Kennoxhead Windfarm to Coalburn Substation 132 kV Overhead Line

Gatecheck Report

July 2022

SP ENERGY NETWORKS

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1 Introduction

1. This Gatecheck Report has been prepared by RSK on behalf of ScottishPower Energy Networks (SPEN) in relation to proposals to construct a 132 kV continuous overhead line (OHL) and two sections of underground cable at each end of the OHL between Kennoxhead Windfarm (Grid ref: 277165E 624386N) and Coalburn Substation ~14 km north-north-east (Grid ref: 282510E 637337N). Kennoxhead Windfarm is located on land south of the A70, near the village of Glespin on the Douglas Estate while Coalburn substation is located on land west of the M74 near Coalburn. The Kennoxhead Wind Farm Grid Connection project ('the proposed development') is located within the South Lanarkshire Council Local Authority Area. The application for consent for the Proposed Development will be supported by an Environmental Impact Assessment (EIA) Report.

1.1 Background

2. SPEN owns and operates the electricity transmission and distribution networks in central and southern Scotland through its wholly-owned subsidiaries ScottishPower Transmission Plc (SPT) and ScottishPower Distribution Plc.

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

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

5. As a result, SPEN is proposing to construct a new 132 kV OHL between Kennoxhead Windfarm and Coalburn Substation.

6. SPEN takes the view that the project falls within the scope of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

1.2 Purpose of Report

7. This Gatecheck Report has been prepared in line with Section 37 (Electricity Act 1989) application gate-checking procedures, as established by the Scottish Government's Energy Consents Unit (ECU), namely to outline consultations with statutory and non-statutory consultees, engagement with the local community and how matters raised during the scoping process will be dealt with in the EIA Report.

8. This Gatecheck Report will describe the design evolution of the proposed development since the scoping stage including, where relevant, changes that have been made in response to consultations and community engagement in advance of the application for consent being made.

2 Proposed Development

2.1 Description

9. The proposed development falls within the administrative boundary of South Lanarkshire Council.

10. An overview of the proposed development is shown in **Figure 1**.

11. The proposed development originates as an underground cable at the Kennoxhead Windfarm substation, oriented in a north easterly direction following a valley moorland landscape located between Kennox Water and an area of commercial forestry. The buried cable becomes an OHL 1.8 km north east of the Kennoxhead Windfarm substation. The proposed route then crosses an area of degraded land (from opencast workings). The proposed route passes Carmacoup and crosses the A70, near a small number of residential properties, and continues broadly north-east and enters the Douglas Water valley with the village of Glespin and the A70 to the south. The proposed route continues through the Douglas Valley to the north-west of the village of Douglas. Here the proposed route passes Douglas West Wind Farm. Approximately 1 km after Douglas West Wind Farm the proposed route changes direction, heading north-west. The proposed route continues north-west across a landscape comprising moorland and large former opencast mining areas (including the former Dalquhandy opencast coal site). The proposed route then loops around the south and south-west of the village of Coalburn. To the west of Coalburn, the proposed route briefly runs through a transitional landscape between upland and lowland. The final northern section of the proposed route runs through a simple moorland landscape, with signs of former and current opencast mine working visible within the landscape. The proposed route runs to the east of Hollandbush Golf Club and then in close proximity to individual properties such as Glaikhead (a cluster of four properties on Coalburn Road) and Johnshill Farm. The landform in this location is relatively level or only slightly undulating lowland landscape. The OHL becomes a buried cable again 130 m west of the Coalburn substationIn total the proposed route is 13.3 km in length, comprising 10 km of OHL and 3.3 km of buried cable.

12. The main settlements within the surrounding area include the villages of Coalburn, Douglas, Glespin, Auchlochan Garden Village retirement complex, and the town of Lesmahagow, which is approximately 900 m north of Coalburn substation. The proposed development skirts around Coalburn and Glespin. There are no settlements through which the proposed route passes. In addition to the settlements listed above, there are a small number of scattered small groupings and individual properties/farms along the proposed route and within its vicinity. Overall the study area for the proposed route is sparsely populated. The main communication routes within the area, and as mentioned above, include the following:

- A70, which is to the north east of the Kennoxhead connection point, connecting Edinburgh and Ayr;
- B707 which runs broadly north to south to the east of the proposed route, connecting Larkhall with Uddington;
- M74, which runs broadly parallel to the B7078, connecting Glasgow with Gretna; and
- there are other minor local roads connecting the settlements, such as Coalburn, with the wider highways network and larger towns outside the study area.

13. There are no designated landscapes of international or national importance within the surrounding area. The Douglas Valley Special Landscape Area and the Douglas Conservation Area, which are of local importance, are within the vicinity of the proposed development. Key nature conservation designations within the surrounding area include Coalburn Moss Special Area of Conservation, Muirkirk and North Lowther Uplands Special Protection Area, Coalburn Moss Site of Special Scientific Interest (SSSI), Muirkirk Uplands SSSI, North Lowther Uplands SSSI, Miller's Wood SSSI, North Lowther Hills Important Bird Area (IBA), and Airds Moss and Muirkirk Uplands IBA. There are no non-statutory nature conservation designated sites along the proposed route. There are also two areas of Ancient Semi-Natural Woodland along the proposed route, Windrow Wood and Millers Wood. There are a number of windfarm developments in the surrounding area.

2.2 Consideration of Alternatives

14. Schedule 4 Part 2 of the EIA Regulations states that an EIA Report should include, "A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects". In the context of the requirements of the EIA Regulations and guidance, SPEN considered the following reasonable alternatives to the final design of the proposed development, and these are discussed in further detail below.

2.2.1 Alternative Routes

Alternative routes within the overarching study area were identified and appraised in the Project Routeing Strategy Document (2019) against a number of environmental and technical considerations. The route that was identified as the 'preferred route', on the whole best satisfied the routeing objective and routeing strategy derived at the start of the routeing exercise, and was selected as the option to progress to consultation and subsequently to the EIA scoping stage.

2.2.2 Undergrounding

15. SPEN is obliged to comply with the requirements of the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. SPEN's approach seeks to find an OHL solution for all connections and only where there are exceptional constraints would underground cables be considered as a design alternative. Such constraints can be found in urban areas and in rural areas of the highest scenic and amenity value. Where an OHL solution is not achievable for technical reasons, SPEN look to an underground cable solution as an alternative. However, sections of underground cable identified for inclusion within a scheme, must balance the economic, technical and environmental considerations.

16. The main environmental advantage of underground cable when compared to OHL is often the reduction in effects on visual amenity and landscape character.

17. The main environmental disadvantages of underground cable when compared to OHL often relate to greater effects on habitats and natural heritage interests; unknown archaeology; drainage and land use for construction/development. The disadvantages often arise from the invasive nature of excavation of trenches to lay the cable, the extent of the area disturbed, the equipment required and the volume of materials involved.

18. In consideration of the above factors, including consideration of the EIA and the potential environmental effects of installing a new wood pole, SPEN remains of the opinion that the proposed OHL solution and alignment meet with their project routeing objective.

