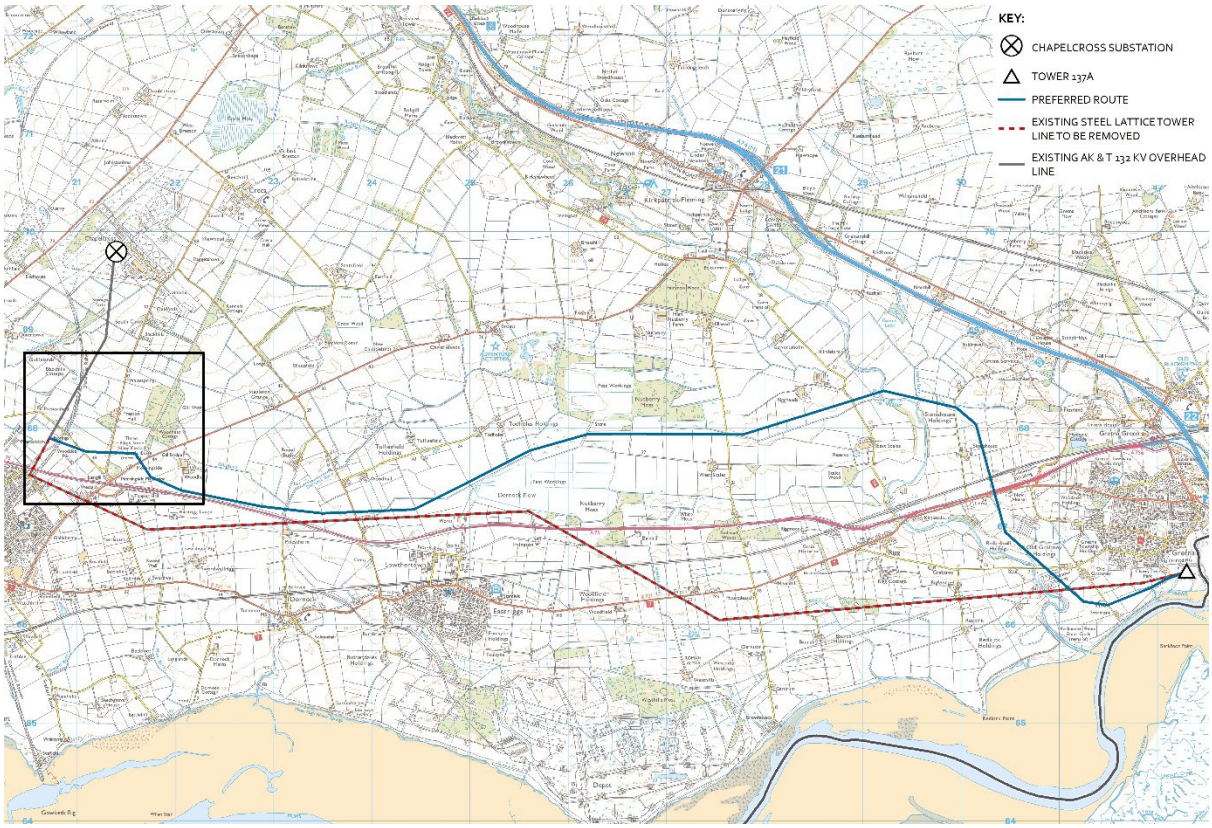


Figure 3: Location Plan and Preferred Route

Approach

3.4. The approach to the options identification and appraisal follows the methodology outlined in SP Energy Networks' Routeing and Consultation Document (June 2022), which in turn takes cognisance of the Holford Rules[3].

3.5. In summary, in accordance with the Holford Rules 1 and 2, the process of selecting route options involved the avoidance wherever possible of areas of high environmental value. These

3 It is generally accepted across the electricity industry that the guidelines developed by the late Lord Holford in 1959 known as the 'The Holford Rules', should continue to be employed as the basis for routeing high voltage overhead lines.

areas include areas of natural and cultural heritage value typically designated at a national, European or international level as these are afforded the highest levels of policy protection.

3.6. Consideration was given to Holford Rule 3 which states that, other things being equal, the most direct route should be selected.

3.7. Holford Rules 4 to 6[4] were also applied. These relate to the general 'fit' of the overhead line within the landscape as follows:

The Holford Rules
Avoid the higher ground, ridges and skylines (Holford Rules 4 and 5).
Follow the grain of the landscape, running within valleys, in parallel with woodland edges, field boundaries etc. wherever possible.
Use woodland and landform as a backdrop to the line, or as a foreground screen (Holford Rule 4).
Minimise the number of crossings of linear features (e.g., roads and rivers), and when appropriate cross at a perpendicular angle.
Protect existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape (Holford Rule 5).
Avoid creating a wirescape with existing infrastructure (Holford Rule 6).
Avoid residential areas as far as practicable, including individual properties which could be adversely affected.

Alternative Route Options

3.8. Following the guidance in the Holford Rules, three route options were identified and are shown in Figure 4. Each of these options comprises two sub-options associated with a connection either to tower AK004 or tower AK005. A connection to tower AK005 would require a replacement angle tower to allow the transition from wood pole support structures to towers, whilst a connection to tower AK004 could be made directly.

3.9. All the options shown in Figure 4 are within the routeing study area identified in SP Energy Networks' Routeing and Consultation Document (June 2022).

[4] Holford Rule 7 relates to urban areas and is not relevant to this project.

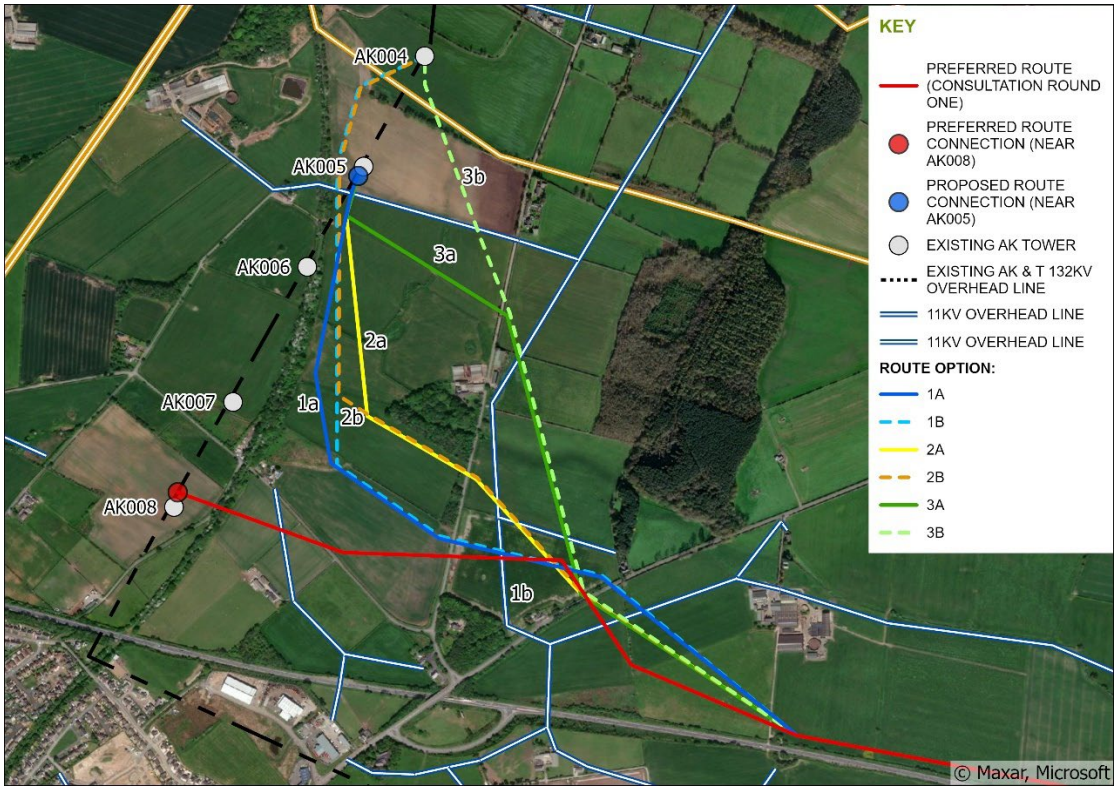


Figure 4: The Preferred Route and the Route Options Identified in Response to the Stage One Consultation Feedback

Preferred Route

3.10. The preferred route, which was the subject of the Stage One Consultation, starts at a connection with tower AK008 and crosses the wooded corridor of the dismantled railway line north of Annan. It continues in a broadly easterly direction through the farmland which lies between the properties of Woodside Park and Bellsprings. It then turns to a south-easterly direction and passes between the two Morningside properties and Gillwood, before obliquely crossing the open fields to the south-west of Woodhead and aligning broadly parallel to the A75.

3.11. Approximately 800m^2 of mature vegetation including six mature trees along railway corridor would have to be removed to allow for construction and ongoing management of the wayleave corridor. In crossing the former railway line, the presence of a new overhead line would also affect the views experienced by users of an unnamed road, which runs close to the dismantled railway line and provides cycle and pedestrian access to the countryside from Windermere Road on the north side of Annan.

Option 1:

3.12. Option 1a starts at a connection with a new angle tower close to tower AK005. Tower AK005 would be removed as part of the new overhead line. From here it runs in a southerly direction following a broadly parallel alignment east of the former railway line to an area of rough grassland to the rear of Bellsprings. It then turns to a south-easterly alignment to follow a field boundary hedgerow, passing between the two Morningside properties and Gillwood, before obliquely crossing the open fields to the south-west of Woodhead and joining the route of Options 2 and 3 close to the A75 as shown in Figure 5.

3.13. Option 1b starts at a connection with tower AK004 and runs west for a short distance before turning south and following the eastern side of the dismantled railway line to join the route of Option 1a.

3.14. The length of Option 1a is approximately 1.9km and Option 1b is 2.2km.

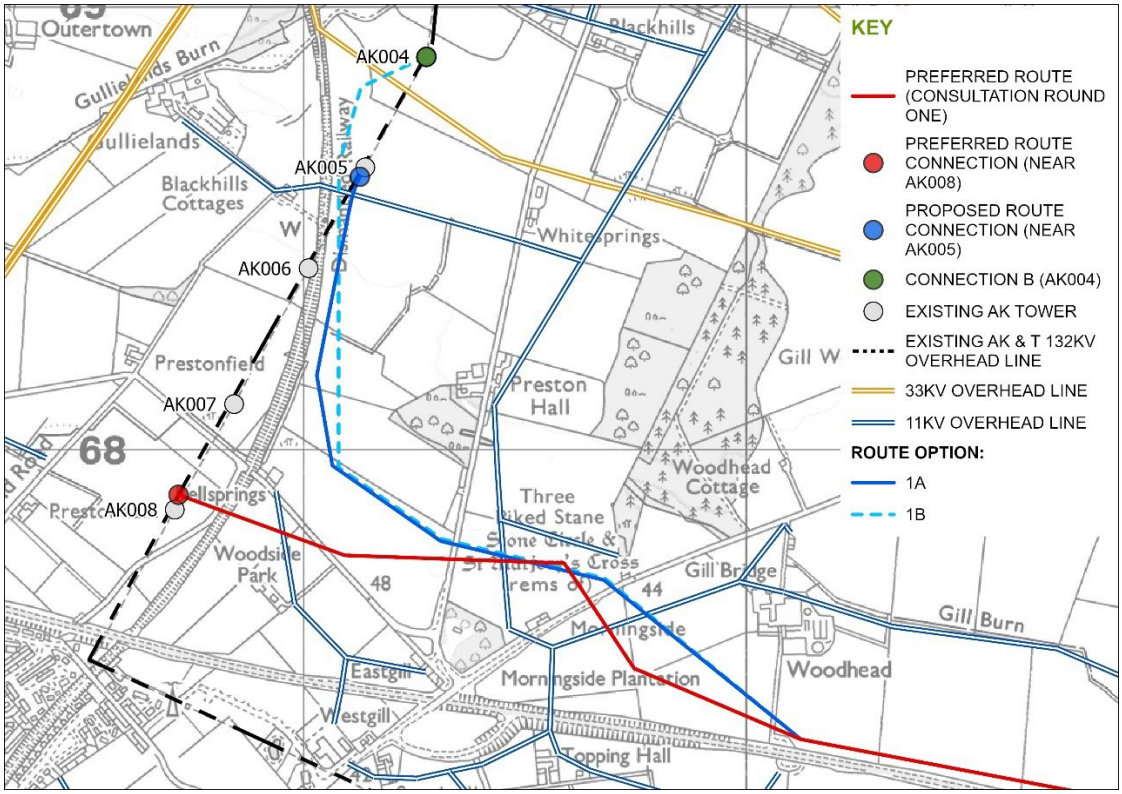


Figure 5: Route Options 1a and 1b

Option 2:

3.15. Option 2a starts at a connection with a new angle tower close to tower AK005 (which would be removed). It follows a broadly southerly alignment crossing the open fields to the west of Preston Hall Farm before turning to the south-east to run broadly parallel to the south side of the block of woodland close to the farm. It continues on a south-westerly alignment through the farmland passing between the two Morningside properties and Gillwood, before obliquely crossing the open fields to the south-west of Woodhead and joining the route of Options 2 and 3 close to the A75 as shown in Figure 6.

3.16. Option 2b starts at a connection with tower AK004 and runs west for a short distance before turning south and following a broadly parallel alignment east of the former railway line to an area of rough grassland west of Preston Hall Farm. It then turns to a south-easterly alignment to join the route of Option 2a.

3.17. The length of Option 2a is approximately 1.8km and Option 2b is 2.2km.

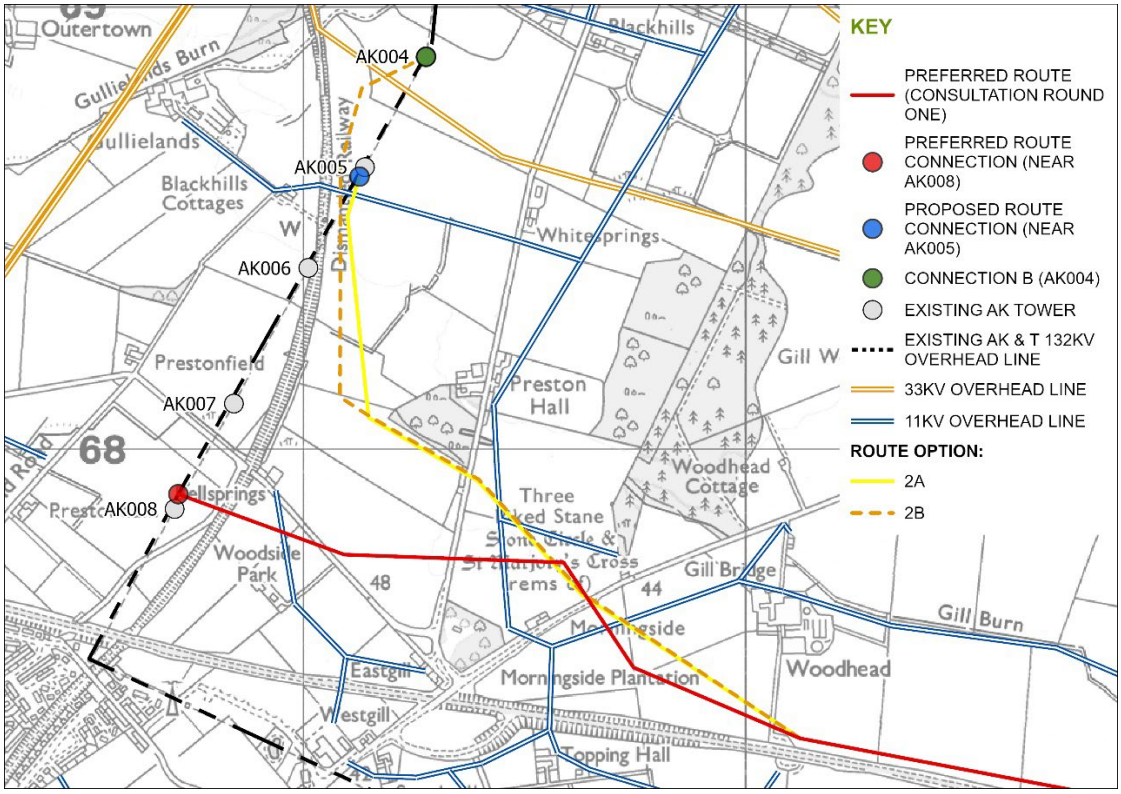


Figure 6: Route Options 2a and 2b

Option 3:

3.18. Option 3a starts at a connection with a new angle tower close to tower AK005 (which would be removed). It follows a south-easterly alignment, crossing the open fields to the west of Preston Hall Farm. North of the farm it turns to a more southerly direction and obliquely crosses the open fields between Preston Hall and Gill Wood. At the B6357 between the two Morningside properties and Gillwood, it turns back to a south-easterly alignment before obliquely crossing the open fields to the south-west of Woodhead and joining the route of Options 1 and 2 close to the A75 as shown in Figure 7.

3.19. Option 3b starts at a connection with tower AK004 and runs in a south-westerly direction across the open fields west of the three Whitesprings properties before joining the route of Option 3a close to Preston Hall Farm.

3.20. The length of Option 3a is approximately 1.8km and Option 3b is 1.9km.

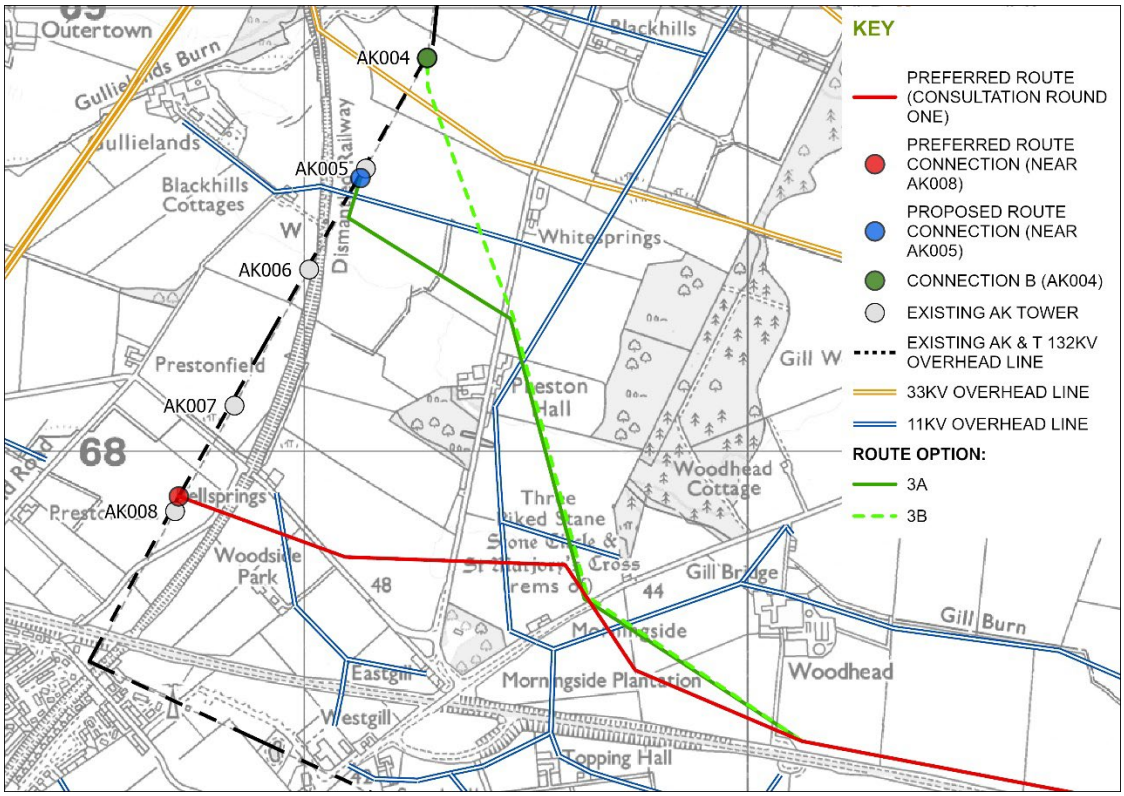


Figure 7: Route Options 3a and 3b

Route Appraisal

3.21. Having identified a series of route options/sub-options, these were then appraised with the objective of examining each route in a comparable and transparent way to identify the proposed route for stage two of the consultation. The proposed route was identified using professional judgement, informed by both desk studies and field work, and also reflecting the Holford Rules. The process sought to:

Comply with Section 9 of the Electricity Act which requires a licence holder to '*identify technically feasible and economically viable routes for electrical overhead lines that meet the technical requirements of the electricity network and cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it*'.
Continue to reflect SP Energy Network's routeing approach, which is based on the premise that the most likely effect of an overhead line is visual but this can be limited by careful routeing.
Continue to reflect the Holford Rules.
Draw out distinctions between the routes to enable the relative strengths and weaknesses of each to be identified.
Protect existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape (Holford Rule 5).

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

Appraisal Criteria

3.23. The route options were comparatively appraised under the following topics as these were considered to be potential differentiators:

- Length of route;
- Landscape and visual amenity;
- Biodiversity and geological conservation;
- Historic environment;
- Hydrology and soils; and
- Technical considerations.

3.24. Table 3.1 sets out the results of the appraisal. It should be noted that the names of properties referred to in the appraisal are taken from the Ordnance Survey Maps or Bing UK Maps and may not reflect their current names.

Table 3.1: Evaluation of Route Options

Topic Area	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Preferred Route
Approximate Length of Route and Number of Angle Poles *Note - All measurements are approximate and measured from the centre line of the routeing corridor. It should be noted that if the route is microsited within the routeing corridor, then these measurements could increase or decrease.*	1910m	2260m	1770m	2170m	1760m	1860m	**Summary:** In order of decreasing preference: 2a = 3a > 3b > 1a > 2b > 1b **Options 2a and 3a are therefore preferred in terms of the length of route.**
Landscape	All the route options cross an area of gently rolling arable fields and pastures which become more steeply rolling to the north and are bordered by low clipped hedgerows with occasional blocks of woodland. The landscape is classified by NatureScot[5] as LCT 170 Coastal Plateau and LCT 158 Coastal Flats. No designations apply to the landscape, which is considered to have medium-high sensitivity to a new wood pole overhead line as overhead lines are already present in the landscape. The broad character of the landscape is therefore not a differentiator, but each route option is considered in terms of how well it follows the field and hedgerow pattern as this helps to visually integrate a wood pole overhead line into the landscape. There is little differentiation between the route options south of the B6357 as they all follow broadly the same alignment across the fields. The assessment below therefore focusses on appraising the options to the north of this road. All the options would require the removal of a very small number of trees but this would be very localised and would not affect wider visual amenity so is not a differentiator in landscape terms. Tree removal from an ecological perspective is considered under Biodiversity and Geological Conservation.					
	Option 1a and 1b both follow the grain of the landscape as they are both aligned broadly parallel to the dismantled railway and follow the field boundaries.	Option 2a obliquely crosses the open fields to the west of Preston Hall Farm whilst Option 2b is aligned broadly parallel to the dismantled railway.	Option 3a and 3b both obliquely cross open fields from their connections at towers AK004 and AK005 respectively to the B6357.	**Summary:** Options 3a and 3b are the least preferred as they do not follow the grain of the landscape.		

[5] NatureScot (https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscape-character-types-map-and-descriptions) digital Landscape Character Types Map and Descriptions

	There is little to differentiate between Options 1a and 1b.	Both options follow the edge of the woodland south of Preston Hall Farm before obliquely crossing the two open fields to the east of the lane leading from the B6357 to Preston Hall Farm. **Option 2b** is marginally preferred as it follows the grain of the landscape more than Option 2a.	**Option 3a** is preferred as it lies further from the area of small traditional hedged pastures to the north-east of the three Whitesprings properties and follows the grain of the landscape north of Preston Hall Farm slightly more than Option 3b and.	Option 1a, 1b and 2b are marginally preferred over Option 2a as they are aligned more closely to the route of the dismantled railway but there is little to differentiate between them. In order of decreasing preference: 1a = 1b = 2b > 2a > 3a > 3b **Options 1a and 2b are therefore preferred in terms of landscape.**
Visual Amenity *Note - The number of properties in proximity to a route corridor are an approximate guide only, being calculated using GIS to identify the number of properties recorded on the OS AddressBase Plus® data layer within a specified distance of the centre line of the route option.* *Properties or groups of properties are named according to the name provided on OS plans.*	This is an area of consistently settled farmland where several dispersed dwellings and farmsteads are located close to the route options. There are no Core Paths in this area and no Public Rights of Way marked on the ordnance survey (OS) plans. The assessment considers properties in close proximity, where occupants would potentially have views of the new overhead line when living in and moving around the property. These include properties at Blackhills, the property associated with 'Solway Swim', three Whitesprings properties, Preston Hall Farm, Bellsprings, Woodside Park, two Morningside properties, Gillwood and Woodhead Farm. Options 1a, 1b and 1c would require a new angle tower to the south of tower AK005 (which would be removed). This would potentially be more noticeable from properties at Preston Hall and the three Whitesprings properties as it is approximately 1m taller than the existing tower, but its presence would not change the composition or character of the view (which would also benefit from the removal of towers AK006 - AK008). Options 1b, 2b and 3b would bring the new 132kV overhead line closer to Blackhills and Solway Swim. Due to the rolling landform and the elevation of these properties, the new wood pole supports would be prominent on the skyline.			
	Proximity to Properties **Option 1a** Properties within 100m = 2 Properties within 200m = 6 Properties within 300m = 7 *Total = 15*	**Proximity to Properties** **Option 2a** Properties within 100m = 2 Properties within 200m = 7 Properties within 300m = 9 *Total = 18*	**Proximity to Properties** **Option 3a** Properties within 100m = 2 Properties within 200m = 7 Properties within 300m = 8 *Total = 17*	**Summary:** All the options are within 100m of two properties so there is little to differentiate between them. All options except 3b are within 200m of 6/ 7 properties.

	Option 1b Properties within 100m = 2 Properties within 200m = 6 Properties within 300m = 10 *Total = 18*	**Option 2b** Properties within 100m = 2 Properties within 200m = 7 Properties within 300m = 12 *Total = 21*	**Option 3b** Properties within 100m = 2 Properties within 200m = 10 Properties within 300m = 14 *Total = 26*	Options 1b, 2b and 3b are all within 300m of ten or more properties. Options 1a, 2a and 3a are preferred over Options 1b, 2b, and 3b as they pass closer to a fewer number of properties. **Option 1a is therefore preferred as it passes close to the fewest number of properties.**
	Option 1 would be closer to the two Morningside properties, Gillwood, Woodside Park and Bellsprings than Options 2 or 3. Option 1b would introduce a new wood pole overhead line into skyline views from the Blackhills, Solway Swim and the three Whitesprings properties. Option 1a would introduce a slightly larger angle tower into the view. Option 1a and 1b would cross two lower voltage overhead lines in the farmland between Preston Hall Farm and the B6357 but would create a less cluttered skyline than Options 2a and 2b. **Option 1a** is preferred as it avoids potential effects on the visual amenity experienced by occupants of Blackhills, Solway	Option 2 would be further from the two Morningside properties, Gillwood, Woodside Park and Bellsprings than Option 1. It would be closer to Preston Hall Farm than Option 1 but would be partially obscured in views from the farm by the intervening woodland. Option 2b would introduce a new wood pole overhead line into skyline views from the Blackhills, Solway Swim and the three Whitesprings properties. Option 2a would introduce a slightly larger angle tower into the view. Option 2a would be closer to the three Whitesprings properties and Preston Hall Farm than Option 1b. Option 2a and 2b would cross two lower voltage overhead	Option 3 would be further from properties at Woodside Park and Bellsprings but would be closer to the three Whitesprings properties and Preston Hall Farm than Options 1 or 2. Option 3b would be closest to Blackhills, Solway Swim and the three Whitesprings properties. The poles would be more prominent compared to Options 1b and 2b and would be clearly visible on the skyline in views from the front of these properties. Option 3a would introduce a slightly larger angle tower into the view. Option 3a and 3b would cross two lower voltage overhead lines in the farmland between Preston Hall Farm and the B6357	**Summary:** Options 1a, 1b and 1c are preferred over Options 1b, 2b, and 3b due to the potential effects on the visual amenity experienced by occupants of Blackhills, Solway Swim and the three Whitesprings properties. Options 1 and 3 are considered better than Option 2 because they avoid a potential wirescape within the fields between Preston Hall Farm and the B6357. In order of decreasing preference: 1a > 2a > 3a > 1b > 2b > 3b **Option 1a is therefore preferred in terms of visual amenity.**

	Swim and the three Whitesprings properties.	lines and create a potential wirescape in the fields between the Preston Hall Farm and the B6357. **Option 2a** is preferred as it avoids potential effects on the visual amenity experienced by occupants of the Blackhills, Solway Swim and the three Whitesprings properties.	but would create a less cluttered skyline than Options 2a and 2b. **Option 3a** is preferred as it avoids potential effects on the visual amenity experienced by occupants of Blackhills, Solway Swim and the three Whitesprings properties.	
Biodiversity and Geological Conservation	All the options across an area of managed farmland comprising arable fields and pastures with close clipped hedgerows and occasional blocks of woodland including the small block next to Preston Hall Farm which is ancient in origin. There are no designated sites. All the route options cross a minor watercourse between Blackhills and Preston Hall Farm. The comparative assessment is therefore based on the approximate number of trees which would require removal for construction and wayleave purposes.			
	One mature field boundary tree would have to be removed from the hedgerow close to the crossing of the B6357 close to Gillwood (Options 1a and 1b). **There is little to differentiate between Options 1a and 1b.**	One mature field boundary tree would have to be removed from the hedgerow close to the crossing of the B6357 close to Gillwood (Options 2a and 2b). Up to four mature trees would have to be removed from the linear tree belt close to the ancient woodland at Preston Hall Farm (Options 2a and 2b). **There is little to differentiate between Options 2a and 2b.**	One mature field boundary tree would have to be removed from the hedgerow close to the crossing of the B6357 close to Gillwood (Options 3a and 3b). Up to five mature trees would have to be removed from the field boundary hedgerow south of tower AK004 (Option 3b only). Due to the higher number of trees which would potentially have to be removed near tower AK004, **Option 3a** is preferred.	**Summary:** Options 2a and 2b are the least preferable as they would require removal of part of the linear tree belt south of the woodland near Preston Hall Farm. Option 3b would require the removal of mature field boundary trees to the west of the three properties at Whitesprings. In order of decreasing preference: 1a = 1b = 3a > 3b > 2a = 2b **Options 1a, 1b and 3a are preferred in terms of**

				biodiversity and geological conservation.
Hydrology and Soils	All the route options cross one minor watercourse and none of them cross any recorded field drainage or mapped peat deposits.			**Summary:** All route options are considered viable in terms of hydrology and soils. This topic is not a differentiator in the selection of a preferred option.
Historic Environment	The nearest asset to the route options is non-designated (i.e., not scheduled). It is recorded in the Dumfries and Galloway HER as MDG7367: https://canmore.org.uk/site/66994/three-piked-stane. Its actual location (not clear from the OS base map) is NGR 321700, 567870. The monument consists of two granite boulders. There is insufficient evidence to confirm that this is a stone circle. As a non-designated asset, it is of Low (local) importance. The asset is over 300m from the current preferred route and there would be no significant effects on the assets from any of the options.			**Summary:** All route options are considered viable in terms of historic environment. This topic is not a differentiator in the selection of a preferred option.
Technical	Technically it would be easier to route from tower AK004, as this is an angle tower, which could allow a direct connection down onto the first wood pole, whereas routeing from tower AK005 would require the replacement of the existing tower to allow this transition. Tower AK005 is a suspension tower which is the same tower type as tower AK008 which is the proposed connection point for the preferred route. Technical constraints relate to slope angle, flood risk and areas of peat, none of which are a concern with these options. Access would be via local roads and then temporary field crossings. There are some slight variations in the length of the field crossings but all involve relatively flat terrain and use of existing field accesses. All the route options would have to cross the B6357 and the lane leading from the B6357 north to Chapelcross Power Station.			**Summary:** All route options are considered technically viable but **Options 1b, 2b and 3b** are considered preferable as they would not require a replacement tower.
	OHL Crossings: Option 1a would cross three 11kV overhead lines.	**OHL Crossings:** Option 2a would cross four 11kV overhead lines. Option 2b would cross four 11kV and one 33kV overhead line.	**OHL Crossings:** Option 3a would cross four 11kV overhead lines. Option 3b would cross four 11kV and one 33kV overhead line.	**Summary:** Option 1a has the fewest overhead line crossings. Option 2a and 3a have the same number of crossings, however, in the case of option 2a, two of these

	Option 1b would cross three 11kV and one 33kV overhead line. **Option 1a is preferred.**	**Option 2a is preferred.**	**Option 3a is preferred.**	crossing would be in very close succession. Option 1b, 2b and 3b would also have to cross a 33kV overhead near tower AK005. In order of decreasing preference: 1a > 3a > 2a > 1b = 3b > 2b **Option 1a** is therefore considered preferable.
	Angle Poles: **Option 1a** Angle poles required = 5 **Option 1b** Angle poles required = 5 **There is little differentiate between Options 1a and 1b.**	**Angle Poles:** **Option 2a** Angle poles required = 4 **Option 2b** Angle poles required = 5 **Option 2a is preferred.**	**Angle Poles:** **Option 3a** Angle poles required = 3 **Option 3b** Angle poles required = 3 **There is little differentiate between Options 3a and 3b.**	Option 1a, 1b and 2b would all require five angle poles. Option 2a would require four angle poles and Options 3a and 3b would each require three angle poles. In order of decreasing preference: 3a = 3b > 2a > 1a = 1b = 2b **Options 3a and 3b are preferred in terms of the number of angle poles required for changes in direction.**

Summary

3.32. This section identifies and comparatively appraises three alternative route options at the western end of the preferred route north of Annan. The three options are shown in Figure 3. Each of these options has a sub-option related to whether it would connect into existing tower AK004 or AK005. All options are technically deliverable but Option 1a, 2a and 3a would require a new and slightly larger terminal tower to the south of tower AK005 (which would be removed).

3.33. The options were comparatively appraised against four environmental topics but only landscape and visual amenity, and biodiversity and geological conservation were shown to be differentiators and were evaluated alongside technical considerations.

3.34. The comparative appraisal within this report concludes that Option 1a and 1b are preferred from a landscape perspective as they closely follow the grain of the landscape.

3.35. A connection into tower AK005 (Options 1a, 2a and 3a) is preferred visually as it would avoid the introduction of a new section of wood pole line into an area of higher and more open farmland (with potential implications for visual amenity).

3.36. Option 1 is preferred visually as it would avoid the potential for a wirescape in the fields between the B6357 and Preston Hall Farm.

3.37. Options 1a, 1b and 3a are preferred in terms of biodiversity and geological conservation because they would require the removal of the fewest trees.

3.38. Option 1b, 2b and 3b are preferred from a technical perspective as they would avoid the need for a replacement tower AK005.

3.39. Based on the appraisal, **Option 1a** is considered to be the option which best meets SP Transmission plc's routeing objectives and on balance, would cause the least disturbance to the environment and the people who live, work and enjoy recreation within it.

3.40. This option has been developed by SP Transmission plc's technical team and is shown in Figure 8 below.

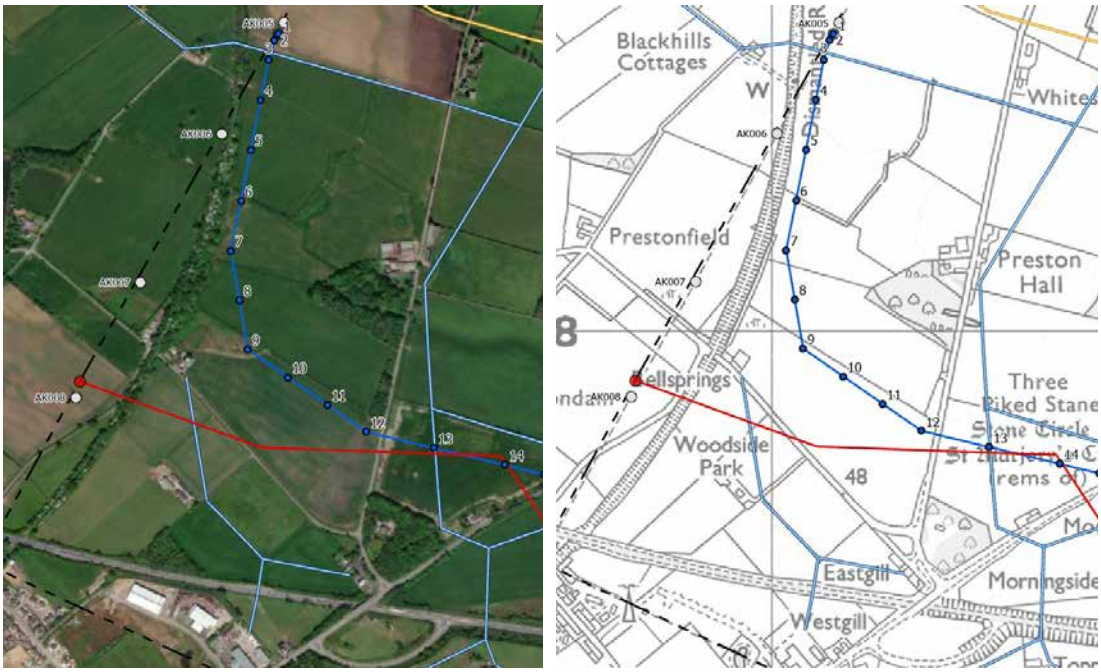


Figure 8: Design Change at the Western End of the Preferred Route

4. CONCLUSIONS AND NEXT STEPS

Conclusions

4.1. This report explains and summarises the work that SP Transmission plc and its technical and environmental teams have been carrying out following the Stage One Consultation, including a review of feedback and a review of the western end of the preferred line route against environmental and technical considerations.