19. This approach and its conclusion also reflect SPEN's overarching approach to routeing of major electrical infrastructure.

20. The sections of underground cables forming part of the proposed development were included because of technical constraints, including entry to substations and proximity of turbines from the Kennoxhead Windfarm.

2.2.3 Wood Pole Design

21. The key design objective for selection of the wood poles has been to meet technical requirements, including capacity, safety, network security requirements, and OHL design parameters, whilst taking account of economic and environmental considerations.

22. As the OHL route is above 200 m AOD, it requires construction using H poles (rather than single poles), with a span length of around 100 m and pole heights ranging from 10 m – 22 m with a typical height of 13 m. Using smaller, timber structure instead of steel towers is advantageous because wooden poles have less visual impact, pole locations can be relatively flexible and the construction requirements of timber structures would also be potentially less disruptive to the landscape and habitats found along the route.

2.3 Iteration of Route Alignment

23. SPEN undertook a routeing process, which involved development and appraisal of route options including consultation with key stakeholders and local communities (detailed further in **Section 3**), to select a preferred route. Following the identification of a 'preferred route', work was progressed to identify the most appropriate alignment for the proposed development (i.e. the proposed route). This design process was led by the SPEN OHL design team, informed by the emerging findings of the environmental surveys and input from technical specialists. The preferred route has evolved as the project has progressed and the land take required has changed minorly (shown as 'Preferred Route Option Overlap' on Figure 3). This area has also been the subject of environmental surveys, constraints-led design and ongoing environmental impact assessment.

24. Where possible, SPEN wayleaves team also contacted landowners to discuss the initial design and gather their feedback. Where pole positions were considered to have a potentially adverse effect on the environment, or an adverse effect on land holdings, a new position was suggested by the SPEN wayleaves team and passed to the environmental specialists for comment. This feedback was then provided to the SPEN OHL design team for further consideration and accommodation where possible.

25. **Figure 2** visually illustrates how the design of the OHL has evolved through the design stages of the EIA process.

2.3.1 Initial Design Concept

26. An initial engineering concept design comprising angle poles only was designed by SPEN's OHL design team to reflect technical parameters which aimed to:

- minimise the number of poles required;
- maximise the span lengths between poles;
- avoidance of wake effects from wind turbines;
- minimise the number of angle poles; and
- minimise the number of crossings of the A70 and local road network, watercourses, core paths and existing OHLs.

2.3.2 Layout 1

27. The initial engineering design of the proposed development was subjected to a review by the environmental specialist teams at a design workshop in November 2020, informed by environmental information gathered during the desk and field surveys as well as feedback from consultees. This further environmental information and its application to the alignment stage included:

- **Landscape and visual**: informed by consultation responses and landowner feedback, further field work was undertaken to establish the existing baseline conditions. Baseline data was collected from publicly accessible and private land (where access was granted) to identify potential landscape receptors, and key views and visual receptors (people). The alignment of the OHL was reviewed in relation to landscape and visual sensitivities, and potential landscape and visual effects, to determine the most appropriate alignment, as well as the location and height of individual poles (subject to technical limitations of the OHL design e.g. topography). The landscape and visual review considered key views from residential properties and how the alignment of the OHL is integrated alongside existing landscape features (e.g. forestry and other existing OHLs) and in relation to underlying landform and topography.
- **Forestry**: desk based and field surveys were undertaken to assess existing woodland conditions and review proposals for long term management of woodland blocks. Consultation with Scottish Forestry (then Forestry Commission Scotland) regarding the development of route options and then the preferred route was undertaken in June 2019 and January 2020 respectively. The information gathered from surveys and consultation was used to inform the alignment of the OHL, to seek to minimise felling of woodland and utilise existing forest edges where possible.
- **Geology, Hydrology, Hydrogeology, Water Resources and Peat**: a walkover hydrological survey was carried out to obtain an overview of the study area conditions at the time of the visit, including identifying the key constraints to design: peatland areas; watercourses and waterbodies; designated sites with a hydrological or peatland designation; private water supplies and public water supply infrastructure; and mining and mineral extraction. The findings resulted in a number of design modifications to the alignment of the OHL including, moving the OHL west to avoid damage to the Coalburn Moss SAC/SSSI, watercourse buffers being agreed with SEPA, and all poles being located outwith this buffer wherever possible, minimising watercourse crossings, avoiding mine shafts and adits, and avoidance of sensitive wetland habitats.
- **Ecology**: the initial biodiversity field surveys comprised an extended Phase 1 Habitat Survey including an assessment of suitable habitat for any protected species e.g. otter, water vole, pine martin, red squirrel, bats (roosting potential within adjacent woodland and/or buildings) and badger, as well as a search for field signs of such species, a national vegetation classification survey, and a groundwater dependent terrestrial ecosystem survey. The findings of the extended Phase 1 habitat survey and protected species surveys informed the alignment of the OHL where appropriate, such as relocation of poles to avoid sensitive habitats and impacts on protected species.
- **Ornithology**: Desk studies, consultations to date, and a programme of targeted ornithological field surveys between February 2020 and July 2021, including vantage point surveys, walkover surveys, breeding bird surveys and a raptor nest search. These included surveys for populations where individuals breed, roost or forage at distances of up to 5km from the New 132kV OHL.
- **Cultural Heritage:** a desk-based assessment and walkover field survey was conducted to identify all known cultural heritage assets within 200 m of the 'preferred route'. Amendments were made to the route of the proposed development to avid impacts on non-designated assets.

28. In addition to the environmental design inputs outlined above, SPEN engineers undertook a site walkover survey and made changes to avoid unsuitable ground conditions, such as run off catchment areas and marshland.

29. At this stage, SPEN's design team issued layout 1 which included all wood pole locations and indicative working areas and access tracks. This design was subject to review by the environmental specialist teams based on data collected from their EIA surveys, and consultation with landowners.

2.3.3 Layout 2

30. Following landowner consultation Layout 1 was realigned so the OHL crosses rather than circumnavigates Douglas West Wind Farm to avoid a proposed mixed use development. This resulted in Layout 2 which also comprised all working areas, construction compounds and access tracks along the proposed route following the detailed SPEN construction team input and review.

2.3.4 Final Layout

Layout 2 was subject to review by the environmental specialist teams based on data collected from their EIA surveys, and consultation with landowners.

Modifications to Layout 2 were recommended by environmental specialists and landowners primarily to:

- relocation of the main site compound to avoid requirement for felling and to reduce construction traffic using proposed junction onto Coalburn Road;
- micrositing of a laydown area to avoid requirement for felling;
- relocation and redesign of proposed accesses and work areas following discussions with South Lanarkshire Council (SLC) roads department (**Section 3.4.1**);
- realign the OHL to avoid the requirement for felling for wayleaves - this would mean siting two poles a minimum of 10 m from manmade ponds on the area of degraded land (from opencast workings) south east of Carmacoup forest. It was proposed that extra mitigation measures would be undertaken in relation to sediment management and surface water management to protect the ponds from sediment release. In addition, the connectivity between these manmade features and the wider water environment will be assessed in the EIA Report. SEPA agreed that this approach was acceptable;
- realign the route to circumnavigate the route around Douglas West Wind Farm, which is under construction, following confirmation of as built coordinates to avoid turbine topple distance and minimise wake effects and other cumulative development in vicinity;
- realign the OHL to avoid crossing land allocated for housing development;
- Finetuning of cable location in discussion with landowner at Kennoxhead; and
- Finetuning of cable location at Coalburn substation to reflect electrical requirements.