4.2. The review of consultation feedback shows that most comments submitted relate to concerns about the impact of construction activities on sensitive nature conservation and historic environment assets, in particular the important designated areas associated with the Solway Firth and the many designated and undesignated historic environment assets along the route including the Battle of Sark Inventory battlefield. These concerns would be addressed through the implementation of good practice construction measures.

4.3. Following the review of feedback, and as set out in Section 3 of this report, the western end of the route has been re-evaluated in the light of concerns about the potential loss of mature trees along the dismantled railway line north of Annan. Section 3 sets out the process of identifying and appraising alternative route options and concludes with a new line alignment that connects into tower AK005 and avoids the need to remove mature trees along the former railway line. The new alignment is shown in Figure 5.

4.4. The amended route, which is now referred to as the proposed route, is shown in Figure 9.

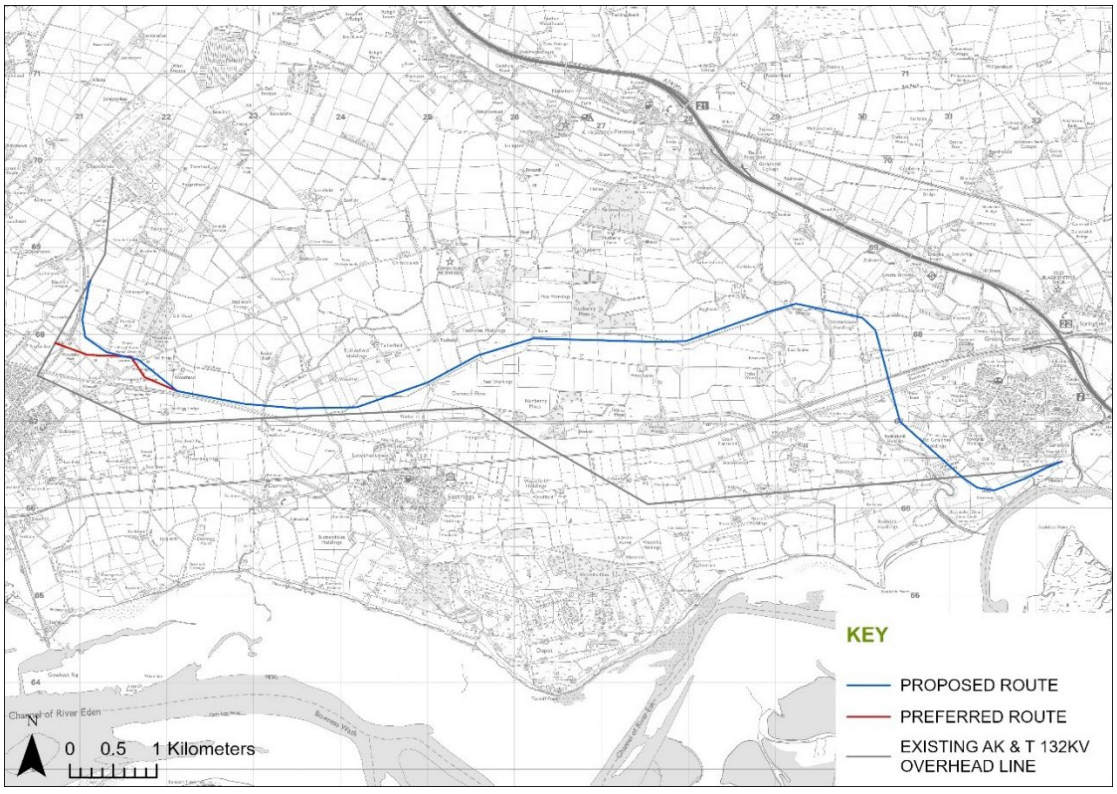


Figure 9: The Proposed Route

Next Steps

4.5. The outcome of this report is being presented at the Stage Two Consultation to advise local people of the updated project. Information presented in the Stage Two Consultation will outline how the proposed route will form the basis for the EIA Scoping Report. If required, minor amendments will be made to the proposed route following the EIA survey work, technical design, and ongoing discussion with landowners. Detailed information will be added including an indicative line alignment, access points, and construction areas), before an application is submitted to the Scottish Ministers for Section 37 consent under The Electricity Act 1989 and a request for deemed planning permission under Section 57 of the Town and Country Planning Act 1997.

4.6. Assessment work on the T Route Rebuild Project, including EIA assessment, will be carried out up until submission of the S37 application to the Scottish Ministers. This assessment will be reported on in the EIA Report and shadow Habitats Regulation Assessment, which will accompany the applications.

APPENDIX A – List of consultees

Statutory Consultees

- Allerdale Borough Council
- Carlisle City Council
- Cumbria County Council
- Dumfries and Galloway Council
- Eden District Council
- Environment Agency
- Historic England
- Historic Environment Scotland
- Natural England
- Nature Scot
- Scottish Environment Protection Agency (SEPA)
- Scottish Government ECU

Internal Scottish Government Advisors

- Transport Scotland
- Marine Scotland
- Scottish Forestry

Non statutory Consultees

- Arthuret Parish Council
- Association for the Protection of Rural Scotland
- BAA Aerodrome Safeguarding (Aberdeen)
- BAA Aerodrome Safeguarding (Edinburgh)
- Bowness-on-Solway Parish Council
- British Horse Society
- BT
- Canonbie and District Community Council
- Civil Aviation Authority – Airspace
- Crown Estate Scotland
- Cummertrees and Cummertrees West Community Council
- Defense Infrastructure Organisation (MoD)
- Dumfries & Galloway Archaeological Services
- Edinburgh Airport
- Fisheries- Local District Salmon Fisheries
- Fisheries Management Scotland
- Forestry Land Scotland

- Galloway and Southern Ayrshire Biosphere
- Glasgow Airport
- Glasgow Prestwick Airport
- Gretna and Rigg Community Council
- Hoddom and Ecclefechan Community Council
- John Muir Trust
- Joint Radio Company
- Kirkandrews-on-Esk Parish Council
- Kirkpatrick Fleming and District Community Council
- Kirtle and Eaglesfield Community Council
- Maritime and Coastguard Agency
- Mountaineering Scotland
- National Air Traffic Services
- National Grid
- National Trust (England)
- National Trust for Scotland
- NATS Safeguarding
- Network Rail
- Nuclear Safety Directorate
- RAF
- Rockcliffe Parish Council
- Royal Burgh of Annan Community Council
- RSPB Scotland
- Scottish Canoe Association
- Scottish Fisheries
- Scottish Rights of Way (ScotWays)
- Scottish Water
- Scottish Wildlife Trust
- Solway Coast AONB
- Springfield and Gretna Green Community Council
- Sustrans Scotland
- The Coal Authority
- Visit Scotland
- West of Scotland Archaeology Service
- Westlinton Parish Council

Copy of email sent to consultees

From: Lindsay Robinson
To: XXX
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Date: 11 July 2022 10:24:25
Attachments: T_Route_Rebuild_The_Preferred_Route_July_2022.pdf
image001.png
image002.png
image003.png

Dear Sir/ Madam

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached plan: *T – Route Re-build_The Preferred Route_July 2022*

To summarise the likely works:

- The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to tower AK008 and tower T137A (please refer to the attached plan for details which shows a preferred option). The towers used will be single trident wood poles with two double 'H poles' required at the east and west ends of the route respectively. A preferred route has been established and is the subject of this consultation.

- Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK008.

- Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing electric line near tower T137A.

- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a routeing study, assist with consultation and co-ordinate the production of an Environmental Impact Assessment.

The consultation will run for 30 days from the **11th July** to the **9th August** The project website can be found at https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

All the consultation documents can be downloaded from the website, including the Routeing and Consultation Documents (Volume I Main Report and Volume 2 the Technical Appendices and Figures).

We would welcome your consultation responses during the consultation period. Contact details for the responses are included at the end of Volume 1 of the Routeing and Consultation Document and are as follows:

Emails address: Troute@spenergynetworks.co.uk

By post to:
Brendan Tinney
T Route Rebuild
SP Energy Networks,
55 Fullarton Drive, Cambuslang,
Glasgow,
G32 8FA

Please note, it is important that consultation responses to the proposals are made through these channels rather than directly to Gillespies.

Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Yours faithfully

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

T ROUTE REBUILD

JULY 2022

THE PREFERRED ROUTE

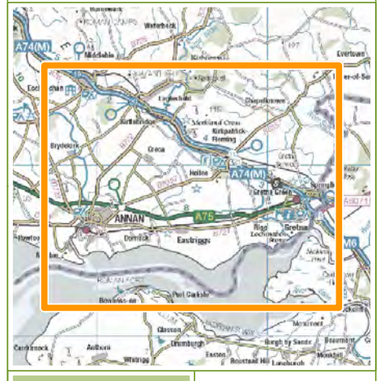
KEY

- TOWER AK008
- TOWER T137A
- EXISTING STEEL LATTICE TOWER LINE TO BE REMOVED BETWEEN TOWERS AK008 AND T137A
- EXISTING AK & T 132 KV OVERHEAD LINE
- PREFERRED ROUTE
- 100M CORRIDOR (50M EITHER SIDE OF ROUTE OPTION)
- ROUTEING STUDY AREA
- LOCAL AUTHORITY BOUNDARIES

Ecclefechan
Eaglesfield
Annandale
Milltown
Tower-of-Sark
Chapelknowe
Kirtlebridge
Kirkpatrick-Fleming
Creca
Brydekirk
Hollee
Springfield
Gretna Green
Gretna
ANNAN
Rigg
Eastriggs
Dornock
Annandale
Newbie
Bowness-on-Solway
Port Carlisle
ROCKCLIFFE CP

0 0.5 1 2
Kilometres

MAP SCALE AT A3 - 1:50,000



GILLESPIES

SP ENERGY NETWORKS

APPENDIX B – Consultation Materials

Consultation - Have your Say

A copy of this information leaflet is being sent to all properties within 200m of the section of T Route which is to be dismantled and also those properties within 200m of the preferred route. The consultation will also be advertised in local newspapers and a printed poster explaining the project and the consultation will be displayed on public notice boards.

We would invite you to view the project website (address below) which will provide more information on the project including a Routeing Consultation Document which provides details of the initial stages of work undertaken to identify a preferred route alignment for the grid connection. This has involved the review of key environmental features of the study area, identification of alternative routes and analysis of route options.

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

All responses received during the consultation period will be considered in combination with the findings of the Routeing and Consultation Document to enable SP Energy Networks to decide on the proposed route to be progressed to the Second Round of consultation and EIA (Environmental Impact Assessment) stage. An opportunity to comment formally to the Energy Consents Unit will follow at a later stage in the process following consultation by the Scottish Government once the application is submitted to them. Commenting informally at this stage does not remove the right or potential need to comment on the final application.

How do I get in touch?

The consultation will run for 30 days between 11th July and 9th August 2022 although information relating to the project will remain on the project website and available for download before and after these dates. You can get in touch by:

- Emailing us directly at **TRoute@spenergynetworks.co.uk**;
- By post, allowing 7 days for receipt and sending your comments to this address:

Brendan Tinney,
T Route Rebuild,
Land and Planning
55 Fullarton Drive
Cambuslang, G32 8FA

T Route Rebuild Project

Consultation Information Leaflet

Project website:
https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

SP ENERGY NETWORKS

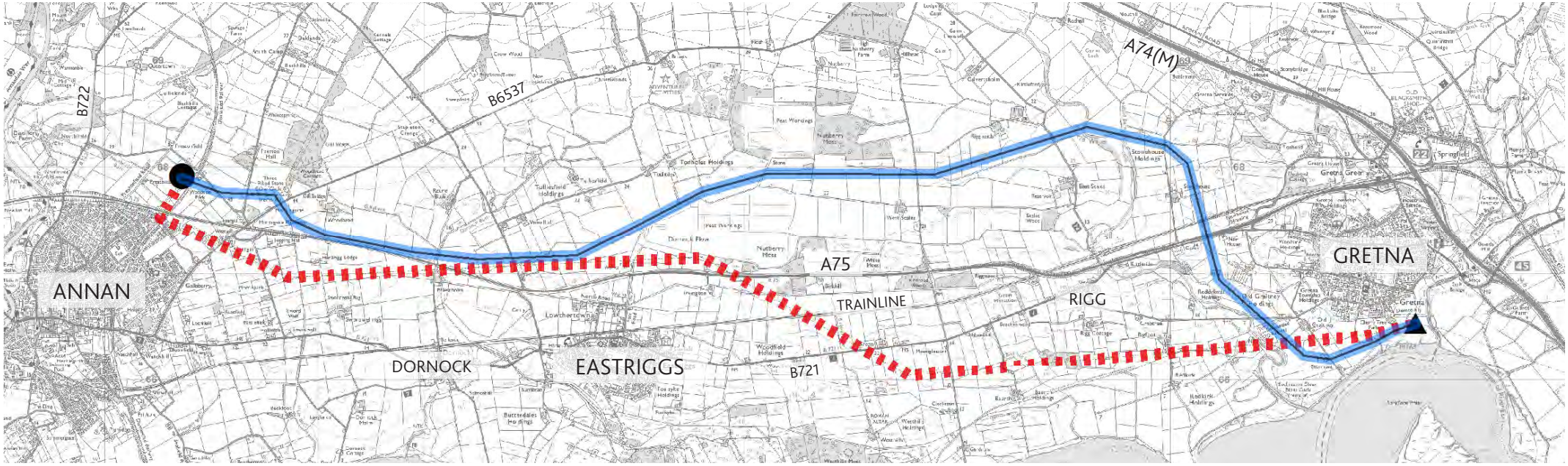
The Project

Due to the age of the overhead line, SP Energy Networks needs to rebuild approximately 13.5km of the existing 132kV, steel tower connection (known as 'T Route'), which currently extends between 'AK Route' north of Annan to the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south east of Gretna. There are three main elements to the project which can be seen on the Figure below:

- The existing steel lattice tower line forming 'T Route' is shown below as a red dashed line. This section of overhead line will be rebuilt as a wood pole line on a different route between a point close to tower AK008 north of Annan and tower T137A, south of Gretna. The new overhead line will use single trident wood poles with two double 'H poles' required at the east and west ends of the route respectively. A preferred route has been established and is the subject of this consultation and is shown as a blue line in the figure below. A 50m allowance either side of the preferred route has been included to allow for siting of the overhead line during the more detailed design phase. Wood poles are typically 11m to 16m high, but can be taller, for instance at road and rail crossings. Conversely they can be smaller, for instance where the spans are short. This is in comparison to the existing steel towers which are typically 20m tall.
- Additionally, one new terminal steel lattice tower will be needed adjacent to the AK Route near Annan and two new towers will be required at the NGET boundary south of Gretna. These will be of a steel lattice construction fabricated from high tensile steel. As the new overhead line will be single circuit, only one side of the tower will carry conductors (wires).
- The existing 132kV steel lattice towers along the redundant section of the route (shown below as a red dashed line) will be dismantled, removed and the ground restored following construction of the replacement overhead line.

KEY

- TOWER AK008
- TOWER T137A
- EXISTING STEEL LATTICE TOWER LINE TO BE REMOVED BETWEEN TOWERS AK008 AND T137A
- PREFERRED ROUTE FOR OVERHEAD LINE USING WOOD POLES. INCLUDES A 50M ALLOWANCE EITHER SIDE TO ALLOW FOR SITING AT DETAILED DESIGN



Typical Trident single wood pole

Typical double wood 'H Pole'

Single circuit steel lattice tower

Proposed Overhead Line **Design**

Following considerable environmental planning, the route above has been selected as the preferred route in order to minimise effects on the environment and on people. We now want to hear from you. Involving local people in the project is extremely important to us so that we can identify any issues and address any concerns. We would therefore invite you to view the project website which contains more detail in relation to the project and preferred route and tells you how you can provide us with your feedback.

Email to community and parish councils on the first day of the consultation

Dear XXXXXXX,

FAO XXXXXX community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

To summarise the likely works:

- The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to tower AK008 and tower T137A (please refer to the attached poster which shows the preferred option). The towers used will be single trident wood poles with two double 'H poles' required at the east and west wends of the route respectively. A preferred route has been established and is the subject of this consultation.
- Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK008.
- Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing electric line near tower T137A.
- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a routeing study, assist with consultation and co-ordinate the production of an Environmental Impact Assessment.

The consultation will run for 30 days from the 11th July to the 9th August. The project website can be found at: https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

All the consultation documents can be downloaded from the website, including the Routeing and Consultation Documents (Volume I Main Report and Volume 2 the Technical Appendices and Figures).

We would welcome your consultation responses during the consultation period and would also like to offer a Microsoft Teams call at a time and date of your choosing to allow the community council to ask any questions you might have of the project team. If this is something you would be interested in, please confirm and provide suggested dates and times and we will look to coordinate this.

Contact details for the responses are included at the end of Volume 1 of the Routeing and Consultation Document and are as follows:

Email address: Troute@spenergynetworks.co.uk

By post to:

Brendan Tinney

T Route Rebuild

SP Energy Networks,

55 Fullarton Drive, Cambuslang,

Glasgow,

G32 8FA

Please note, it is important that consultation responses to the proposals are made through these channels rather than directly to Gillespies.

Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Regards,

Brendan Tinney.

Date: 19.05.22

Contact: Brendan Tinney

Dear

Consultation on the T Route overhead line rebuild project - Landowner Update May 2022

We contacted you last year to explain that the routeing process is under way to find a new continuous overhead line route to replace the existing steel tower route between Annan and Gretna with a 132kv wood pole connection. We are now writing to confirm that the public consultation is due to start within the next few weeks and to make you aware that our consultants are likely to be in contact soon to arrange walkover surveys to gather environmental information. Should you have any queries on the above, please contact the project mailbox at routerebuild@spenergynetworks.co.uk .

Attached is a plan showing the current preferred route (Figure 1) and the existing route. A number of route options were reviewed and compared to determine the preferred route. Feedback from the public consultation exercise will inform this preferred route further and will allow SPT Plc to make any necessary amendments to it prior to confirming it as the proposed route. The proposed route will then be subject to detailed surveys before being submitted to the Energy Consents Unit at the Scottish Government for Section 37 consent and deemed planning permission.

Next Steps

Based on the current project programme, detailed surveys of the proposed route are anticipated through 2022 and the application to the government is expected to be made in mid-2023.The Scottish Government will then undertake formal public consultation at that time, prior to making their decision.

The proposed route will be subject to an application to the Scottish Ministers for Section 37 consent under The Electricity Act 1989 and a request for deemed planning permission under Section 57 of the Town and Country Planning Act 1997. Further to this, the development will also be subject to an Environmental Impact Assessment (EIA) that will identify and assess the potential significant effects of the development on issues such as landscape and visual, ecology, ornithology, hydrology and cultural heritage interests within the study area.

This assessment will be detailed in the associated EIA Report (EIAR) which will be submitted in support of SPEN's Section 37 application for the overhead line which will be submitted to the Scottish Ministers in mid-2023. Once submitted, the Scottish Government will undertake a formal public consultation period during which those who wish to make representation on the project can do so directly to the Ministers. The Section 37 submission will be advertised in the local press however SPEN will contact you prior to this time in order to make you aware of when the formal

consultation period will take place and who to write to should you wish to make further representation.

Where the proposed route and/or existing steel tower route crosses land which is owned or tenanted by you, SPEN's land officer Steven McChristie will be in touch in due course to discuss wayleave/servitude rights.

In the meantime, should you require any further information on the Project, please do not hesitate to contact us using the details provided.

Yours sincerely

Brendan Tinney
Environmental Planning
SP Energy Networks

APPENDIX C – Presentation Boards

SP ENERGY NETWORKS

T ROUTE REBUILD PROJECT

CONSULTATION PRESENTATION BOARDS

JUNE 2022

P11571-00-001-0709-06

01 WELCOME

THIS CONSULTATION

Thank you for visiting the project website for the T Route Rebuild Project.

These information boards along with a copy of the Routeing and Consultation Document, including all technical appendices and figures to support the report, are available to download from the project website:

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

This consultation will run for 30 days between 11th July and 9th August 2022.

but all information will remain accessible on the project website after this date.

The purpose of this consultation is to:

- Explain the need for the T Route Rebuild Project;
- Explain the routeing process which has resulted in a number of route options;
- Explain which of those routes has been identified as a preferred route and why;
- View the preferred route;
- Explain the next steps and how you can provide feedback; and
- Identify any local issues or concerns that people wish to draw to our attention.

Photo 1: Tower T137A south of Gretna

02 INTRODUCTION

Due to the age of the overhead line, SP Energy Networks needs to rebuild approximately 13.5km of the existing 132kV, steel tower connection (known as 'T Route'), which currently extends between 'AK Route' north of Annan to the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south east of Gretna. The existing steel tower route is shown on Figure 1.

There are three main elements to the project:

- The existing steel lattice tower line forming 'T Route' will be rebuilt as a wood pole line on a different route between a point close to tower AK008 and tower T137A. A preferred route has been established and is the subject of this consultation.
- Additionally, one new terminal steel lattice tower will be needed adjacent to the AK Route near Annan and two new towers will be required at the NGET boundary south of Gretna.
- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

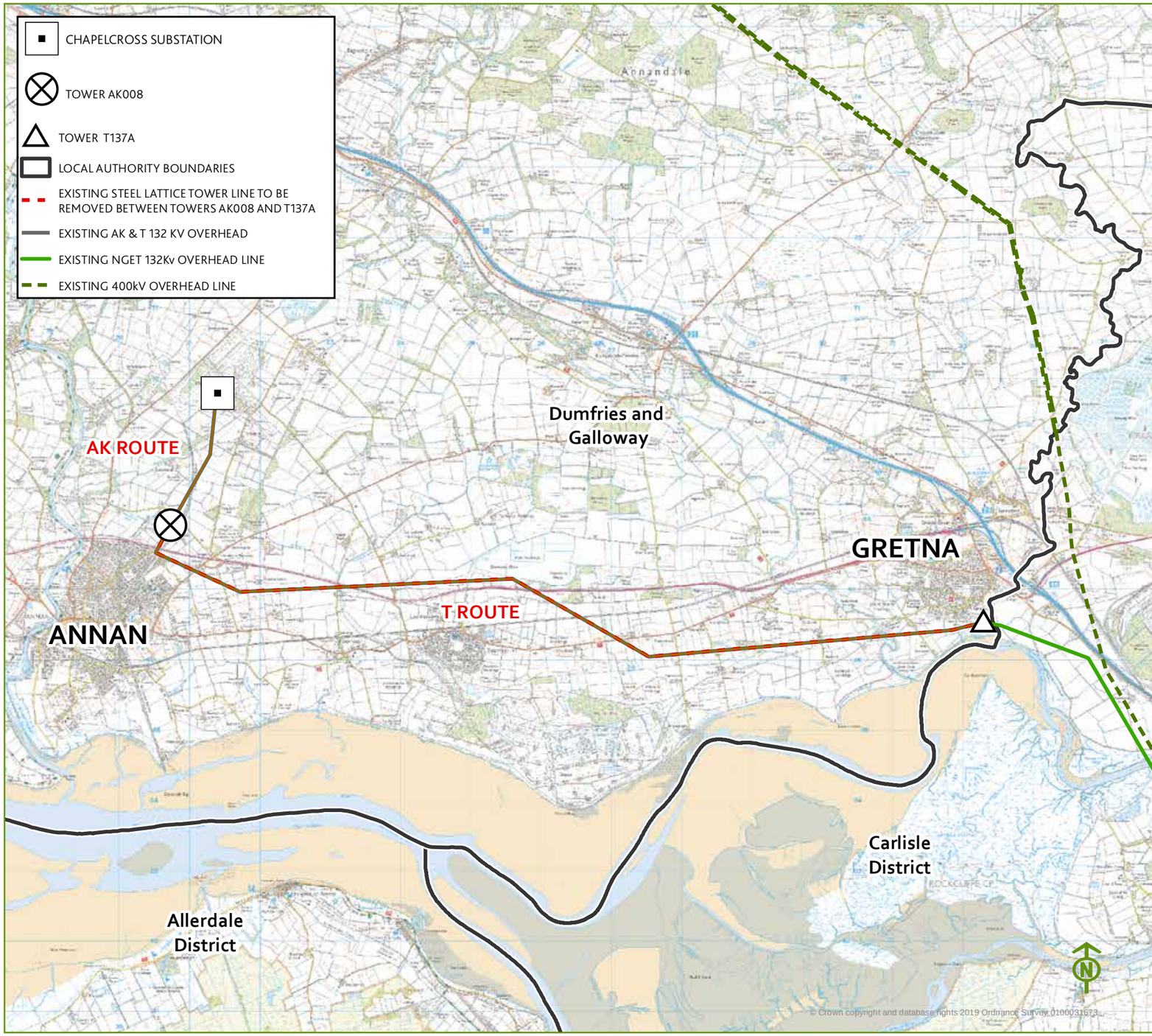


Figure 1: The existing AK and T Route Overhead Lines

03 NEED FOR THE PROJECT

WHY IS THE WORK NECESSARY?

The existing electricity transmission network in Dumfries and Galloway was developed between the 1930s and 1970s. As this area of the network is getting older, the need for maintenance work becomes more critical and more difficult, and there is an increased risk from unplanned outages (faults). The existing line is therefore in need of replacement to cope with the additional generation and ensure secure and reliable supplies to existing and future customers.

Towers on the AK Route remain in good condition and can be reused and hence it is proposed to re-conductor the section from Chapelcross substation to a point close to tower AK007 on the AK Route. From here, the route will be rebuilt on wood pole overhead line to Tower T137A in the Solway Firth on the Scotland/ England border.

The rebuild will comprise a new 132kV single circuit wood pole overhead line around 13.5km long. In addition to the removal of tower AK008 on the AK Route, a new terminal tower will also be required at the western end of the route adjacent to the AK Route. Two new towers will be required at the Gretna end of T Route to transition to the NGET connection, one of which will be a tension tower.

Photo 2: Existing steel towers of T Route

ABOUT SP ENERGY NETWORKS

Part of the ScottishPower Group of 'asset-owner' companies who hold the regulated assets and Electricity Transmission and Distribution Licenses of ScottishPower (SPT). SPT takes electricity generated from power stations, windfarms and various other utilities and transports it through the transmission network, which comprises over 4000km of overhead lines and 320km of underground cables. SPT also has 132 grid substations on the transmission network where the high voltage supply is reduced to a lower voltage for distribution to customers. SP Energy Networks operates, maintains and develops the transmission network and substations, ensuring homes and businesses in Southern and Central Scotland stay connected.

SP Energy Networks has a legal duty to keep its network up to date in order to safeguard electricity supplies.

04 UNDERGROUND CABLE CONSIDERATIONS

Statutory obligations and license obligations require SP Energy Networks to balance economic, technical and environmental factors when considering undergrounding. Following a review, the Government, Ofgem and the electricity industry, including SP Energy Networks, consider that, In most cases, an overhead line approach is the preferred method.

Whilst there are specific circumstances in which an undergrounding approach should be considered, underground cables do have several technical, environmental and economic disadvantages including:

- Higher cost to project and ultimately to the consumer and bill payer (broadly 3x that of the equivalent overhead line);
- The physical extent of land required to accommodate cables;
- The fault repair time;
- Difficulties associated with general maintenance;
- Greater ground disturbance from excavating trenches; and
- The restriction of development and some types of planting within the cable corridor.

Photo 3: Construction site - laying underground cable

As a guide, SP Energy Networks would consider undergrounding a line under the following circumstances where no suitable route for an overhead line can be identified:

- Within a National Scenic Area or National Park;
- Within areas of local character and amenity not subject to a landscape or scenic designation which are considered to have no capacity to accommodate an overhead line;
- Where the likely visual impact on residential areas or areas of historic importance or other areas is very significant;
- Where the likely visual impact on a publicly accessible and recognised view or prospect visited and enjoyed by a large number of people is very significant. This could be within an area of importance for its scenic beauty, character, amenity or historical importance, that may include such features as listed buildings and conservation areas;
- Where from a review of the relevant environmental information it is concluded that the combination of likely adverse effects is very significant and that this cannot be satisfactorily avoided, reduced or offset; and/ or
- Where technical and/ or environmental constraints are such that no suitable overhead line route can be identified.

For the purposes of routeing the intention is to find an acceptable overhead line route. Consideration will only be given to undergrounding should one of the above situations arise.

05 UNDERGROND CABLE CONSTRUCTION

UNDERGROUND CABLE CONSTRUCTION

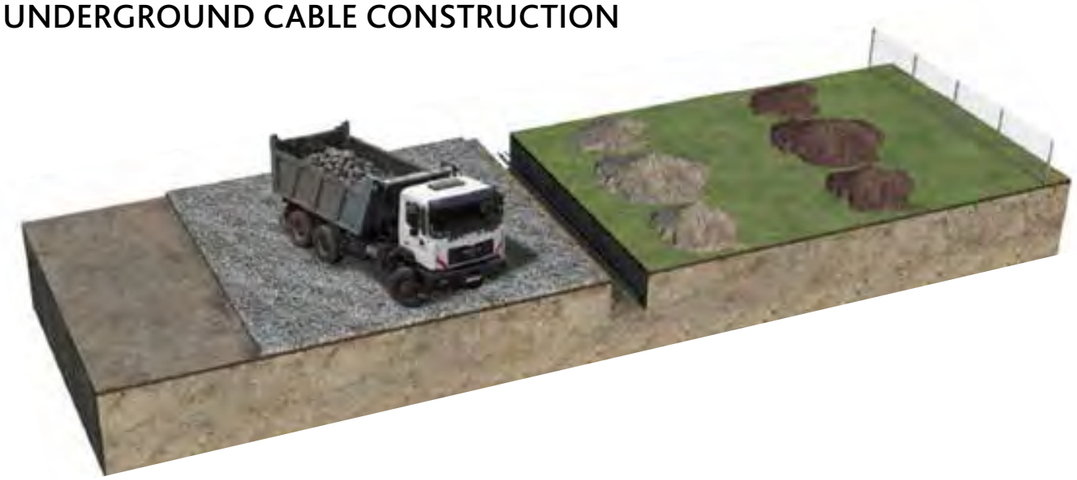


Figure 2 Construction of a 132kV line using underground cable

Typically, undergrounding of 132kV cables is by means of an open cut trench. Horizontal directional drilling is used as an alternative to this where a watercourse or road is crossed.

With an underground cable, the conductors are encased in insulated material and buried in a backfilled trench. A typical 132kV underground cable would require a number of cables laid in 200mm diameter ducts at an approximate depth of 1.4m. A permanent operational corridor, 10m wide, is required to accommodate this and an additional working area of similar width is needed during the construction. The 10m wide operational corridor would be secured by a servitude agreement with the landowner. It would become sterilised land for the lifetime of the underground cable, restricting anything being built or planted upon it which might prevent access to the cable.

Manhole covers at intervals of 500-600m enable access for routine maintenance along the connection. Where an underground cable section is located between overhead line poles, there would need to be terminal support poles which tend to be more visually intrusive.

06 WHAT WILL THE NEW INFRASTRUCTURE LOOK LIKE?

WOOD POLES

The new wood pole support structures will be mainly single poles of the 'trident' design (*Photo 4*). There will be two double pole structures (known as 'H pole' - see *Photo 5*) at the east and west ends of the route respectively in order to transition onto the steel lattice towers. Four double (H-poles) will therefore be required in total.

Wood poles are typically 11m to 16m high, but can be taller, for instance at road and rail crossings. Conversely they can be smaller, for instance where the spans are short.

Above-ground height can range between 9.1m and 21.1m, depending on factors such as obstacles and landform. Wood poles only rarely need concrete foundations and so construction methods are less intrusive than with steel infrastructure.

Wood poles have a dark brown appearance, which weathers to a silver/ grey colour over a period of approximately five years following installation. Wood used for the poles is selected from sustainable sources and is seasoned and pressure treated with a prescribed wood preservative.

Photo 4: Typical Trident Wood Pole

Photo 5: Typical H Pole

THREE STEEL LATTICE TOWERS

Three steel lattice towers will be required – two at the eastern end of the route and one at the western end. These will be of a steel lattice construction fabricated from high tensile steel. As the new overhead line will be single circuit, only one side of the tower will carry conductors (wires) as shown in *Photo 6*.

Photo 6:Single Circuit Steel Lattice Tower with conductors only on one side

OVERHEAD LINE SPAN LENGTHS

Spans normally vary from approximately 80 to 100m. Minimum safety clearance must be maintained under the conductors. The clearances are greater over roads.

Taller than standard wood poles are needed in this situation to maintain clearances.

Valleys allow the use of long spans but excessive spans may require the use of angle poles at either end.

A short span at hilltops keeps pole heights down while maintaining clearances. A pole is only used on a summit when unavoidable.

Figure 3: Overhead Line Span Lengths

07 METHODOLOGY

ROUTEING OBJECTIVE

The objective of route selection is to identify a technically feasible and economically viable overhead line route, between AK Route and the license boundary with NGET, which causes the least disturbance to the environment and to people who live, work and enjoy recreation within it and which takes opportunities to achieve no net loss of biodiversity as well as seeking to include biodiversity net gain where possible.

SP Energy Networks has created a method for overhead line routeing within its 'Approach to Routeing and Environmental Assessment' document which aims to carefully plan routes and limit disturbance to people and the environment in accordance with its statutory and licence duties. A reduction in visual intrusion can be achieved by routeing the line to fit the topography, by using landform and trees to provide screening and/ or background, and by routeing the line at a distance from settlements and roads. In addition, a well-routed line takes into account other environmental and technical considerations and avoids, wherever possible, the most sensitive and valued natural and man-made features.

Key features of the approach are that it:

- It is an iterative process;
- Incorporates feedback from stakeholders; and
- Utilises professional judgement and engagement with relevant stakeholders (including local communities) to create a balance between engineering requirements, economic viability, land use and the environment.

The environmental considerations include:

- Landscape and visual amenity;
- Biodiversity and geological conservation (including ornithology, woodlands/ trees and peat);
- Historic environment (including archaeology); and
- Hydrology and soils.

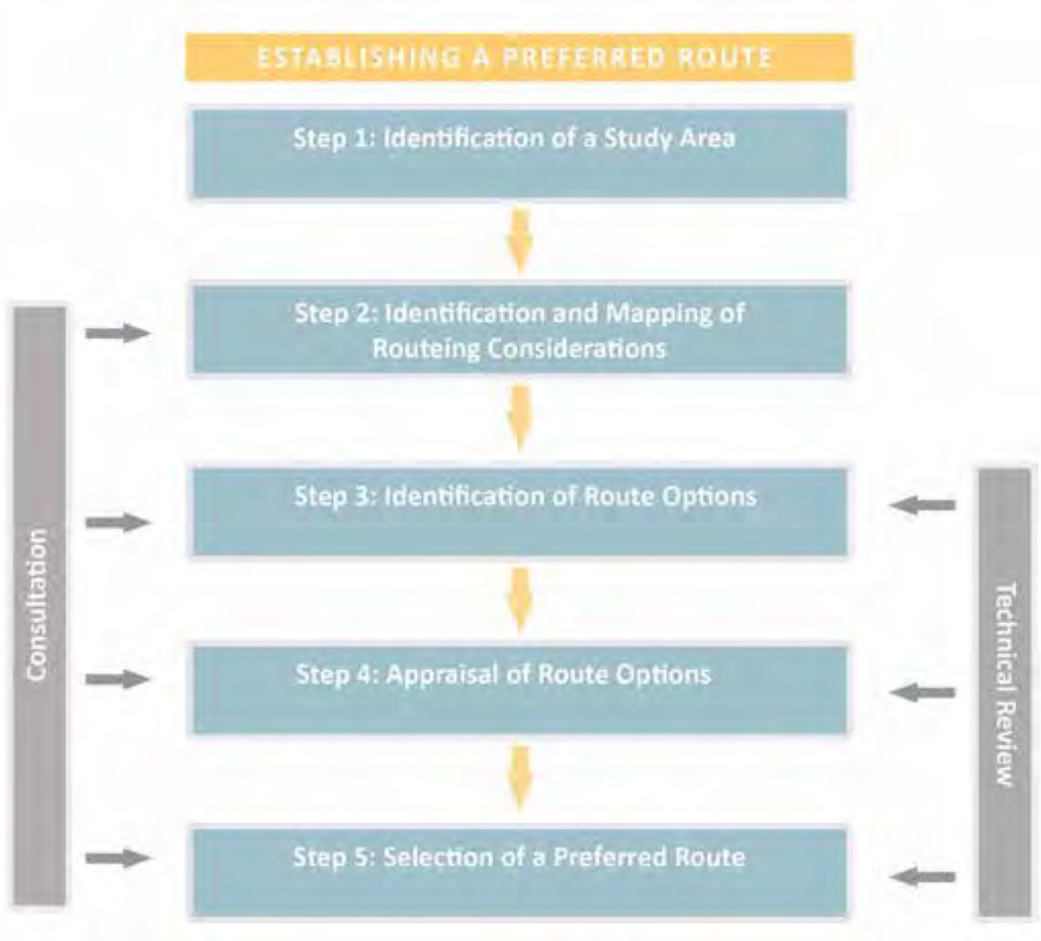


Figure 4 Key Steps in the identification of a preferred route for the T Route Rebuild

The step-by-step process for establishing a route is shown in *Figure 3*. Whilst presented as a linear process for simplicity, the approach is iterative and the steps may be re-visited several times. The outcome of each step is subject to a technical and, where relevant, consultation 'check' with key stakeholders and the public, prior to commencing the next step. Professional judgement is used to establish explicitly the balance between technical, economic and environmental factors.