The Final Layout, including the proposed route, accesses, compounds, lay down areas and working areas is shown on **Figure 3**.

3 Pre-Application Consultation

31. Stakeholder engagement, including public involvement, is an important component of the Scottish planning and consenting system. Until the ‘Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989’ was published by the ECU in February 2022 (updated in July 2022), there was no formal pre-application requirements for consultation in respect of applications for section 37 consent/deemed planning permission. Previously though, legislation and government guidance aimed to ensure that the public, local communities, statutory and other consultees and interested parties had an opportunity to have their views considered throughout the planning process.

32. SPEN has always recognised the importance of consulting effectively on proposals and of being transparent about the decisions reached. SPEN engaged, in accordance with best practice at the time, with key stakeholders including local communities and others who have had an interest in the proposed development and the feedback received has been considered during the detailed design of the final route alignment.

33. SPEN undertook a routeing exercise, which included a Routing Strategy Document setting out the routing methodology, including the routeing objective and the routeing strategy, and the outcome of the appraisal of route options culminating in the 'preferred route', in 2019 in relation to the proposed development. The Routeing Consultation Document was consulted upon and comments sought from statutory and non-statutory consultees and the public. Following this, public consultation events were held in February 2020.

34. Feedback received from statutory and non-statutory consultees, the public and landowners during the routeing consultation exercise was taken account of by SPEN, and modifications to the 'preferred route' were made culminating in the 'proposed' route. SPEN was of the opinion that the proposed route taken forward to the detailed alignment stage best met the Routeing Objective for the proposed development and SPEN's wider statutory duties. The 'proposed route' was progressed to the EIA Scoping stage and detailed design alignment.

3.1 Routeing Consultation Document

35. For the proposed development, SPEN began by establishing a number of possible ‘route options’. This process involved designing routes in accordance with the Holford Rules[1], that best fit the landscape and minimise effects on visual amenity, whilst avoiding wherever possible areas of high environmental value. To allow identification of a preferred route option, an appraisal of the route options was undertaken against technical, economic and environmental considerations to identify the relative potential of each route option to accommodate an OHL.

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

37. Key statutory and non-statutory consultees were contacted to inform them about the proposals and give them the opportunity to comment on the preferred route and the routeing consultation document. **Table 1** provides a list of these consultees.

Table 1: Consultee list

Statutory Consultees	Non-Statutory Consultees			
Scottish Government ECU	Scottish Rights of Way and Access Society (ScotWays)	The Crown Estate	Health and Safety Executive	National Trust for Scotland
South Lanarkshire Council (SLC)	Civil Aviation Authority	National Air Traffic Services Safeguarding	BT	Sustrans Scotland
NatureScot	Visit Scotland	BAA (Glasgow Airport)	Glasgow Prestwick Airport	Fisheries Management Scotland
Historic Environment Scotland	Clyde River Foundation	Scottish Wildlife Trust	The Coal Authority	British Horse Society
Scottish Environmental Protection Agency (SEPA)	Defence Infrastructure Organisation (MoD)	Association for the Protection of Rural Scotland (APRS)	RSPB	West of Scotland Archaeology Service (WoSAS)
	Scottish Forestry	Marine Scotland	Transport Scotland	Scottish Water
	British Trust for Ornithology Scotland (BTO)	JNCC (for Geological Conservation Review)	John Muir Trust	Mountaineering Scotland

[1] It is generally accepted across the electricity industry that the guidelines developed by the late Lord Holford in 1959 for routeing overhead lines, ‘The Holford Rules’, should continue to be employed as the basis for routeing high voltage overhead lines. A subsequent review of the Holford Rules (and NGC clarification notes) was undertaken by Scottish Hydro Electric Transmission Limited (SHETL) in 2003 to reflect Scottish circumstances.

Statutory Consultees	Non-Statutory Consultees			
	National Farmers Union	The Woodland Trust	Ramblers Association (Scotland)	Scottish Badgers
	Scotia Gas Networks			

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

3.1.1 Consultation Responses

Of the 38 consultees contacted, responses were obtained from 11. Additionally, one response was received from a member of the public. Responses received from interested parties are summarised in Table 2 along with a reply on each point. Full responses and replies are contained within **Appendix 1**.

Table 2: Summary of consultee comments

Consultee	Comments	Response/Action taken
Crown Estate	Requested shapefiles for preferred route alignment. No further comment received.	Shapefiles provided.
Coalburn Community Council	Coalburn Community Council stated that they have no wish to stand in the way of progress, but they do not want to see the area being blighted with poles and overhead cables being classed as progress. They would like the OHL undergrounded.	The EIA Report will assess potential impacts on landscape and visual impacts in combination with cumulative development. The applicant has attended Coalburn Community Council meetings to receive further feedback regarding the concerns of the local community.
Douglas Community Council	Douglas Community Council requested a figure showing the indicative route of the OHL and the proposed configuration so that it could be shown to members of the community council. No further comment received.	Figure provided.
Historic Environment Scotland	HES stated that as the three Route options presented are located in corridors away from sites for their historic environment interests they would therefore have no preference on the options.	Noted
JNCC	JNCC stated that as this development proposal is not located within the offshore area, does not have any potential offshore nature conservation issues and is not concerned with nature conservation at a UK-level, they do not have any comments to make on the consultation.	
MOD Safeguarding	MOD confirmed that they had no safeguarding objections to the proposal. However whilst they have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. Defence Infrastructure Organisation (DIO) Safeguarding therefore requested that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing: a. Precise location of development. b. Date of commencement of construction. c. Date of completion of construction. d. The height above ground level of the tallest structure. e. The maximum extension height of any construction equipment. f. Details of aviation warning lighting fitted to the structure(s)	Noted.
RSPB	RSPB stated that until they have access to the full ornithological survey results and relevant environmental impact assessment (EIA) documents, they reserve judgement on the proposed route of the development. However, there were a few sections that they were able to provide comment on. They welcomed the proposal to route the powerline around Coalburn Moss SSSI and SAC. Ideally, they would like to see the line pass as far away as possible from the site in order to minimise the impacts on the birds that will be using the area. As the habitat management area (HMA) designated as part of the Kennoxhead Wind Farm development would potentially be impacted by this proposal, preference is for route option that would be furthest from the known black grouse leks and will have the least impact on the HMA from their current understanding, but as mentioned before they reserve full judgement until reviewing the full EIA.	Noted.
Scottish Forestry	Scottish Forestry stated that the main issue of concern to in relation to Development Planning is that of development deforestation and the potential effects it could have on the ecology and landscape of local and wider environs. Scottish Planning Policy paragraph 218, issued by the Scottish Government, refers to the Control of Woodland Removal Policy which seeks to protect the existing forest resource in Scotland, and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. Scottish Forestry also stated that they have very much welcomed the ongoing discussions with SPEN and RSK on the Kennoxhead to Coalburn routing study and potential route options, since June 2019. Scottish Forestry were pleased to note that the preferred route is the same as that discussed at our most recent meeting and avoids as much woodland loss as possible. With this in mind Scottish Forestry had no further comments to add.	Noted.