08 ROUTEING CONSIDERATIONS

Once a routeing study area for the project was established, the main routeing considerations were mapped. This includes areas of highest environmental value, areas of historic interest, topography, landscape character and technical considerations such as slope, altitude and watercourses. This helped establish a number of 'route options' (steps 3 and 4 on *Figure 3*) and as shown on *Figure 4*.

As each route option was developed, its effect on the routeing considerations was recorded and assessed. Route options at this stage could be modified, rejected and re-appraised until the best performing options became apparent.

The main effect of overhead transmission lines is typically visual, whether on the visual component of landscape character or on the visual amenity people experience. The best way to limit adverse effects on landscape and visual amenity is through careful routeing in accordance with the Holford Rules.

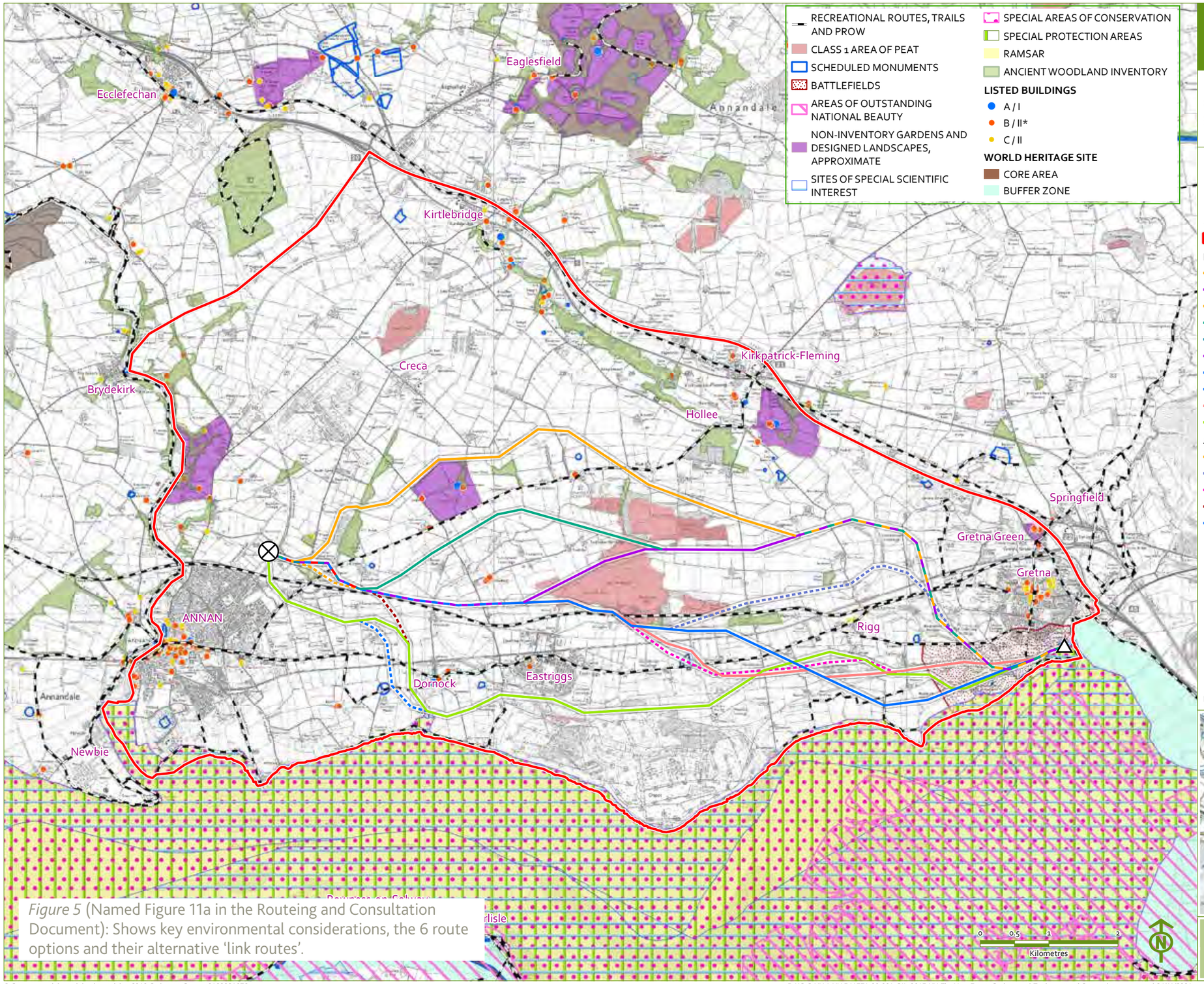
The main routeing objectives (after avoiding, where possible, areas of highest environmental value) were as follows:

- Avoid the higher ground, ridges and skylines;
- Follow the grain of the landscape, running within valleys, in parallel with woodland edges, field boundaries etc. wherever possible;
- Use woodland and topography as a backdrop to the line, or as a foreground screen;
- Minimise the number of crossings of linear features (e.g. roads and rivers), and when appropriate cross at a perpendicular angle;
- Minimise the exposure of the line over prominent ridges and skylines;
- Avoid creating wirescape with existing infrastructure;
- Avoid residential areas as far as practicable, including individual properties which could be adversely affected, particularly by steel towers; and
- Other things being equal, prefer the shortest and/ or most direct alignment.

Six main routes were identified (numbered 1 to 6 from north to south) in addition to a series of alternate links between those routes. The identified routes and links are identified on *Figure 4* and *Figure 5* below.

Photo 7:Existing T Route south of Gretna

09 IDENTIFICATION OF ROUTE OPTIONS



RECREATIONAL ROUTES, TRAILS AND PROW
CLASS 1 AREA OF PEAT
SCHEDULED MONUMENTS
BATTLEFIELDS
AREAS OF OUTSTANDING NATIONAL BEAUTY
NON-INVENTORY GARDENS AND DESIGNED LANDSCAPES, APPROXIMATE
SITES OF SPECIAL SCIENTIFIC INTEREST
SPECIAL AREAS OF CONSERVATION
SPECIAL PROTECTION AREAS
RAMSAR
ANCIENT WOODLAND INVENTORY

LISTED BUILDINGS
A / I
B / II*
C / II

WORLD HERITAGE SITE
CORE AREA
BUFFER ZONE

Figure 5 (Named Figure 11a in the Routeing and Consultation Document): Shows key environmental considerations, the 6 route options and their alternative 'link routes'.

T ROUTE REBUILD

FIGURE 11a
ROUTE OPTIONS AND ENVIRONMENTAL CONSTRAINTS

KEY

TOWER AK008
TOWER T137A
ROUTEING STUDY AREA

ROUTE OPTIONS
1
1+2+3
1+2+3+4+5
2
2+3+4+5
3
3+4
4
5
6

ALTERNATE LINK ROUTES
L1
L2
L3
L4
L5

MAP SCALE AT A3 - 1:50,000

GILLESPIES

SP ENERGY NETWORKS

D:KC C:XX A:XX P11571-00-001-GIL-0615-XX Fig 11a - Route Options and Environmental Constraints_annotated 24/11/2021

10 THE ROUTE OPTIONS

KEY

- TOWER AK008
- TOWER T137A
- ROUTEING STUDY AREA
- 100M CORRIDOR (50M EITHER S OF ROUTE OPTION)

ROUTE OPTIONS

- 1
- 1+2+3
- 1+2+3+4+5
- 2
- 2+3+4+5
- 3
- 3+4
- 4
- 5
- 6

ALTERNATE LINK ROUTES

- L1
- L2
- L3
- L4
- L5

Figure 6: The 6 route options and their alternative 'link routes'.

11 APPRAISAL OF THE ROUTE OPTIONS

Having identified a series of route options, these are then appraised with the objective of examining each route in a comparable, documented and transparent way to identify a preferred route option.

Each route is appraised in terms of the following criteria:

- length of route;
- landscape and visual amenity;
- biodiversity and geological conservation;
- historic environment;
- hydrology and soils; and
- technical constraints.

The appraisal process applied the professional judgement of ecologists, landscape experts and archaeologists to comment on biodiversity, landscape and visual impacts and historic environments respectively. Where expert professional judgement could be supported by data/ information in a quantitative format this was included.

The process sought to continue to reflect the overall routeing objective. It also sought to continue to reflect the Holford Rules, which are the generally accepted industry guidelines for the routeing of overhead transmission lines. The process also sought to draw out the distinctions between the routes to enable the relative strengths and weaknesses of each to be identified.

Photo 8: Routeing considerations included identifying feasible crossing points over the A75 and the Glasgow South Western Line railway.

Photo 9: Routeing considerations included limiting the length of route crossing areas of class 1 peat at Nutberry Moss.

12 SELECTION OF PREFERRED ROUTE

A full evaluation of route options can be found within the Routeing and Consultation Document. In summary, Routes 4, 5 and 6 were discounted on historic environment criteria due to their proximity to Scheduled Monuments or because they crossed more of the site of the Battle of Sark (included within Inventory of Historic Battlefields) than Routes 1, 2 and 3.

Routes 1 and 6, whilst entirely avoiding areas of Class 1 peat at Nutberry Moss, in doing so were the longest and required the most directional changes and so on balance were not preferred.

Route 6 had the most potential impact on residential visual amenity.

Routes 2 and 3 were left remaining as the most viable options having regard for all of the environmental criteria. These two routes were therefore taken forward for further consideration.

On balance, Route 3 was considered preferable. This is because it follows the A75 and the existing T Route for a longer distance and is therefore in a landscape already influenced by infrastructure but which will also benefit from the dismantling of the existing steel lattice line and its replacement with a wood pole line. Route 3 also follows field boundaries more closely as it heads north-east in order to avoid the peat working area at Nutberry Moss. This is in contrast to Route 2 which is required to cross open countryside to the north-west of Nutberry Moss. Route 3 is also further away from properties at this section of the route and therefore less likely to result in significant effects on their visual amenity. Route 3 was therefore recommended as the preferred route and is shown on *Figure 7.* The wider context of the Preferred Route is shown on *Figure 8.*

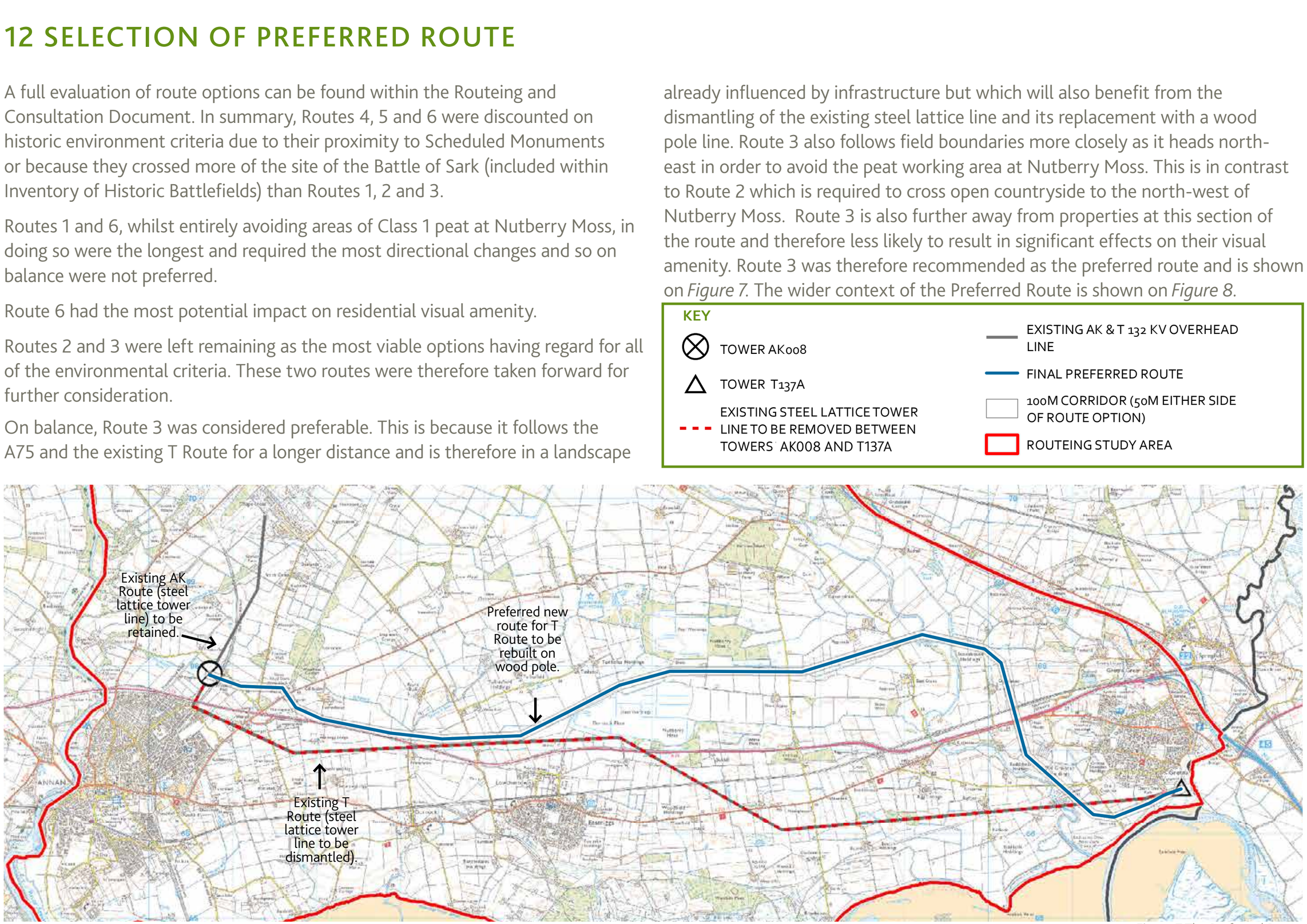


Figure 7 The Preferred Route

13 THE PREFERRED ROUTE

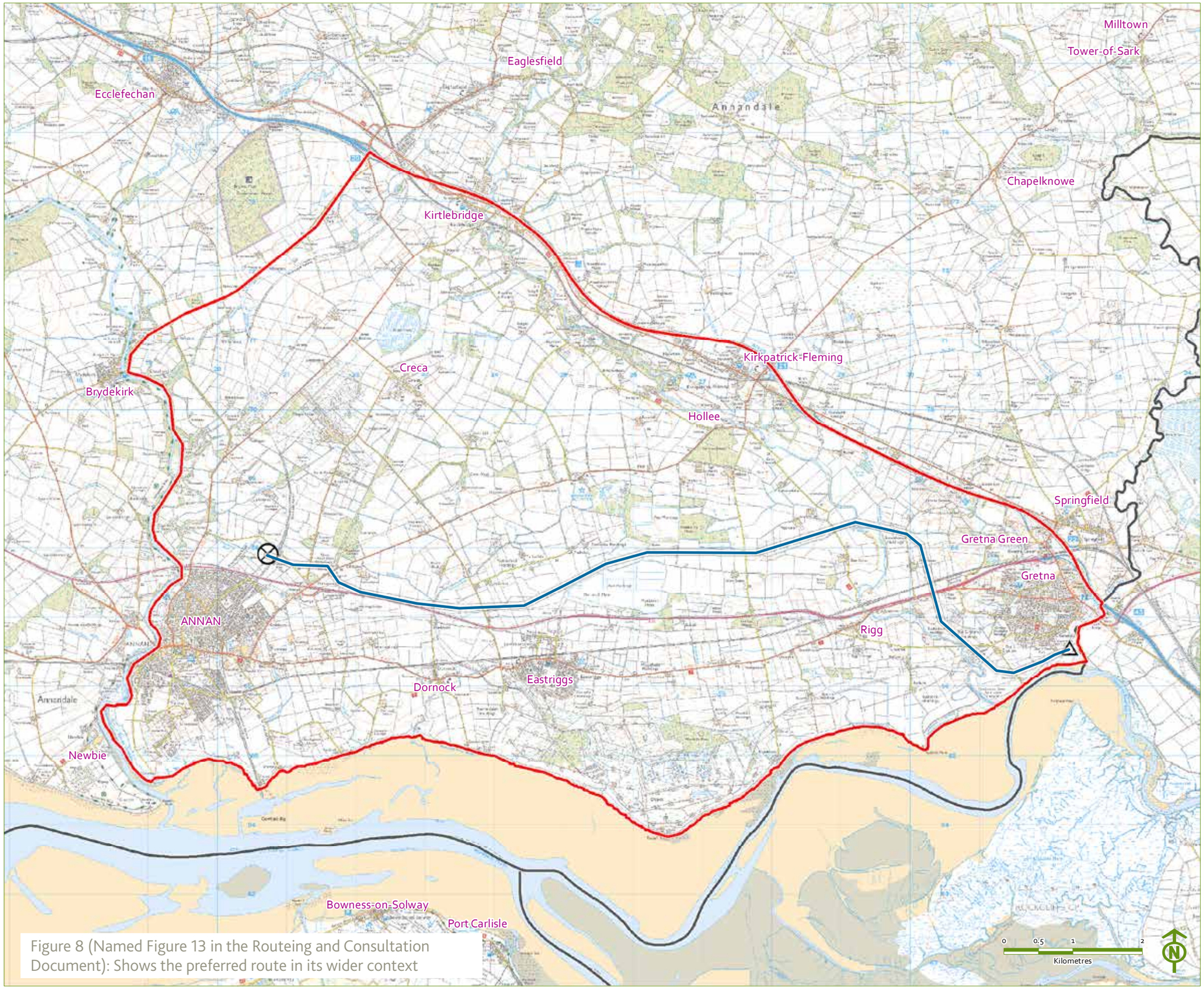


Figure 8 (Named Figure 13 in the Routeing and Consultation Document): Shows the preferred route in its wider context

D:KC C:XX A:XX P11571-00-001-GIL-0613-XX Fig 13 - The Final Preferred Route_no_exist 04/03/2022

T ROUTE REBUILD

FIGURE 13
THE PREFERRED ROUTE

KEY

- TOWER AK008
- TOWER T137A
- THE PREFERRED ROUTE
- 100M CORRIDOR (50M EITHER SIDE OF ROUTE OPTION)
- ROUTEING STUDY AREA
- LOCAL AUTHORITY BOUNDARIES

MAP SCALE AT A3 - 1:50,000

GILLESPIES

SP ENERGY NETWORKS

14 WHAT HAPPENS NEXT?

SP Energy Networks attaches great importance to early engagement with stakeholders and the public in advance of planning applications being made. This is to help it develop its projects in the best way and ensure that all parties with an interest in the T Route Rebuild Project continue to have access to up to date information and are given clear and easy ways in which to shape and inform the proposals as they develop during the pre-application stage.