Consultee	Comments	Response/Action taken
SEPA	At this stage given the design of the poles proposed SEPA didn't raise any route specific comments. Our standard comments would apply at this stage and the construction of the poles and OHL will probably be of most interest to us for the project going forward.	Noted.
NatureScot (formerly SNH)	Highlighted some matters in the Ecology Baseline Review (March 2019) and Ornithology Baseline Review (April 2019) that RSK sent them in late January 2019 that they wanted to pick up on in terms of the subsequent assessment of the proposed route: Firstly, the Ecology Baseline Review (March 2019) says that "If there will be no direct effect on the moss [Coalburn Moss SAC], SNH have previously said that an HRA [Habitat Regulations Appraisal] would not be required". SNH clarified an HRA may also be needed if there are any indirect effects on the SAC. It may well be that any such effects will be avoided through the choice of exact location for the proposed route. Secondly, given that the route i) lies partly between two sections of the Muirkirk & North Lowther Uplands SPA, ii) it lies within the core foraging ranges of the SPAs breeding bird interests, and iii) there is some evidence from the flight activity surveys for the Kennoxhead Wind Farm ES of activity by SPA qualifying species in the area of the OHL, SNH stated that they would be minded to suggest that there would be a 'likely significant effect' (in HRA terms) from the proposal on the SPA at this stage - i.e. that there is a connection between the proposal and the site's qualifying interests. SNH stated that this was something to revisit once the results of more recent survey work undertaken for the proposed development was available in order to confirm whether an HRA would be required.	Issues raised by NatureScot taken into consideration and have been discussed with ornithologist and NatureScot to ensure compliance. Further discussions have been undertaken with NatureScot regarding Covid-19 situation and to agree approach if any surveys have to be postponed. Further details on HRA requirements are provided in Appendix 1.
The Coal Authority	The Coal Authority confirmed that the preferred route partly fell within the Coal Authority's defined Development High Risk Area. Accordingly, the Scottish Ministers should consult the Coal Authority on the application for consent (in its role as statutory consultee). At this stage the Coal Authority's Planning team will become involved as it will need to assess the proposed development and the Coal Mining Risk Assessment that will also be required to be submitted with it.	Noted Further details on Coal Mining Risk Assessment requirements are provided in Appendix 1.

3.2 Community Engagement

3.2.1 Public Exhibitions

39. SPEN hosted events in Coalburn and Douglas during February 2020 to present and consult on the Preferred Route option for the new 132 kilovolt (kV) overhead line (OHL). Public consultation was undertaken to invite views on the preferred route for the proposed development and information of any other issues, suggestions or feedback, particularly views on the local area, for example areas used for recreation, local environmental features, and any plans to build along the route. A copy of the Routeing Consultation Report was made available for public viewing during normal hours at South Lanarkshire Council's offices in Hamilton, Coalburn Miners Welfare One Stop Shop and Douglas St Brides Hall.

40. Exhibitions were held in the following locations:

Wednesday, 5th February 2020

1.00 – 8.00pm

Coalburn Miners Welfare One Stop Shop

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

Thursday, 6th February 2020

1.00 – 8.00pm

Douglas St Brides Hall

Braehead, Douglas, Lanark, ML11 0QW

41. Venues were chosen to ensure that people near to the route were only a short distance from their nearest exhibition by car or public transport.

3.2.2 Online Public Information Events

42. Three online public information events were held online to update on the progress of the proposals.

43. The online public consultation events were held at the following dates and times:

20 June 2022: 3-4 pm

21 June 2022: 6.30-7.30 pm

22 June 2022: 3-4 pm

Website: www.spenkennoxhead.co.uk/publicsession.

3.2.3 Community Engagement Feedback

Public Exhibitions

44. There were 17 attendees at the event in Coalburn and 15 attendees at the event in Douglas. Attendees were invited to complete a feedback form. Members of the public were given until 15th March 2020 to submit consultation responses. Five feedback forms were received and the responses summarised in **Table 3** below.

Table 3: Summary of feedback from public events

Question	Summary of Responses
Do you have any comments regarding the rationale for the project?	Two respondents asked why the OHL could not be undergrounded. A further respondent stated that it seems a good idea to go overhead rather than underground with cabling. Two respondents commented that the information laid out in the exhibition was easy to understand.
Do you have any other comments regarding our proposed preferred route?	One respondent commented that the OHL should be undergrounded for landscape and visual reasons as the OHL would be an eyesore. Another respondent stated that the route seemed logical and that the OHL was relatively inoffensive when compared to a Wind Farm.
Additional Feedback	An email was received from a Coalburn resident who could not attend the exhibition. This resident felt that the OHL would spoil the area. Additionally, with typical weather conditions experienced in the area, there would be a danger that the lines would be brought down in high winds.

Online Public Information Events

45. There were no attendees at any of the online events.

3.3 Scoping

46. Scoping provided stakeholders with the opportunity to comment on an appropriate EIA scope.

47. A Scoping Request was submitted alongside a Scoping Report to the ECU on 24 June 2020[2], who then contacted the same consultees as before (**Table 1**) to determine their views on the proposed route of the Proposed development and to collect baseline information. Replies received from consultees in response to Scoping are detailed in **Appendix 1**.

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

49. Although SPEN has taken on board all consultee comments and factored these into assessments, a further scoping exercise was undertaken in May 2022 which involved asking consultees to highlight if they felt that there had been any significant changes to the scoping advice on environmental matters within their remit previously provided. Comments received are included in Appendix 1.

3.4 Further Consultation

50. In addition to the scoping consultation, additional consultation was undertaken with key consultees regarding specific issues. All further consultation is summarised below.

3.4.1 South Lanarkshire Council (SLC) Roads

51. SLC Roads Department were contacted in March 2021 in relation to the scope of the transport assessment. SLC were provided with a plan showing the site location and route corridor along with details of the proposed site access, temporary road works and construction traffic management measures.

52. As the layout progressed from layout 1 to the final layout further consultation was undertaken with SLC Roads Department between April 2021 and June 2022. During this period site access, visibility splays, swept paths, compound/yard locations and traffic management were discussed. A joint site visit was undertaken by SLC Roads Department, SPEN and the RSK transport team to review proposed accesses. These discussions resulted in amendments to the layout (see 2.3.4), agreement regarding the appropriate level of detail would to be provided in the EIA Report and what could be covered by planning condition.