Stakeholders and the general public will be consulted on both sides of the border - adopting a consistent approach to consultation in both countries to ensure that local communities are treated in the same way, despite the different governing bodies.

The responses received from the consultation process will be considered in combination with the findings of the Routeing and Consultation Document to enable SP Energy Networks to decide on the proposed route to be progressed to the Second Round of consultation and EIA (Environmental Impact Assessment) stage.

'Round Two Public Consultation' on the proposed route and detailed route alignment, is anticipated to be carried out later in 2022/ early 2023.

SP Energy Networks will be required to apply to Scottish Ministers for consent for the T Route Rebuild, in addition to applying for planning permission for the lines and associated works, including the removal of the existing steel lattice tower.

HOW DO I GET IN TOUCH?

The consultation period runs for 30 days between 11th July to 9th August 2022. People can comment in the following ways:

- By post, to the address opposite, allowing 7 days for receipt; and
- By email to TRoute@spenenergynetworks.co.uk.

Project Website:

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

Email us at: TRoute@spenergynetworks.co.uk

Write to us at:

Brendan Tinney
T Route Rebuild
Land and Planning
55 Fullarton Drive
Cambuslang
G32 8FA

As part of the consultation, we would be grateful for your views on the following:

- The preferred route for the connection;
- Any of the alternative route options considered during the routeing process; and
- Any other issues, suggestions or feedback you would like SPEN to consider.

Please note that comments made at this stage are informal and are made to allow SPEN to determine whether changes to the route are necessary. An opportunity to comment formally to the Energy Consents Unit will follow at a later stage in the process following consultation by the Scottish Government once the application is submitted to them. Commenting at this stage does not remove the right or the potential need to comment on the final application once it is made to the Scottish Ministers.

APPENDIX D – Poster

SP ENERGY NETWORKS

T ROUTE REBUILD PROJECT

CONSULTATION INFORMATION

THE CONSULTATION - HAVE YOUR SAY

Due to the age of the overhead line, SP Energy Networks needs to rebuild approximately 13.5km of the existing 132kV, steel tower connection (known as 'T Route'), which currently extends between 'AK Route' north of Annan to the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south east of Gretna.

Usually we would hold public exhibitions and face to face consultation events. Unfortunately, due to the Coronavirus pandemic, temporary regulations have come into effect (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 and The Coronavirus (Scotland) Acts (Amendment of Expiry Dates) Regulations 2022 which means that this is not currently possible.

SP Energy Networks is therefore undertaking a 'virtual consultation' where the consultation material can be viewed online at the website and we would welcome your views. The consultation is running between the 11th July and 9th August 2022. You will find more information and details of how to get in touch below.

Project website :

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

THE PROJECT

There are three main elements to the project which can be seen on Figure 1 below:

- The existing steel lattice tower line forming 'T Route' will be rebuilt as a wood pole line on a different route between a point close to tower AK008 north of Annan and tower T137A, south of Gretna. The towers used will be single trident wood poles with two double 'H poles' required at the east and west ends of the route respectively. A preferred route has been established and is the subject of this consultation.
- Additionally, one new terminal steel lattice tower will be needed adjacent to the AK Route near Annan and two new towers will be required at the NGET boundary south of Gretna.
- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

Existing steel lattice tower line forming the T Route

Single circuit steel lattice tower

Typical Trident single wood pole

Typical double wood 'H Pole'

THE PREFERRED ROUTE

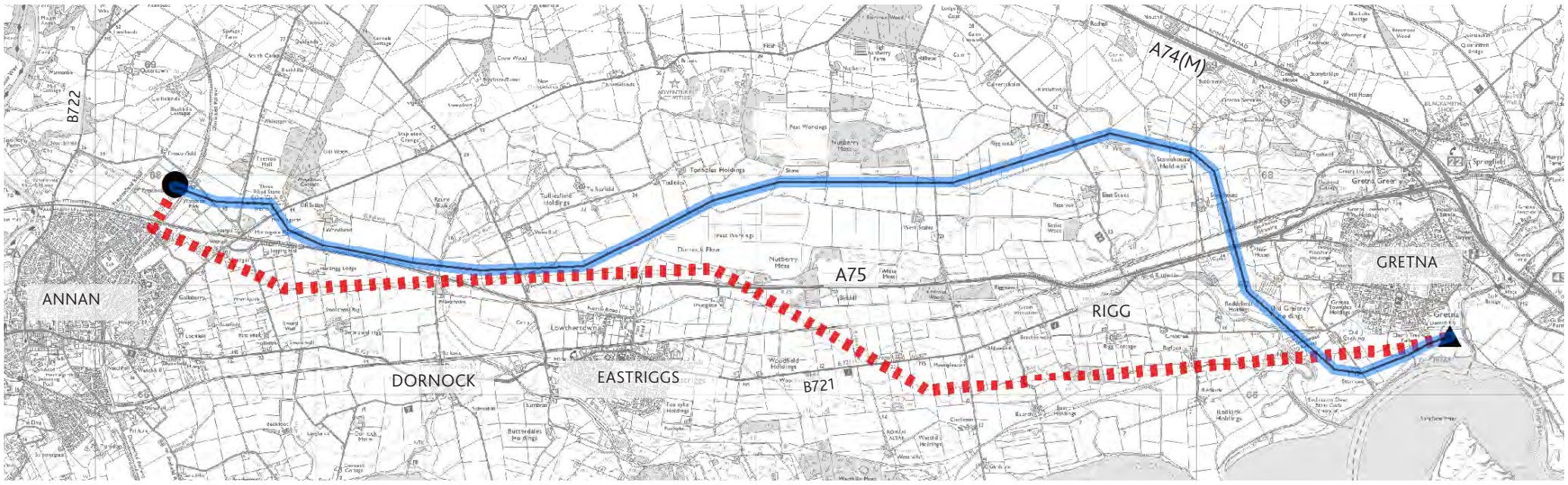


Figure 1 The Preferred Route

KEY

- TOWER AK008
- TOWER T137A
- EXISTING STEEL LATTICE TOWER LINE TO BE REMOVED BETWEEN TOWERS AK008 AND T137A
- PREFERRED ROUTE FOR OVERHEAD LINE USING WOOD POLES. INCLUDES A 50M ALLOWANCE EITHER SIDE TO ALLOW FOR SITING AT DETAILED DESIGN

More details can be found on the project website:

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

Email us at: TRoute@spenergynetworks.co.uk

Write to us: Brendan Tinney
T Route Rebuild
Land and Planning
55 Fullarton Drive
Cambuslang
G32 8FA

APPENDIX E – Community Council Emails

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:28
To: canonbieanddcc@gmail.com
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Carol Midwood,

FAO Canonbie and District community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

To summarise the likely works:

- The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to tower AK008 and tower T137A (please refer to the attached poster which shows the preferred option). The towers used will be single trident wood poles with two double 'H poles' required at the east and west wends of the route respectively. A preferred route has been established and is the subject of this consultation.
- Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK008.
- Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing electric line near tower T137A.
- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a routeing study, assist with consultation and co-ordinate the production of an Environmental Impact Assessment.

The consultation will run for 30 days from the 11th July to the 9th August. The project website can be found at: https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

All the consultation documents can be downloaded from the website, including the Routeing and Consultation Documents (Volume I Main Report and Volume 2 the Technical Appendices and Figures).

We would welcome your consultation responses during the consultation period and would also like to offer a Microsoft Teams call at a time and date of your choosing to allow the community council to ask any questions you might have of the project team. If this is something you would be interested in, please confirm and provide suggested dates and times and we will look to coordinate this.

Contact details for the responses are included at the end of Volume 1 of the Routeing and Consultation Document and are as follows:
Emails address: Troute@spenergynetworks.co.uk

By post to:
Brendan Tinney
T Route Rebuild

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

Please note, it is important that consultation responses to the proposals are made through these channels rather than directly to Gillespies.
Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Regards,
Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:25
To: yvonne.panczak@gmail.com
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Yvonne Panczak,

FAO Cummertrees and Cummertrees West Community Council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

To summarise the likely works:

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Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:33
To: amandatranter@hotmail.co.uk
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Amanda Tranter,

FAO Gretna and Rigg community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

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By post to:
Brendan Tinney
T Route Rebuild

SP Energy Networks,
55 Fullarton Drive, Cambuslang,
Glasgow,

Internal Use

Regards,
Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

Internal Use

Please consider the environment before printing this email.
If you have received this message in error, please notify the sender and immediately delete this message and any attachment hereto and/or copy hereof, as such message contains confidential information intended solely for the individual or entity to whom it is addressed. The use or disclosure of such information to third parties is prohibited by law and may give rise to civil or criminal liability.
The views presented in this message are solely those of the author(s) and do not necessarily represent the opinion of Scottish Power Energy Networks Holdings Ltd. or any company of its group. Neither Scottish Power Energy Networks Holdings Ltd. nor any company of its group guarantees the integrity, security or proper receipt of this message. Likewise, neither Scottish Power Energy Networks Holdings Ltd. nor any company of its group accepts any liability whatsoever for any possible damages arising from, or in connection with, data interception, software viruses or manipulation by third parties.

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:43
To: amanda.craig2@btinternet.com
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Amanda Craig,

FAO Hoddom and Ecclefechan community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

To summarise the likely works:

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Brendan Tinney
T Route Rebuild

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

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Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Regards,
Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:38
To: buckleyellen902@gmail.com
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Mike Buckley,

FAO Kirkpatrick Fleming and District community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

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Regards,
Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:41
To: eiirving44@gmail.com
Cc: Wylie, Colin; Lindsay Robinson
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Dear Elaine Irving,

FAO Kirtle and Eaglesfield community council

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Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Tinney, Brendan <Btinney@spenergynetworks.co.uk>
Sent: 08 July 2022 16:31
To: Wylie, Colin; Lindsay Robinson
Subject: FW: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Poster.pdf

Sorry, didn't CC you.

Internal Use

From: Tinney, Brendan
Sent: 08 July 2022 16:30
To: 'm.stewart703@btinternet.com' <m.stewart703@btinternet.com>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Marion Stewart,

FAO Royal Burgh of Annan community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

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SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

On 8 Jul 2022, at 16:35, Tinney, Brendan <Btinney@spenergynetworks.co.uk> wrote:

Dear Callum Mitchell,

FAO Springfield and Gretna Green community council

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached information poster.

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T Route Rebuild
SP Energy Networks,
55 Fullarton Drive, Cambuslang,
Glasgow,
G32 8FA

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Regards,
Brendan Tinney.

SP ENERGY NETWORKS

Internal Use

APPENDIX F – Consultee Responses

Allerdale

From: Planning Section ABC <planning@allerdale.gov.uk>
Sent: 21 October 2021 10:31
To: Lindsay Robinson
Subject: Automatic reply: T Route Rebuild Project - proposed viewpoint locations for LVIA

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for your email which has been received by Allerdale Borough Council's Development Management Team.

If you are commenting on a planning application please be aware that all representations are made available for public inspection under the provisions of the Access to Information Act 1986. It is our usual practice to publish all comments on the Council's website. This is not a live system therefore your comments will not appear immediately on the website. The submitted details will be forwarded for the attention of the case officer who will, if necessary, contact you if clarity is needed on any of the matters raised.

You can use our website to check the progress of the application and view the Council's decision.

COVID 19 NOTICE

Please be aware that due to COVID-19, I am involved in providing essential services during this unprecedented national situation. During this period we are experiencing significant pressures and need to prioritise services for the most vulnerable in our communities; as such it may take longer for me to respond to any enquiries. Any email enquiries will be prioritised and the most urgent dealt with quickly.

Allerdale Borough Council
Allerdale House, Workington, Cumbria, CA14 3YJ

Follow us on:
Web: https://www.allerdale.gov.uk
Twitter: https://twitter.com/allerdale
Facebook: https://www.facebook.com/Allerdale/

Download our new app, **myAllerdale**, from the Google Play, Apple and Microsoft stores. Report problems, find information and access our services. Or see our website for details: https://www.allerdale.gov.uk/en/contact-us/

BT

From: radionetworkprotection@bt.com
Sent: 05 August 2022 16:06
To: troute@spenergynetworks.co.uk; radionetworkprotection@bt.com
Cc: Lindsay Robinson
Subject: RE: **WID11909** Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Thanks for your reply.

We will reassess o confirm when the co-ordinates are available later in the year.

Thanks

Lisa Smith
Radio Planner
Networks

From: T Route Project <troute@spenergynetworks.co.uk>
Sent: 02 August 2022 13:46
To: radionetworkprotection <radionetworkprotection@bt.com>
Cc: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>; T Route Project <troute@spenergynetworks.co.uk>
Subject: RE: **WID11909** Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

> You don't often get email from troute@spenergynetworks.co.uk. Learn why this is important

Dear Debra,

Thank you for your email. At this stage there are no agreed pole or tower positions, although these will be plotted following conclusion of the public consultation exercise on the preferred route and review of feedback. For information though, as stated in the published Routeing and Consultation Document:

'While Trident wood pole structures have a typical standard height above ground of 11m to 16m (this includes the steel work and insulators to support the conductors or wires), individual pole heights are determined to meet statutory clearance requirements. For example, pole heights may be increased where circumstances dictate, e.g. road and rail crossings. Conversely, pole sizes may be reduced where there are short spans or localised changes in landform. Trident wood poles are typically 10 m – 22m long. ***Once foundation depth (2.5 m) is subtracted and insulator height (1.6 m) included, the range of pole heights above ground is 9.1 m – 21.1 m****.'*

'The section of overhead line between poles is known as the 'span', with the distance between them known as the 'span length'. Span length is dependent on the same criteria as line height. On average, the span length for wood pole lines is 80 – 110m.'

'Tower height is used to regulate the statutory clearances required for conductor height, which is determined by the voltage of the overhead line (the higher the voltage, the greater the required safety clearance) and the span length required between towers. ***The average height for 132kV towers ranges between 20m and 30m.'***

I hope the above information is of use. A second round of consultation will likely follow later in 2022, primarily as a reporting mechanism on any changes following review of feedback from the first consultation. Pole and tower locations will be shown at this stage and any final comments can be considered at this stage.

Kind regards,
Brendan Tinney.

SP ENERGY NETWORKS

Brendan Tinney | Environmental Planner | Land & Planning
Tel: 0141 614 1629 | Int: 41629 | Mob: 07753 624 975

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 27 July 2022 13:56
To: T Route Project <troute@spenergynetworks.co.uk>
Subject: FW: **WID11909** Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Hi Brendan

Please see below consultation response received from BT. Can I leave you to reply?

Kind regards

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

From: radionetworkprotection@bt.com <radionetworkprotection@bt.com>
Sent: 27 July 2022 13:44
To: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Cc: radionetworkprotection@bt.com
Subject: **WID11909** Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

BT BEYOND LIMITS

OUR REF: WID11909

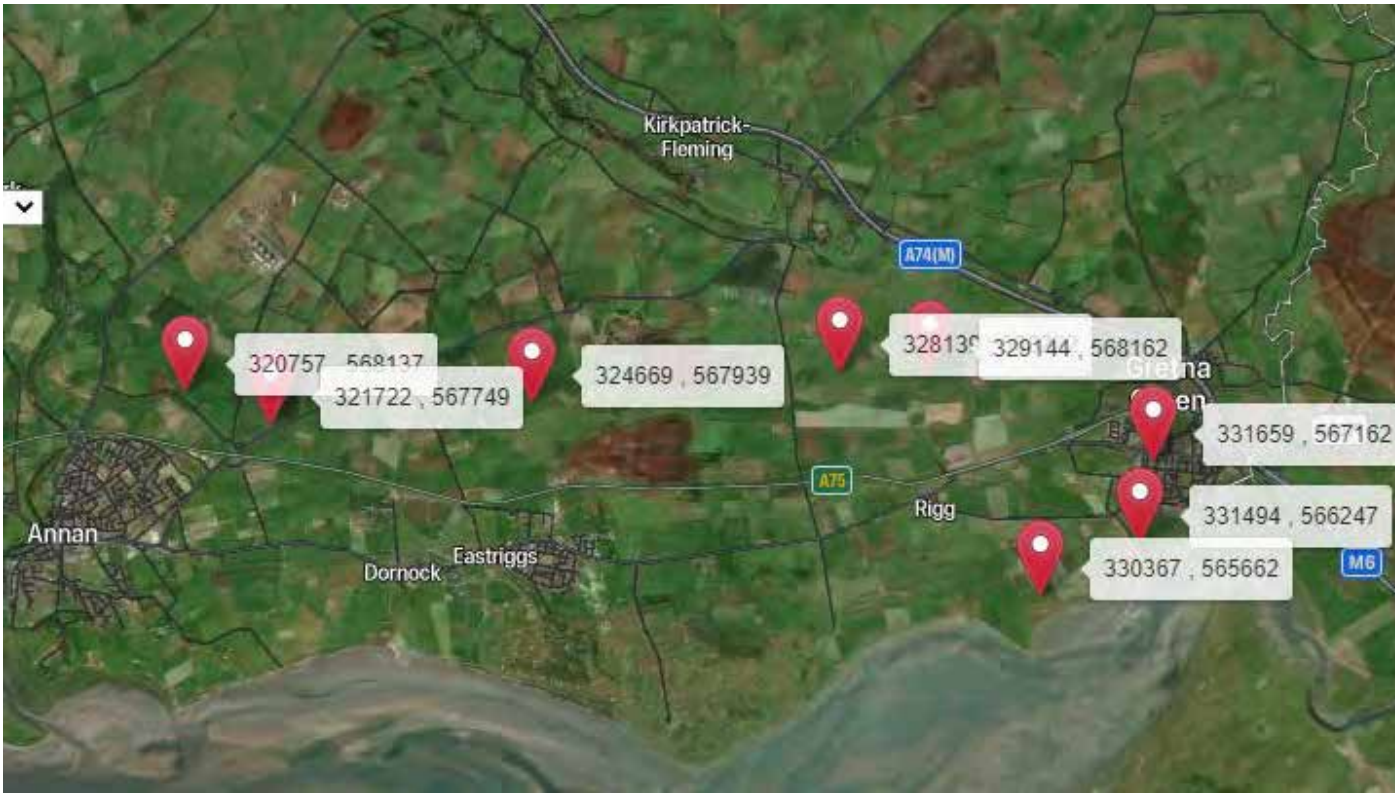
Thank you for your email dated 11/07/2022.