3.4.2 SEPA

53. SEPA were contacted in September 2021 during design iteration 3. This was to discuss the potential to realign the proposed development to avoid felling of forestry towards the Kennoxhead point of connection. It was proposed to move the overhead line further east, away from the forestry plantation. This would mean siting two poles a minimum of 10 m from manmade ponds. It was proposed that extra mitigation measures would be undertaken in relation to sediment management and surface water management to protect the ponds from sediment release. In addition, the connectivity between these manmade features and the wider water environment will be assessed in the EIA Report. SEPA agreed that this approach was acceptable.

4 Application Details

4.1 Availability of the EIA Report

54. A copy of the application, with a plan showing the land to which it relates, together with a copy of the EIA Report discussing the Company's proposals in more detail and presenting an analysis of the environmental implications, will be available for download free of charge via the Kennoxhead Wind Farm Grid Connection webpage: https://www.spenergynetworks.co.uk/pages/kennoxhead_wind_farm_grid_connection.aspx and the ECU portal at: www.energyconsents.scot, under application reference ECU00002096.

55. Electronic (USB) and hard copies of the EIA Report will be provided by SPEN on request using the following project email address:

Kennoxheadgc@spenenergynetworks.co.uk

56. Currently, under the Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020, the requirement for developers to make Section 37 application documents including the EIA Report available for public inspection in hard copies at a place within the locality, has been temporarily suspended during the COVID-19 pandemic. This will be reviewed nearer to the time of the submission.

4.2 Notification

57. The Section 37 Application for consent will be advertised for one week in the Edinburgh Gazette and a national newspaper, and for two weeks in a local newspaper. The dates of publication are yet to be confirmed as are the local and national newspapers.

[2] Accessible at: https://www.energyconsents.scot/ApplicationSearch.aspx using case reference ECU00002096

Appendix 1: Consultation Matrix

Responses received during the Scoping consultation in June 2020 and May 2022 are contained in Table 4, along with comments from the applicant outlining how the comments have been addressed. Scoping responses from the most recent consultation in May 2022 has been highlighted.

Table 4: Scoping responses and replies (updated scoping responses received in May 22 are highlighted for ease of reference)

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
STATUTORY CONSULTEES					
Scottish Government Energy Consents Unit (ECU) – Scoping Opinion	**Lesley Tosun**	lesley.tosum@gov.uk	March 2021	Stated that, where there is a demonstrable requirement for peat landslide hazard risk assessment, the assessment should be undertaken as part of the EIA process.	The routing stage of the proposed development sought to avoid areas of deep peat as far as practicable to minimise potential for peat slide. Consideration of peat landslide hazard risk assessment will be covered in **Chapter 7: Hydrology and Geology**
				Consider that the mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Requested that a consolidated schedule of mitigation measures is included in the EIA Report.	All embedded mitigation measures are set out in Chapter 4: Development Description. In addition, the relevant embedded and additional mitigation measures are also described in detail in the specialist topic chapters. **Chapter 2: Approach to the EIA** will be supported by a Schedule of Mitigation which forms **Appendix 2.2** and sets out all embedded and additional mitigation measures on a topic-by-topic basis.
				This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted.
				It is acknowledged that the EIA process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note further engagement between relevant parties in relation to the refinement of the design of the proposed development may be required, and would request that they are kept informed of ongoing discussions in relation to this.	Noted.
				When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in the scoping opinion has been addressed.	Noted.
				Applicants are encouraged to engage with officials at the Scottish Government Energy Consents Unit at the pre-application stage and before proposals reach the design freeze.	Noted.
South Lanarkshire Council (SLC)	**James Wright** **Planner** **Planning and Economic Development**	P/20/1066 james.wright@southlanarkshire.gov.uk Montrose House 154 Montrose Crescent Hamilton ML3 6LB 01698 455903	4/12/20	<u>General</u> SLC agree with the topics listed in the Scoping Report. Request that a standalone chapter outlining all proposed mitigation and enhancement measures should be included. <u>Archaeology and Cultural Heritage</u> Although it is explained in the text that Figure 5.1 only shows non-designated assets within a 200m buffer of the proposed overhead line (OHL) route, this is not clear on the figure, which gives a false impression of the range and density of recorded material present. Any EIAR figures should make it clear that only non-designated assets within a 200m buffer have been shown on the figure. Important that the proposed field survey is undertaken to identify features not included in desk-based review and assess how features might be affected by ground disturbance caused by construction activities. Assessment of direct impacts during construction should include locations of wooden poles, compound areas, lay down areas and temporary access tracks. Disagree with scoping out indirect effects on setting until possible effects on the setting of non-designated assets have been considered as well as designated assets.	Noted An archaeological walkover survey identified previously known and identified previously unknown non-designated assets within 200m of the proposed route, including associated infrastructure outside of this route corridor. Indirect impacts on setting of non-designated assets was considered in assessment of potential significant effects. Results of survey and assessment detailed in **Chapter 10: Cultural Heritage.** WOSAS were consulted further. This consultation is detailed further in **Chapter 10: Cultural Heritage**.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				<u>Geology, Hydrogeology and Hydrology</u> A sustainable drainage system serving the application site is to be provided. A flood risk assessment and the sustainable drainage system should comply with the requirements set out in SLC's Developer Design Guidance (dated May 2020). Consideration should also be given to surface water management during construction.	Flood risk, drainage and water management are addressed in **Chapter 7: Hydrology and Geology,** including relevant construction mitigation measures. An appraisal of the potential construction noise impact at the nearest residential receptors was conducted by a competent acoustics expert. The results of this are detailed in **Chapter 2: Approach to the EIA**. Given the minimal operational noise from installations of the proposed development's type and the short-term transient nature of construction works the scope of this appraisal is considered proportionate.
				<u>Amenity and Health</u> Should be reference in EIAR, such as appendix or separate noise statement, to show that construction and operational noise will not impact amenity.	A section covering transportation is set out in Chapter 2: Approach to the EIA, which includes key data. Based on the short term nature of the construction and decommissioning processes, the geographic spread of the construction works on the public road network and SPEN's commitment to appropriate traffic management it is considered that this approach is proportionate. SLC Roads department were consulted further and details of this consultation are set out as relevant in **Chapter 2: Approach to the EIA**.
				<u>Transportation</u> Council would prefer stand alone chapter or transport statement rather than the TMP being a technical appendix. Details of scaffold arrangements and stand-offs to the public roads will be required along with proposals for traffic management. A submission of proposals showing specific material delivery points, lay down spaces, turning areas, site compound(s)/storage, site car parking, crane platforms is required. There should also be some information on the anticipated traffic volumes and routes associated with woodland clearance, material deliveries and site staffing. A larger scale plan showing the specific route of the OHL showing standoffs to the Council's road infrastructure such as culverts, bridges, underpasses should be submitted. Proposals for maintaining access to the Council's Core Paths during the construction phase should be submitted.	Following further consultation and a site visit, it was agreed that the applicant would provide a transport statement as a technical appendix to the EIA Report. Agreement has been reached regarding the level of detail required in the transport statement and associated plans. RSK have undertaken speed surveys to determine the length of visibility splay required at site access junctions. Changes to the layout of the proposed development have been made to mitigate potential impacts on traffic and transport, such as relocation of the main site compound and proposed accesses. Additional mitigation measures, including traffic management, were agreed and will form part of the schedule of mitigation included in the EIA Report.
South Lanarkshire Council	**As above.**	As above.	06/05/22	SLC confirmed it is content that the Council's scoping opinion response to Scottish Ministers is still appropriate in respect of the project as well as the further engagement that has also been carried out with the Council by RSK since it was issued.	Noted.
NatureScot	**David Kelly** **Area Officer**	CEA1602201 David.Kelly@nature.scot Cadzow Court 3 Wellhall Road	04/09/20	<u>General</u> NatureScot guidance 'General pre-application and scoping advice for onshore wind farms' provides information on recommended survey methods, sources of further information and guidance, and data presentation. Following cases decided in the EU Court of Justice, mitigation cannot be taken into account in the assessment of effects on Natura sites unless the mitigation is essential/intrinsic.	Consideration of protected areas and peat is provided in **Chapter 8: Ecology** and **Chapter 9: Ornithology**.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
		Hamilton ML3 9BG 01698 421668		<u>Key Issues</u> Protected areas: • Muirkirk & North Lowther Uplands Special Protection Area (SPA) – preferred route lies close to SPA, which is classified for its breeding hen harrier, peregrine, merlin, short-eared owl and golden plover and for its non-breeding (wintering) hen harrier. A Habitats Regulations Appraisal (HRA) will likely be required so application must include sufficient information to facilitate this. There is likely to be a significant effect on the SPA because it overlaps with the foraging ranges of the SPA species. EIA should consider collision risk for SPA bird species during operation, potential disturbance for SPA species during breeding season and for hen harrier during nonbreeding season. • Coalburn Moss Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) – designated for active raised bog and degraded raised bog still capable of natural regeneration. Will also be subject to a HRA if significant effects likely so application must include sufficient information to facilitate this. EIAR should include information of the proposed route and construction methods, including access requirements, so potential significant effects on SAC can be determined. EIA should consider stand alone and cumulative effects on SAC. If no significant effects predicted then there should be sufficient justification in EIAR. Coalburn Moss SSSI also notified for raised bog habitat so advice above should be followed in assessment of impacts on the SSSI. • Kennox Water SSSI - notified for its geological interest. The potential for impacts on the geological interest of the site, including indirect impacts on the site's accessibility or visibility, will require consideration as part of the EIA process. Recommend that a buffer between the site and any development is maintained. Adjacent development would only be likely to affect the interest of the site if construction debris was to be deposited within the site. <u>Carbon-Rich Soils, Deep Peat and Priority Peatland Habitat</u> Welcome proposal for targeted peat depth surveys. Part of preferred route, north of Coalburn, classes as Class 1 peat so will be a key area for surveying. Surveys should comply with Scottish Government guidance. SEPA should be consulted regarding excavated peat reuse and disposal. A draft peat management plan should be included in EIAR. <u>Landscape and Visual Impacts</u> Would like to agree final viewpoint list with applicant. Cumulative effects should be considered. Cumulative assessment should consider current baseline (existing and under construction developments) and alternative baselines, such as consented but not constructed schemes. Cumulative assessment should accord with NatureScot guidance. Expect a final Zone of Theoretical Visibility (ZTV) to be included in the EIAR. <u>Ecology and Ornithology</u> Advise the applicant seeks information on breeding raptors from the South Strathclyde Raptor Study Group to help with EIAR and issues that may need addressed during construction. Recommend Phase 1 habitat survey focuses on habitats listed in Annex 1 of the EC Habitats directive and UKBAP Priority Habitats, and be accompanied by supporting quadrat information. Protected species surveys should be undertaken in accordance with NatureScot guidance. Regarding ornithological surveys: • all relevant wind farm data, even data older than 5 years if the recent data supports its conclusions, is appropriate; • surveys missed due to Covid-19 are required but only one year necessary. Principle surveys required are the winter walkover surveys, which should be completed fully in 20/21 season and the	Construction within peatland has been kept to a practical minimum. Methods for managing peat on site are outlined in **Chapter 7: Hydrology and Geology**. A peat management plan would be created prior to construction in any areas of peatland. **The final viewpoint list was agreed in consultation with NatureScot.** All existing cumulative sites have been considered in the existing baseline. An alternative baseline that includes under construction or consented schemes has been assessed. Details of the cumulative assessment are provided in **Chapter 6 Landscape and Visual Amenity.** A ZTV is included in **Volume 3: Figures and Visualisations.** Consideration of ecology and ornithology is provided in **Chapter 8** and **Chapter 9.** Any further consultation is detailed further in these chapters. Full details of ecology and ornithology survey efforts are included in **Appendices 8.1-8.3.**

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				Moorland Breeding Bird/Scarce Breeding Bird surveys in 2021. Guidance from NatureScot available; and • Would like black grouse surveys to be taken and factored into design. Evidence from recent wind farm surveys indicate that black grouse population might be of national importance. Black grouse susceptible to collision with OHL so mitigation by good route planning advised.	
NatureScot	**David Kelly**	As above.	30/05/22	NatureScot agreed that there has been no significant changes to our advice and therefore it remains appropriate.	Noted.
Scottish Environment Protection Agency (SEPA)	**Peter Minting** **Planning Officer**	PCS/172588 planning.sw@sepa.org.uk	Letter response dated 7th September 2020.	<u>General</u> Following key issues must be addressed in the EIA to avoid delay and potential objection: • Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications; • Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTEs) and buffers; • Map and assessment of impacts upon groundwater abstractions and buffers; • Peat depth survey and table detailing re-use proposals; • Map and table detailing forest removal; • Map and site layout of borrow pits; • Pollution Prevention Plan and Construction Method Statement; • Borrow Pit Site Management Plan; • Map of proposed surface water drainage layout; and • Map of any proposed water abstractions, with details of the proposed operating regime. <u>Site-Specific Comments`</u> A peat management plan should be submitted with EIAR and include assessment of opportunities for enhancement. Would welcome an assessment of habitat enhancement along proposed route. Habitat maps must be overlain with all proposed infrastructure. Invasive non-native species survey not required but final plans should include a commitment that any INNS encountered will be appropriately managed. <u>Regulatory Advice</u> Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.	**Chapter 7: Hydrology and Geology** assesses the effects of the proposed development on the water environment and is accompanied by supporting figures. CAR licences will be applied for by the appointed contractor during the construction stage. A schedule of mitigation is included in **Appendix 2.2**. Further design details relating to peat are included in **Chapter 3: The Routeing Process and design Strategy** and **Chapter 7: Hydrology and Geology**. Methods for managing peat on site are outlined in **Chapter 7: Hydrology and Geology**. A peat management plan would be created prior to construction in any areas of peatland. Noted. The applicant is considering potential for biodiversity net gain as part of the application for the proposed development. Noted. Noted.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which: • is more than 4 hectares, • is in excess of 5km, or • includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25˚ Below these thresholds the applicant will need to comply with CAR General Binding Rule 10 which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition. SEPA have guidance for construction sites. Applicant can engage SEPA in pre-CAR application discussions. <u>Site Layout</u> All maps must be based on an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required. <u>Engineering Activities</u> The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing: • All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; • A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works; • Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided. Refer to Appendix 2 of SEPA's Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted. SEPA's 'technical flood risk guidance for stakeholders' outlines the information required as part of a Flood Risk Assessment. <u>Disturbance and Re-Use of Excavated Peat and Other Carbon Rich Soils</u> The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.	Noted. The routeing stage of the project sought to avoid or cross all flood zones at their narrowest point where avoidance was not possible. The detailed design stage has sought to avoid watercourse crossings by maintaining a 20m buffer around all ground infrastructure. Where this has not been possible due to other environmental constraints, details have been provided in **Chapter 7.** Further design details relating to the water environment are included in **Chapter 3.**