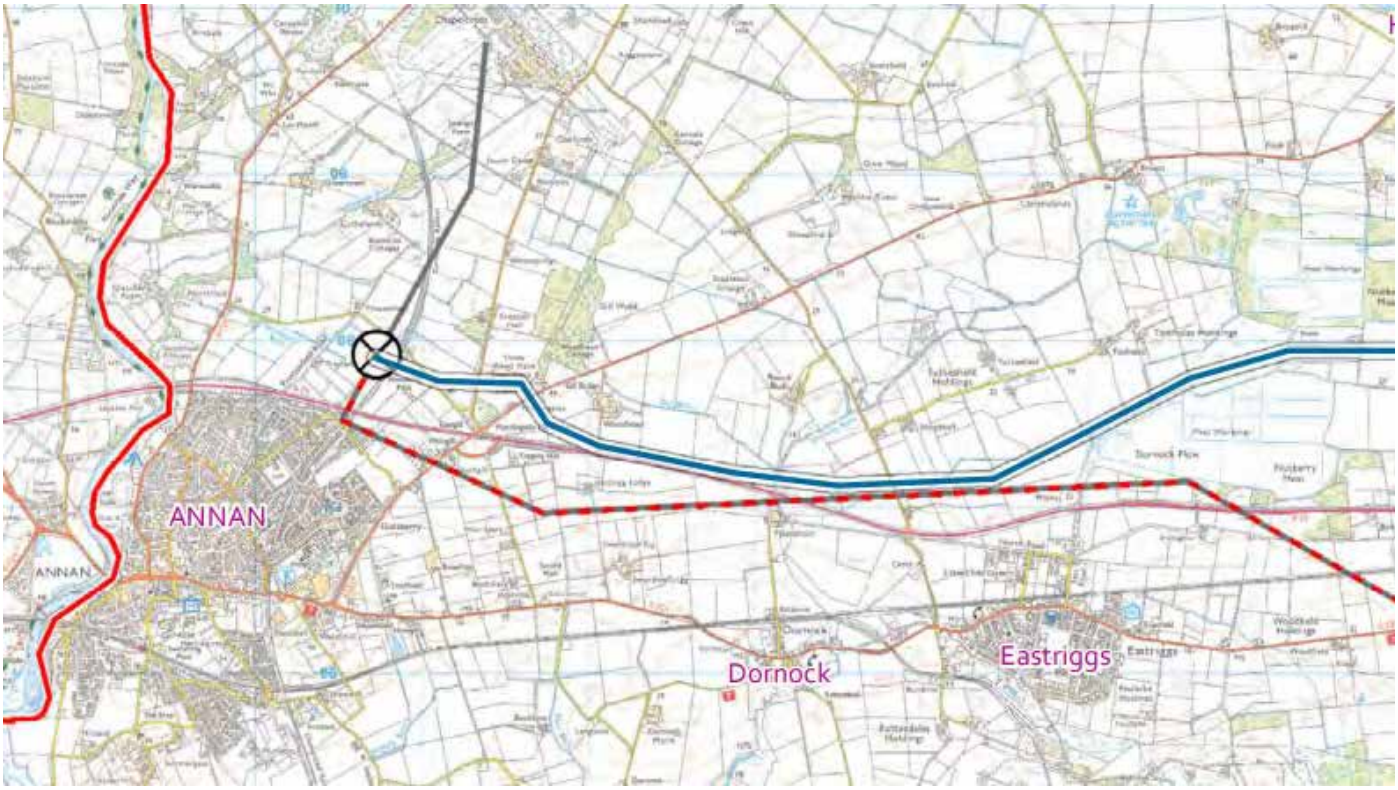
We have studied this OHL proposal to rebuild approximately 13.5km of the existing 132kV overhead line (T Route) using the co-ordinates listed below taken from the T-Route Rebuild Preferred Route option with respect to EMC and related problems to BT point-to-point microwave radio links.

The initial review is that the Project indicated should not cause interference to BT's current and presently planned radio network.

Area covered includes:
320757, 568137
324669, 567939
328139, 568222
329144, 568162
331659, 567162
331494, 566247
330367, 565662
321722, 567749

Please confirm exact location co-ordinates for structures at height so that we can provide a more accurate response if required as the co-ordinates shown have been mapped to show area coverage.


Kirkpatrick-
Fleming
A74(M)
320757 , 568137
321722 , 567749
324669 , 567939
328139
329144 , 568162
331659 , 567162
331494 , 566247
330367 , 565662
A75
Rigg
Annan
Dornock
Eastriggs
M6



Please direct all queries to radionetworkprotection@bt.com

Debra Baldwin
Radio Planner
Networks - Engineering Services Radio Planning

T: +44 331 6241096
M: +44 7483 912588

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 13:25
To: radionetworkprotection <radionetworkprotection@bt.com>
Subject: **WID11909** Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

> You don't often get email from lindsay.robinson@gillespies.co.uk. Learn why this is important

Dear Sir/ Madam

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intend the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently exte Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, so *Route Re-build_The Preferred Route_July 2022*

To summarise the likely works:

- The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to plan for details which shows a preferred option). The towers used will be single trident wood poles with two double 'H poles respectively. A preferred route has been established and is the subject of this consultation.

- Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK0

- Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing elec

- The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and th replacement overhead line.

To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a ro production of an Environmental Impact Assessment.

The consultation will run for 30 days from the **11th July** to the **9th August** The project website can be found at https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

All the consultation documents can be downloaded from the website, including the Routeing and Consultation Documents (Volume I Main Report and Volume 2 the Technical Appendices and Figures).

We would welcome your consultation responses during the consultation period. Contact details for the responses are included at the end of Volume 1 of the Routeing and Consultation Document and are as follows:

Emails address: Troute@spenergynetworks.co.uk

By post to:
Brendan Tinney
T Route Rebuild
SP Energy Networks,
55 Fullarton Drive, Cambuslang,
Glasgow,
G32 8FA

Please note, it is important that consultation responses to the proposals are made through these channels rather than directly to Gillespies.

Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Yours faithfully

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

Environment Agency

From: Enquiries, Unit <enquiries@environment-agency.gov.uk>
Sent: 21 July 2022 12:40
To: Lindsay Robinson
Subject: 220721/SW02 RE: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Good afternoon Lindsay,

Your project appears to be in Scotland which is covered by the Scottish Envirnmental Protection Agency.

The EA only deal with matters in England.

Kind Regards

Steve Whittingslow

Customer Service Adviser
National Customer Contact Centre - Part of National Operations Services
Environment Agency

☎ Tel: 03708 506 506
💻 Web Site: www.gov.uk/environment-agency

So how did we do...?

Our National Customer Contact Centre relies on customer feedback, so we really value your thoughts on how we are doing. We will always make changes where we can to improve our service. This will only take three minutes to complete:

http://www.smartsurvey.co.uk/s/NCCCcustomer/

Click an icon to keep in touch with us:-

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 11:57
To: Enquiries, Unit <enquiries@environment-agency.gov.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

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GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

Forestry and Land Scotland

From: Emma.Kidston@forestryandland.gov.scot
Sent: 26 July 2022 15:58
To: Lindsay Robinson; Julie.Maxwell@forestryandland.gov.scot
Subject: RE: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Hi Lindsay,

Thanks for your email.

Having reviewed the attached plan, it appears that neither the existing or the proposed T Route overhead lines are located on land owned by Forestry and Land Scotland (The Scottish Ministers).

If you have any queries in relation to this, please do not hesitate to contact me.

Kind regards,

Emma Kidston | Forest Liaison Officer - Estates
Forestry and Land Scotland, South Region, Weavers Court, Forest Mill, Selkirk, TD7 5NY
m: +44 (0) 7780004293 **e:** emma.kidston@forestryandland.gov.scot

Upcoming Planned Leave: 6th - 22nd August

Forestry and Land Scotland | Coillteachd agus Fearann Alba

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 13:34
To: Kidston E (Emma) <Emma.Kidston@forestryandland.gov.scot>; Maxwell J (Julie) <Julie.Maxwell@forestryandland.gov.scot>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Emma, Julie

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Yours faithfully

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Office 0113 2470550

Please note that I work part time Wednesday to Friday.

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www.gillespies.co.uk

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to:
Troute@spenergynetworks.co.uk

Brendan Tinney
T Route Rebuild
SP Energy Networks (Glasgow)

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

sarah.hannon-bland@hes.scot
T: 0131 668 858

Our case ID: 300059635

09 August 2022

Dear Brendan Tinney

The Electricity Act 1989, Section 37 Application
Removal of steel tower overhead line and replacement wood pole overhead line, between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A

Thank you for your email of 11 July 2022, which invited our pre-application comments on the above project. This letter contains our comments for our historic environment interests. Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and historic battlefields in their respective inventories.

Dumfries and Galloway archaeology and conservation services will also be able to offer advice on matters including unscheduled archaeology and category B and C-listed buildings.

Proposed Development
We understand that you are inviting us to comment on the proposals by SP Transmission plc (on behalf of SP Energy Networks), on route options for a replacement 132kV transmission overhead line (OHL) of approximately 13.5km (T Route), between Tower T137A south of Gretna, and Tower No 8 (AK008) on the AK Route, north of Annan.

We understand that the new OHL will consist of wood pole support structures of the 'Trident' design with a UPAS conductor and fibre optic cable which will be single wood poles, except at the ends of the route where two H-poles will be required to transition into the steel lattice towers. Two new steel lattice towers are understood to be proposed at the eastern end of the scheme near Gretna and one is proposed north of Annan. Following this, the existing steel lattice tower line from T093 to T137A, and Tower AK08 will be decommissioned and removed.

The works will involve excavation for wood pole and steel lattice tower foundations, construction of temporary access tracks, watercourse crossings, temporary construction compounds/laydown areas, hardstanding working areas at wood poles/towers, widening of existing routes and tree felling. The methodology for decommissioning is also proposed to include excavation of existing lattice tower foundations to a minimum depth of 1m.

We note that the project is still at an early stage and that detailed assessments of the routes and environmental constraints have not yet been carried out. We have reviewed the proposed route options provided against our remit and have provided comments on each of the route options in the attached annex. At this stage our comments are necessarily provisional, and we would welcome the opportunity to provide further detailed advice as the project progresses.

We hope that you find this response helpful, please do not hesitate to contact us if you wish to discuss any aspect in further detail at any point. The officer managing this case is Sarah Hannon-Bland and she can be contacted by phone on 0131 668 8873 or by email on sarah.hannon-bland@hes.scot.

Yours sincerely

Historic Environment Scotland

Annex

General comments
We have reviewed the consultation documents and supporting information provided. Our comments below have identified the assets within our remit which appear most likely to receive impacts from the Preferred Route and alternative routes.

Inventory Battlefields

- Battle Of Sark (BTL 40)

The existing OHL passes through this Inventory historic battlefield. It enters the east edge of the battlefield near the north bank of the River Esk, where Northumberland's forces were recorded to have been pushed back into the high tide and drowned. The route continues west across the flat, low-lying ground between the River Sark and the Kirtle Water, north of the Lochmaben Stone (SM 3378) and English encampment, and through the fields around Old Graitney where much of the fighting occurred. The OHL then crosses the Kirtle Water and field west of the watercourse, across which English troops attempted to flee, and here associated archaeological remains may be buried within or under alluvial flood deposits from the River Esk.

All proposed route options will pass through this Inventory battlefield. As set out in the HES Managing Change guidance on Historic Battlefields, we would expect the consultants to follow a three-stage process for assessing impacts:

(1) identify the current baseline
(2) assess how the site will be affected by the proposed development
(3) identify ways to avoid, reduce or compensate for negative impacts

To be in line with national planning policy, any adverse impacts on Inventory historic battlefields should be minimised. The main impacts from the proposals are likely to be direct, for example, alteration to the special qualities of the battlefield, such as damage to archaeological or other physical remains or features. The assessment should consider the archaeological significance of any area where ground disturbance is likely in relation to the overall battlefield. If the level of impact cannot be identified from desk-based assessment, the developer should ensure that this is assessed through appropriate survey or evaluation. If mitigation is required to address impacts, appropriate survey, excavation or recording should be proposed.

The developer should consult Dumfries and Galloway archaeological advisors about the details of any evaluation or mitigation fieldwork that may be necessary to define/protect/record remains relating to the Inventory battlefield.

Potential direct impacts
There are a number of historic environment assets in the vicinity of the proposed development which have been designated as being of national importance. We have provided further information regarding these assets, potential impacts, and mitigation below.

Scheduled monuments are protected under the Ancient Monuments and Archaeological Areas Act 1979 and in light of this, all works associated with the proposal must avoid direct impacts on these sites and contractors involved in the works should be made aware of this.

Potential impacts on the setting of assets
Potential impacts on the setting of heritage assets should be assessed using our Managing Change guidance note on Setting and any adverse impacts should be mitigated in line with that guidance. Mitigation measures to avoid or reduce impacts could include considering how to reduce the visual impact of the OHL towers by locating OHL towers sensitively and re-locating them, where necessary, away from heritage assets.

Specific comments on the proposed routes

Preferred Route
There are no scheduled monuments located within the route corridor, however there are a number of monuments in the vicinity of this route option:

- **Lochmaben Stone,Standing Stone & Stone (SM 3378**) is located on the edge of a raised area of sands and gravels at the confluence of the River Esk, Sark and Kirtle Water. This glacial erratic was used in the medieval period as a meeting place and border marker in the Scottish Marches and is associated with the Battle of Sark (BTL 40). The stone is also thought to have formerly been part of a prehistoric stone circle, and its site has expansive views to the south and south-west from the site out across the channel of the River Esk and Solway Firth which forms an important part of its setting and significance. The existing OHL can be seen in views to the north from this asset. The Preferred Route corridor may appear less prominent in views towards this monument from the south and removal of the existing OHL may have a positive impact on the setting of this monument.

- **Redkirkmill, Enclosure 50m Wsw Of (SM 12086)** is located on low-lying land to the south-west of the Kirtle Water and to the north of the existing OHL. This settlement enclosure, likely to be Iron Age in date, survives largely as below-ground remains but in part as a slight earthwork. The existing OHL can be seen in

views to the south from this asset towards the Solway Firth. The Preferred Route corridor would move the OHL out of these views to the south and away to the north-east, which may have a positive impact on the setting of this monument.

- **The Bracken, Enclosed Settlement And Droveway 370m Wsw Of (SM 11994)** is located on a low ridge of a south-west facing slope above the former river floodplain of the Kirtle Water. This enclosed settlement and ditched droveway of probable Iron Age date survives both as below-ground remains and as two substantial earth and stone banks with separating ditch and entranceways. Evidence of Neolithic and Bronze Age activity has also been recorded on this site which indicates the location has long been an important and persistent place for human settlement activity. The site occupies a prominent position with wide views to the south and west which contribute to the understanding and appreciation of this monument as a defended settlement with views along the river valley and towards the Solway Firth.

  The setting of the monument includes another existing lattice tower OHL to the north-west in views west along the droveway line and Kirtle Water. The Preferred Route corridor will introduce new infrastructure into views to the south from the monument within the flat open landscape, crossing this view to almost meet the existing OHL in the west. The cable and wood pole towers are likely to be visible in outward views from the monument looking towards the Solway Firth and across to Kirtle Water. The proposed OHL will have an adverse impact on the monument's setting as it will impact upon the immediate character of the landscape, however, we are content that the severity of this impact is not such that it raises issues of national importance.

- **Calvertsholm, Settlement 110m N Of (SM 12128)** is located to the west of Kirtle Water in a low-lying situation close to the river. The monument comprises an enclosed settlement and associated droveway, likely of Iron Age date. Just to the north are two prehistoric burial cairns at Calvertsholm Cottages (SM 11947 and SM 11950) and the associated settlement droveway passes the cairn (SM 11947) and appears to respect the earlier burial monument. The key elements of the setting of the settlement comprise the flat open former river floodplain which provides fertile agricultural land for the former settlement and existing farm, and the burial cairns on raised ground to the north. Views to the south of this monument take in an existing OHL and the proposed OHL route would be located to the south of this, therefore due to the distance of the proposed new OHL and the presence of existing infrastructure, it is unlikely that a replacement OHL within this corridor would raise issues of national interest for the setting of this monument.

- **Calvertsholm Cottages, Cairn 315m Wnw Of (SM 11947)** and **Calvertsholm Cottages, Cairn 320m Nnw Of (SM 11950)** are located on an area of raised ground overlooking the Kirtle Water to the east, with some longer distance views south towards the Solway Firth. These burial monuments likely date to the Early Bronze Age and form part of group of monuments in the area along the Kirtle Water. Views to the south of this monument take in an existing OHL and the proposed OHL route would be located to the south of this, therefore due to the distance of the proposed new OHL from these monuments and the presence of existing infrastructure, it is also unlikely that a replacement OHL within this corridor would raise issues of national interest for the setting of these monuments.