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				The submission must include: • A detailed map of peat depths (this must be to full depth and follow the survey requirement of Scottish Government's guidance) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors; and • A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included. Proposals must be in accordance with Scottish Renewables 'Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste' and SEPA's 'Developments on Peat and Off-Site uses of Waste Peat'. <u>Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)</u> The layout and design of the development must avoid impact on GWDTE. The following information must be included in the submission: • A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; • If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected <u>Existing Groundwater Abstractions</u> The submission must include: • a map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; and • If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. <u>Forest Removal and Forest Waste</u> Key holing must be used wherever possible. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible. Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include: • a map demarcating the areas to be subject to different felling techniques; • photography of general timber condition in each of these areas; • a table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site and	Targeted NVC surveys have been undertaken across the route to inform an assessment of effects on GWDTEs in **Chapter 7**, and findings are presented in **Appendix 8.1.** Consideration of groundwater abstractions will be provided in **Chapter 7.**

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				• a plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. <u>Borrow Pits</u> Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement. A Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit: • a map showing the location, size, depths and dimensions. • a map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure overlain with all lochs and watercourses to a distance of 250 metres. It should be demonstrated that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. • justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock. • a ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table. • a site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works. • a site map showing proposed water abstractions with details of the volumes and timings of abstractions. • a site map showing the location of pollution prevention measures. The drawing notes should include a commitment to check these daily. • a site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (following guidance outlined above). • sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. • details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding. <u>Pollution Prevention and Environmental Management</u> A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.	**Chapter 10** provides an assessment of effects of the Kennoxhead OHL project on forestry resources along the proposed route. Forestry proposals are shown in a Technical Appendix. Noted. A schedule of mitigation is included in **Appendix 2.2**.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
				The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing.	
Scottish Environment Protection Agency (SEPA)	**Jess Taylor**	planningsoutheast@sepa.org.uk	23/05/22	SEPA reviewed the previous scoping response and the subsequent correspondence RSK had had with SEPA and SEPA agreed that their previous response remains appropriate.	Noted.
Historic Environment Scotland (HES)	**Chloe Porter**	300043076 HMConsultations@hes.scot chloe.porter@hes.scot. Longmore House Salisbury Place Edinburgh EH9 1SH 0131 668 8653/ 0131-668-8716	20/08/20	HES advised that WOSAS would be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by HES interests, such as unscheduled archaeology, and category B- and C-listed buildings. Confirm that there are no heritage assets within their statutory remit within the development site boundary or within its vicinity. Content for heritage assets within HES statutory remit to be scoped out of the assessment.	Noted. WOSAS were consulted further. This consultation is detailed further in **Chapter 10: Cultural Heritage**.
Historic Environment Scotland (HES)	**Laura Denholm – Business Support Officer**	laura.denholm@hes.scot	16/05/22	HES confirmed it was consulted on similar proposals back in August 2020. Its response remains the same which is that there are no heritage assets within our statutory remit within the development site boundary or within its vicinity. On this basis HES would be content for heritage assets within our statutory remit to be scoped out of the assessment.	Noted
Non-statutory Consultees					
British Horse Society (BHS)	**Helene Mauchlen**	helene.mauchlen@bhs.org.uk Woodburn Farm Crieff Perthshire 01764 656334/ 07808 141077	17/09/20	BHS would like to see the multi-use nature of core paths and rights of way (as in utilised by walkers, cyclists, horse riders and all abilities access takers, in keeping with the Land Reform (Scotland) 2003 Act) taken into consideration.	All new access track formations will be temporary and for facilitating construction of the New 132kV OHL only -see **Chapter 4: Development Description**. Whilst temporary diversions of recreational routes may be required during construction, works at any one location will be short in duration therefore the effect of a diversion would be limited. All existing recreational paths will remain open during operation of the OHL.
BT	**Lisa Smith** **Engineering Services Radio Planning**	WID11308 lisa.4.smith@bt.com 07483912560/ 03316640197	19/08/20	The proposed OHL should not cause interference to BT's current and presently planned radio network.	Noted.
BT		radionetworkprotection@bt.com	17/05/22	There's no change BT's scoping opinion, it has no objection to the proposed OHL	Noted.
The Coal Authority	**Deb Roberts** **Planning and Development Manager**	planningconsultation@coal.gov.uk 200 Lichfield Lane Berry Hill	26/08/20	The identified proposed route falls within the Development High Risk Area (DHRA). Accordingly, there are coal mining features and hazards that need to be considered in relation to this project. A Coal Mining Risk Assessment, or equivalent to inform the EIAR Chapter on Ground Conditions should be submitted in support of the proposed route. This will enable the applicant's technical consultants to identify and	**Chapter 7: Hydrology and Geology** has assessed potential coal mining risk during construction and operation.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
		Mansfield Nottinghamshire NG18 4RG 01623 637 119 (Planning Enquiries)		mitigate any risk to the scheme as a result of former coal mining activity and for the applicant to demonstrate to the decision maker that the site is safe, stable and suitable for the development proposed.	
Crown Estate Scotland	**Catherine Erasmus** **Assistant Portfolio Co-Ordinator**	20200828 Catherine.Erasmus@crownestatescotland.com 6 Bells Brae Edinburgh EH4 3BJ 0131 260 6070/ 07485 302700	28/08/20	The assets of Crown Estate Scotland are not affected by this proposal.	Noted.
Defence Infrastructure Organisation (MoD)	**Michael Billings** **Assistant Safeguarding Manager**	10047484 DIO-safeguarding-statutory@mod.gov.uk Kingston Road Sutton Coldfield West Midlands B75 7RL 07970171283	26/08/20	The Ministry of Defence has raised no safeguarding objections on the basis that the proposed Kennoxhead OHL Project is outside of the MoD safeguarding areas.	Noted.
Defence Infrastructure Organisation (MoD)	**Chris Waldron** **Assistant Safeguarding Manager**	christopher.waldron861@mod.gov.uk	01/06/22	MoD understood that this enquiry relates to a directive that in the event of no application within 12 months of a scoping opinion, further engagement with relevant consultees is required to ascertain if additional scoping opinion is required. MoD had a cursory search of the Energy Consents planning website, and additionally note no further updates since the DIO consultation response dated 26/08/20, which indicated our scoping opinion, which remains extant	Noted.
Glasgow Airport	**Kirsteen MacDonald** **Safeguarding Manager**	GLA3869 Kirsteen.MacDonald@glasgowairport.com Glasgow Airport Limited Erskine Court St Andrews Drive Paisley	28/08/20	The site is located outwith the Obstacle Limitation Surfaces for Glasgow Airport. It is within the Instrument Flight Procedure safeguarding area and may impact upon procedures. Glasgow Airport's position will only be confirmed once the OHL details are finalised and they have been consulted on the full application for consent.	Noted