- **Broats, enclosure 250m N of (SM 4087)** is located on the lower slopes of a small hill east of the Dornock Burn, overlooking low-lying land with long distance views towards the Solway Firth. This settlement enclosure, likely to be Iron Age in date, survives largely as below-ground remains but in part as a slight earthwork. The site is presently crossed by another existing lattice tower OHL and the field in which is it located is enclosed by trees and hedgerow. The existing lattice tower OHL and two other existing wood pole OHL routes appear in longer views south towards the Solway Firth, therefore it is considered however that the level of impact to the setting of this monument would be similar to baseline conditions, following decommission and removal of the existing lattice tower OHL. Therefore, it is unlikely that a replacement OHL within this corridor would raise issues of national interest for the setting of this monument

- **Woodhead, Enclosure 200m Ne Of (SM 4090)** is located to the north of the farmstead of Woodhead on a slope above the Gill Burn. The enclosure is likely of prehistoric date and survives as below-ground remains. The site has clear views south towards the Solway Firth and the existing OHL can be seen in longer views to the south. The proposed route corridor will bring the new OHL closer to the monument along the line of the existing A75 road embankment to the south. It is considered however that the level of impact to the setting of this monument would be similar to baseline conditions. Therefore, it is unlikely that a replacement OHL within this corridor would raise issues of national interest for the setting of this monument.

<u>Routes 1 and 2</u>
This route follows the Preferred Route in the east, however there are several scheduled monuments in closer proximity to this route corridor. Impacts on their setting should be assessed and mitigation considered:

- Calvertsholm, Settlement 110m N Of (SM 12128)
- Calvertsholm Cottages, Cairn 315m Wnw Of (SM 11947)

- Calvertsholm Cottages, Cairn 320m Nnw Of (SM 11950
- Broats, enclosure 250m N of (SM 4087)
- Woodfield, Enclosure 295m Ne Of (SM 12029)
- Woodhead, Enclosure 200m Ne Of (SM 4090)

There is also the potential for impacts on the setting of **Stapleton Tower (LB 3782)** to the south of Route 1. These impacts should be assessed, and mitigation considered.

Route 3

- This is the Preferred Route. Please see the comments previously provided.

Route 4

- **Lochmaben Stone, Standing Stone & Stone (SM 3378)** is located in close proximity to this route option which crosses the Battle of Sark (BTL 40) just north of this scheduled monument. Any assessment should consider the potential impact on views towards the OHL, as well as views towards the monument with the OHL appearing in the same view.

- The scheduled monuments known as **Woodfield, Enclosure 295m Ne Of (SM 12029)** and **Woodhead, Enclosure 200m Ne Of (SM 4090)** are located in the vicinity of this route corridor. Impacts on their setting should be assessed and mitigation considered.

Route 5

- This route corridor largely follows the existing OHL, including to the north-east of the scheduled monument known as **Woodfield, Enclosure 295m Ne Of (SM 12029)**, where the route deviates slightly to accommodate the scheduled area. Direct impacts on the monument must be avoided and impacts on its setting should be assessed and mitigation considered.

- **Woodhead, Enclosure 200m Ne Of (SM 4090)** is located in the vicinity of this route corridor. Impacts on its setting should be assessed and mitigation considered.

Route 6

- **Lochmaben Stone, Standing Stone & Stone (SM 3378)** is located in close proximity to this route option which crosses the Battle of Sark (BTL 40) just north of this scheduled monument. Any assessment should consider the potential

impact on views towards the OHL, as well as views towards the monument with the OHL appearing in the same view.

- **Westhills, Altar Stone 35m N Of (SM 11980)** is located in the vicinity of this route option. It comprises a Roman altar stone occupying a locally prominent position, which overlooks the eastern Solway Firth. Impacts on its setting should be assessed and mitigation considered.

- The scheduled monuments known as **Burnbrae, enclosure 270m W of (SM 12189)** and **Gleningle, enclosure 80m NE of (SM 12001)** are located in the vicinity of this route corridor. These assets are settlement enclosures, likely to be Iron Age in date, and survive as below-ground remains situated on areas of slightly raised ground with views to the south towards the Solway Firth. This route corridor would be located to the south of SM 12189 and east of SM 12001. Impacts on their setting should be assessed and mitigation considered.

- There is also the potential for impacts on the setting **of Dornock Village, Dornock House, Old Farmhouse and Steading, Including Detached Tall West Block (LB 3792)** to the south of this route corridor. These impacts should be assessed, and mitigation considered.

Mitigation
If the Preferred Route is progressed, then mitigation by design will be required to ensure that the impacts on the setting of scheduled monuments are no worse than the impacts resulting from the current OHL. Mitigation to reduce impacts on the Battle of Sark (BTL 40) may also be necessary, due to machine movement, watercourse crossings, access tracks and works to tower foundations.

There may be potential for direct impacts on monuments, in particular Woodfield, Enclosure 295m Ne Of (SM 12029), during the construction and use of temporary access tracks. The monument should be marked out and signposted to protect the scheduled area from accidental damage during any access track construction and decommissioning works. Given that the site of the existing lattice tower north-east of SM 12029 is located less than 30m from the scheduled area, additional fencing (such as Heras fencing) may help protect the monument during any decommissioning works, including excavation around the concrete lattice tower foundations. The tower must be felled outside and away from the scheduled area. All workers in the area should also be briefed about the presence, sensitivity, and legal protection of the monument (SM 12029).

We would be happy to discuss potential mitigation options as the development progresses and recommend that further discussion with ourselves is carried out as early as possible to allow us to provide constructive advice at a useful stage in the process.

Summary
Overall, we consider that Preferred Route option (Route 3) raises the least concern for our interests. The potential for impacts on the setting of scheduled monuments should be addressed during the assessment, scheme design, and consideration of any necessary mitigation.

Routes 1, 2, and 6 have greater potential for adverse impacts on the setting of more scheduled monuments than Route 3.

Routes 4 and 5 have greater potential for adverse impacts on the setting of scheduled monuments, due to the close proximity of Lochmaben Stone, Standing Stone & Stone (SM 3378) to Route 4 and Woodfield, Enclosure 295m Ne Of (SM 12029), to Route 5.

We recommend that further consultation is undertaken with us to discuss the potential effects of the proposals and potential mitigation for those impacts as the design of the project progresses.

Historic Environment Scotland
09 August 2022

MoD - RAF

From: DES ADEWS-RSP Safeguarding (MULTIUSER) <DESADEWS-RSPSafeguarding@mod.gov.uk>
Sent: 12 July 2022 14:05
To: Lindsay Robinson
Subject: 20220712-REPLY Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: T_Route_Rebuild_The_Preferred_Route_July_2022.pdf; RE: 20220711-POWERLINE PROPOSAL-Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

OFFICIAL-SENSITIVE

Good Afternoon,

Thank you for supplying the grid references.

The assessor has no concerns with this application.

Regards

Moira

Moira Wilson
RSP Safeguarding
e-mail DESADEWS-RSPSafeguarding(MULTIUSER)@mod.gov.uk
RAF Henlow Tel. 03001514817

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 14:05
To: DES ADEWS-RSP Safeguarding (MULTIUSER) <DESADEWS-RSPSafeguarding@mod.gov.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

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Glasgow,
G32 8FA

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Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Yours faithfully

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

National Trust

From: N.CustomerEnquiries <N.CustomerEnquiries@nationaltrust.org.uk>
Sent: 26 July 2022 09:45
To: Lindsay Robinson
Subject: FW: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Lindsay

We acknowledge receipt of your email below.

With thanks, Jane

Jane Elliott
Business Services Co-ordinator

National Trust
Newcastle Hub
Nationaltrust.org.uk

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 14:24
To: N.CustomerEnquiries <N.CustomerEnquiries@nationaltrust.org.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Sir/ Madam

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intend the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently exte Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, so *Route Re-build_The Preferred Route_July 2022*

To summarise the likely works:

- The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to plan for details which shows a preferred option). The towers used will be single trident wood poles with two double 'H poles respectively. A preferred route has been established and is the subject of this consultation.

- Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK0

- Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing elec

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To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a ro production of an Environmental Impact Assessment.

The consultation will run for 30 days from the **11th July** to the **9th August** The project website can be found at https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

All the consultation documents can be downloaded from the website, including the Routeing and Consultation Documents (Volume I Main Report and Volume 2 the Technical Appendices and Figures).

We would welcome your consultation responses during the consultation period. Contact details for the responses are included at the end of Volume 1 of the Routeing and Consultation Document and are as follows:

Emails address: Troute@spenergynetworks.co.uk

By post to:
Brendan Tinney
T Route Rebuild
SP Energy Networks,
55 Fullarton Drive, Cambuslang,
Glasgow,
G32 8FA

Please note, it is important that consultation responses to the proposals are made through these channels rather
than directly to Gillespies.

Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Yours faithfully

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

Please note that I work part time Wednesday to Friday.

5th Floor, Phoenix House, 3 South Parade, Leeds, LS1 5QX.

www.gillespies.co.uk

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NATS

From: ROSSI, Sacha
To: Troute@spenergynetworks.co.uk
Cc: NATS Safeguarding; Lindsay Robinson
Subject: RE: Consultation for removal of steel tower overhead line and replacement wood pole overhead line. [SG33737]
Date: 21 July 2022 15:23:56
Attachments: image004.png
image005.png

Dear Sirs,

NATS operates no infrastructure in the vicinity of the proposed installation. Accordingly it had no comments to make on the consultation.

Regards
S. Rossi
NATS Safeguarding Office

Sacha Rossi
ATC Systems Safeguarding Engineer

D: 01489 444205

E: sacha.rossi@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NatureScot

From: Michelle Stamp <Michelle.Stamp@nature.scot>
Sent: 22 July 2022 11:47
To: T Route Project <troute@spenergynetworks.co.uk>
Subject: RE: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Lindsay,

Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Thank you for your e-mail of 11 July 2022 seeking clarification of NatureScot's current position on the above development further to our response dated 25 February 2022.

Having reviewed the proposed route drawings we have the following comments to make.

Solway Firth Special Protection Area (SPA)

The proposed overhead line rebuild, at the closest point, would be within approximately 500m of the Solway Firth SPA. The Solway Firth SPA supports a range of non-breeding and migratory bird species, further details of which can be found on the SiteLink section of our website at: https://sitelink.nature.scot/site/10487

The status of the SPA means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Further information on the legislative requirements of European sites can be found at: https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra

Upper Solway Flats and Marshes Site of Special Scientific Interest (SSSI)

The proposed overhead line rebuild, at the closest point, would also be within approximately 400m of the Upper Solway Flats and Marshes SSSI, which is notified for a range of ornithology interests, geology interests, natterjack toads and coastal mudflats, see SiteLink for further details: https://sitelink.nature.scot/site/1583

Our advice is that several of the SSSI bird species could use the arable fields/grassed areas of the proposed rebuild route for roosting/foraging, however it's likely that any negative effects on these birds interests could be avoided by careful timing of construction works to avoid sensitive periods. However, we will be able to advise further once the above recommended ornithology survey work has been completed.

We do not consider that the geology, mudflat or natterjack toad interests of the SSSI will be adversely affected by these proposals.

We note that you have undertaken desk studies to identify areas used by bird species that constitute the qualifying interests of the SPA and that further ornithological field surveys of the preferred route will be undertaken for foraging, roosting and nesting areas within the wider area.
We also note that the preferred route avoids the Solway Firth Goose Management scheme and that woodland was avoided where possible.

We would wish to be advised of any modifications or amendments to this application which may be relevant to our interests.

If you have any queries regarding the above please don't hesitate to get in touch.

Kind Regards

Michelle

Michelle Stamp | Operations Officer - South
NatureScot | Andersons Chambers, Market Street, Galashiels, TD1 3AF | 07901311010
nature.scot | @nature_scot | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

I work Wednesday and Friday

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 10:23
To: SOUTHERN_SCOTLAND <SOUTHERN_SCOTLAND@nature.scot>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Sir/ Madam

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intends to submit an application for consent under section 37 of the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently extends between Tower No 8 (AK008) on the AK Route north of Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, south of Gretna and as shown on the attached plan: *T – Route Re-build_The Preferred Route_July 2022*

To summarise the likely works:

• The existing steel lattice tower line forming the T Route will be rebuilt as a wood pole line between a point close to tower AK008 and tower T137A (please refer to the attached plan for details which shows a preferred option). The towers used will be single trident wood poles with two double 'H poles' required at the east and west ends of the route respectively. A preferred route has been established and is the subject of this consultation.

• Additionally, a new terminal steel lattice tower will be needed adjacent to the AK Route near Annan near tower AK008.

• Two new steel towers will be required at the NGET boundary south of Gretna on the same angle as the existing electric line near tower T137A.

• The existing 132kV steel lattice towers along the redundant section of the route will be dismantled, removed and the ground restored following construction of the replacement overhead line.

To help plan the route of this proposed connection, Gillespies have been appointed by SP Energy Networks to carry out a routeing study, assist with consultation and co-ordinate the production of an Environmental Impact Assessment.

The consultation will run for 30 days from the **11th July** to the **9th August** The project website can be found at https://www.spenergynetworks.co.uk/pages/trouterebuild.aspx

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Please could your organisation acknowledge receipt of this email.

With many thanks for your kind assistance during the consultation period.

Yours faithfully

Lindsay Robinson
Principal Landscape Architect
GILLESPIES LLP

Office 0113 2470550

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www.gillespies.co.uk

Network Rail

From: Cheri Cunningham <Cheri.Cunningham@networkrail.co.uk> on behalf of Asset Protection Scotland <AssetProtectionScotland@networkrail.co.uk>
Sent: 11 August 2022 09:31
To: Lindsay Robinson
Subject: 308: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.
Attachments: Asset Protection Guidance Document v 22.pdf; Development-enquiry-questionnaire.doc

Good Morning Lindsay,

Thanks for contacting Asset Protection Scotland regarding your proposed works. Please accept our sincerest apologies for the delay in getting back to you.

Please note Network Rail have a statutory obligation to ensure the safe availability of train paths and take an active interest in any adjacent operations which may have the potential to impact on the safe operation of the railway. As such, it will be necessary for you/ your contractor to design and carry out works on this site in accordance with Network Rail's attached guidance document "Requirements for Construction Work on or Near Railway Operational Land by Outside Parties".

In order to further assist us with responding specifically to your enquiry can you please complete and return the attached development questionnaire with as much detail as possible.

A member of our team will respond to you directly with advice on the specific requirements needed in relation to your proposed works. We would like to advise that all our departments within Asset Protection are experiencing a large increase in enquiries which is causing a huge back log; your patience is greatly appreciated.

Best Regards,

Cheri Cunningham
Asset Protection Project Management Assistant
Interface – Scotland
151 St Vincent Street, Glasgow G2 5NW

From: Lindsay Robinson <Lindsay.Robinson@gillespies.co.uk>
Sent: 11 July 2022 14:09
To: Asset Protection Scotland <AssetProtectionScotland@networkrail.co.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Sir/ Madam

To comply with the obligations of its transmission licence, SP Transmission plc (SPT), on behalf of SP Energy Networks intend the Electricity Act 1989 to rebuild approximately 13.5km of the existing 132kV overhead line (T Route), which currently exte Annan to Tower T137A at the shared license boundary with National Grid Energy Transmission (NGET) in the Solway Firth, so *Route Re-build_The Preferred Route_July 2022*

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Scottish Government ECU

From: casehandling.service@gov.scot
Sent: 12 July 2022 14:58
To: Lindsay Robinson
Subject: Your Recent Enquiry with Scottish Government and partner agencies

Categories: Filed by Newforma

Our Reference: 202200310817

Dear Lindsay Robinson ,

Thank you for your correspondence sent on 11/07/2022. Your query will be passed to the relevant area for consideration and has been given a reference number of 202200310817. Please quote this number in all correspondence. The Scottish Government aim to respond, where necessary, as quickly as possible and within the stated timescale as indicated on our website (http://www.gov.scot/about/contact-information/how-to-request-information/).

Yours sincerely
MiCase
Correspondence system for SG and partner agencies

The Scottish Government takes your privacy seriously. You may have written to us because you have a question or want to make a complaint. Our privacy notice (https://beta.gov.scot/publications/contacting-the-scottish-government-handling-your-data), available on our website, sets out how we use your personal data, and your rights when communicating with us. It is made under Article 13 of the General Data Protection Regulation (GDPR).

SEPA

From: Planning SW <planning.sw@sepa.org.uk>
Sent: 24 August 2022 11:44
To: T Route Project <troute@spenergynetworks.co.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line - SEPA Response

OFFICIAL

Dear Brendan,

I apologise for the delay in responding. We note that you (SP Energy Networks) propose to undertake an EIA without submitting a screening request. Once this proposal reaches the scoping stage, we will be formally consulted by the Energy Consents Unit in our capacity as an EIA consultation authority. We will provide a tailored response that will help inform the scope of the EIA Report. Our standard responses for certain types of development provide a useful overview of the environmental impacts that may need to be addressed through the EIA process. Whilst we do not have one for energy transmission infrastructure aspects of our response templates for windfarms and hydro schemes are likely to be applicable. These can be accessed at the planning advice for developers section of our website. I trust that these will be of use as you consider emerging route options and locations for substations.

Kind regards,

Jonathan

Jonathan Werritty
Senior Planning Officer / Planning Officer - SW Team
Scottish Environment Protection Agency | Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT

OFFICIAL

West Scotland Archaeology Service

From: O'Hare, Martin (NRS) <Martin.OHare@glasgow.gov.uk>
Sent: 20 July 2022 09:12
To: Lindsay Robinson
Subject: RE: Consultation for removal of steel tower overhead line and replacement wood pole overhead line. (OFFICIAL)

Follow Up Flag: Follow up
Flag Status: Flagged

OFFICIAL

Hello Lindsay,

I was on leave all last week so I don't know whether either Hugh or Paul has replied already. In case they haven't, I'd say that the whole line appears to be in Dumfries and Galloway, which isn't one of our member Councils, and as such, we wouldn't be in a position to comment on the proposal. Instead, you'd need to contact Andy Nicholson, D&G's in-house archaeological advisor.

Regards,

Martin

Martin O'Hare
Historic Environment Records Officer
West of Scotland Archaeology Service
231 George Street, Glasgow, G1 1RX
Tel: 0141 287 8333
email: Martin.O'Hare@wosas.glasgow.gov.uk

From: Lindsay Robinson [mailto:Lindsay.Robinson@gillespies.co.uk]
Sent: 11 July 2022 14:12
To: McBrien, Hugh (NRS) <Hugh.McBrien@glasgow.gov.uk>; Robins, Paul (NRS) <Paul.Robins@glasgow.gov.uk>; O'Hare, Martin (NRS) <Martin.OHare@glasgow.gov.uk>
Subject: Consultation for removal of steel tower overhead line and replacement wood pole overhead line.

Dear Hugh, Paul, Martin

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OFFICIAL

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