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
		PA23 2TJ 07808 115 881			
Glasgow Prestwick Airport	**Steve Thomson**	sthomson@glasgowprestwick.com	06/09/20	This application will have no aviation safeguarding impact on Glasgow Prestwick Airport. Consequently it is unlikely that Glasgow Prestwick Airport Ltd will object.	Noted.
NATS Safeguarding		SG29307 NATSSafeguarding@nats.co.uk 4000 Parkway Whiteley, Fareham Hants PO15 7FL	17/08/20	NATS examined the proposed OHL from a technical safeguarding aspect and confirmed that it does not conflict with their safeguarding criteria. Accordingly, NATS raised no safeguarding objection to the proposal.	Noted.
RSPB	**Ed Tooth** **Conservation Officer – Scottish Lowlands and Southern Uplands**	ed.tooth@rspb.org.uk Dumfries & Galloway Office The Old School Crossmichael Castle Douglas Kirkcudbrightshire DG7 3AP 01556 670 464	14/09/20	RSPB confirmed that they had no comments to make.	Noted.
Scottish Forestry	**Sasha Laing** **Regulations & Development Manager**	centralscotland.cons@forestry.gov.scot Central Scotland Conservancy Bothwell House Hamilton Business Park Caird Park Hamilton ML3 0QA 0300 067 6006	20/08/20	Having reviewed the proposed route and the scoping report, Scottish Forestry confirmed that they are pleased to note that the route remains as previously discussed in June 2019. However Scottish Forestry also noted that the route has not been finalised and could still be subject to change. It also noted within paragraph 9.4.1 Compensatory Planting, that the compensatory planting requirements of the proposed route is currently 8.12ha and if subject to change due to routing alongside Carmacoup Forest, that this figure might reduce to 6ha. Scottish Forestry would wish to see a firm commitment within the EIA to provide a Compensatory Planting Plan, subject to approval by SF, that details the location, final area, ground preparation, species choice, protection measures and long term management of the planting, should planning approval be granted and before any development work begins.	Compensatory planting requirements are discussed in **Chapter 10: Forestry**
Scottish Forestry	**Tom Hobbs** **Senior operations Manager**	tom.hobbs@forestry.gov.scot	11/05/22	Scottish Forestry has not had sight of any changes to the route since the scoping opinion was provided by ECU. Assuming there have been no significant alterations since then SF have nothing further to add to its previous responses.	Noted.

Scoping Consultee	Contact Name (including title if available)	Reference and Contact Details	Date of Response	Comments received/ issues raised	Response
ScotWays	**Lynda L Grant** **Access Officer**	info@scotways.com The Scottish Rights of Way and Access Society 24 Annandale Street Edinburgh EH7 4AN 0131 558 1222	23/09/20	The National Catalogue of Rights of Way shows that rights of way SL103, SL117, SL118 and SL122 would be affected by 'proposed route'. As there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded. There may be general access rights over any area of land under the terms of the Land Reform (Scotland) Act 2003. Recommend that the applicant consult the Core Paths Plans, prepared by South Lanarkshire Council.	Consideration of rights of way will be given in **Chapter 2; Approach to the EIA**
Scottish Water	**Planning Application Team** **Development Operations Analyst**	DSCAS-0020135-2S6 developmentoperations@scottishwater.co.uk Development Operations The Bridge Buchanan Gate Business Park Cumbernauld Road Stepps Glasgow G33 6FB 0800 3890379	17/09/20	Scottish Water has no objection to this application; however, this does not confirm that the proposed development can currently be serviced the following is advised: • the development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact the Asset Impact Team to apply for a diversion. any conflict with assets identified may be subject to restrictions on proximity of construction. Scottish Water asset plans can be obtained Site Investigation Services (UK) Ltd; • there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas that may be affected by the proposed activity; • Scottish Water will not accept any surface water connections into their combined sewer system. There may be limited exceptional circumstances where this would be allowed for brownfield sites only; • If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude; and • The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed. All proposed developments are required to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water.	Noted
Transport Scotland	**Alan Kerr** **Development Management Trunk Road and Bus Operations**	ECU00002096 Alan.Kerr@transport.gov.scot Buchanan House 58 Port Dundas Road Glasgow G4 0HF	September 2020	It is acknowledged that any effects on the trunk road network as a result of the proposed OHL are likely to be minimal and limited to the construction period. However, anticipated trip generation has not been detailed in the supporting documentation to provide justification for the exclusion of the assessment of traffic effects from the EIA Report. The proposed preparation of a Construction Traffic Management Plan (CTMP), and the inclusion of an outline CTMP as an appendix to the main EIA Report is advisable. The scoping out of the traffic assessment from the main EIA Report is considered acceptable on the basis that a CTMP will be prepared in support of development proposals. This should quantify the anticipated trip generation over the course of the construction period, providing traffic volumes by vehicle type and month, and detail anticipated construction traffic routes, access requirements and any proposed mitigation measures. The outline and full CTMP should be submitted for approval by South Lanarkshire Council, in consultation with Transport Scotland.	A section covering transportation is set out in Chapter 2: Approach to the EIA, which includes key data. Based on the short term nature of the construction and decommissioning processes, the geographic spread of the construction works on the public road network and SPEN's commitment to appropriate traffic management it is considered that this approach is proportionate. An outline CTMP is provided.
Transport Scotland	**As above.**	As above.	09/05/22	Transport Scotland confirmed that there are no changes to the scoping advice provided the Energy Consents Unit previously.	Noted.

270000 275000 280000 285000 290000

635000 630000 625000

Coalburn

Douglas

Glespin

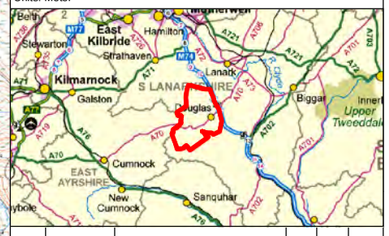
SOUTH LANARKSHIRE

Legend:

- Proposed Route Option
- Proposed 132kV Cable
- Kennoxhead Windfarm Point of Connection
- Coalburn Collector Substation

Notes:-
This is a bare ground ZTV, based on average pole heights of 13m above aground and 85m separation distances.
The exact locations of the poles are indicative only for the purposes of producing the ZTV and are not based on an actual line design.

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
01	14/03/2022	Removed Proposed Cable 132kV Route Option Overlap	TM	AP	RB
00	14/03/2022	First Draft	TM	AP	RB

Kennoxhead Wind Farm Grid Connection

RSK

TITLE:
Figure 1:
Kennoxhead Wind Farm to Coalburn Substation
Overhead Line - Overview

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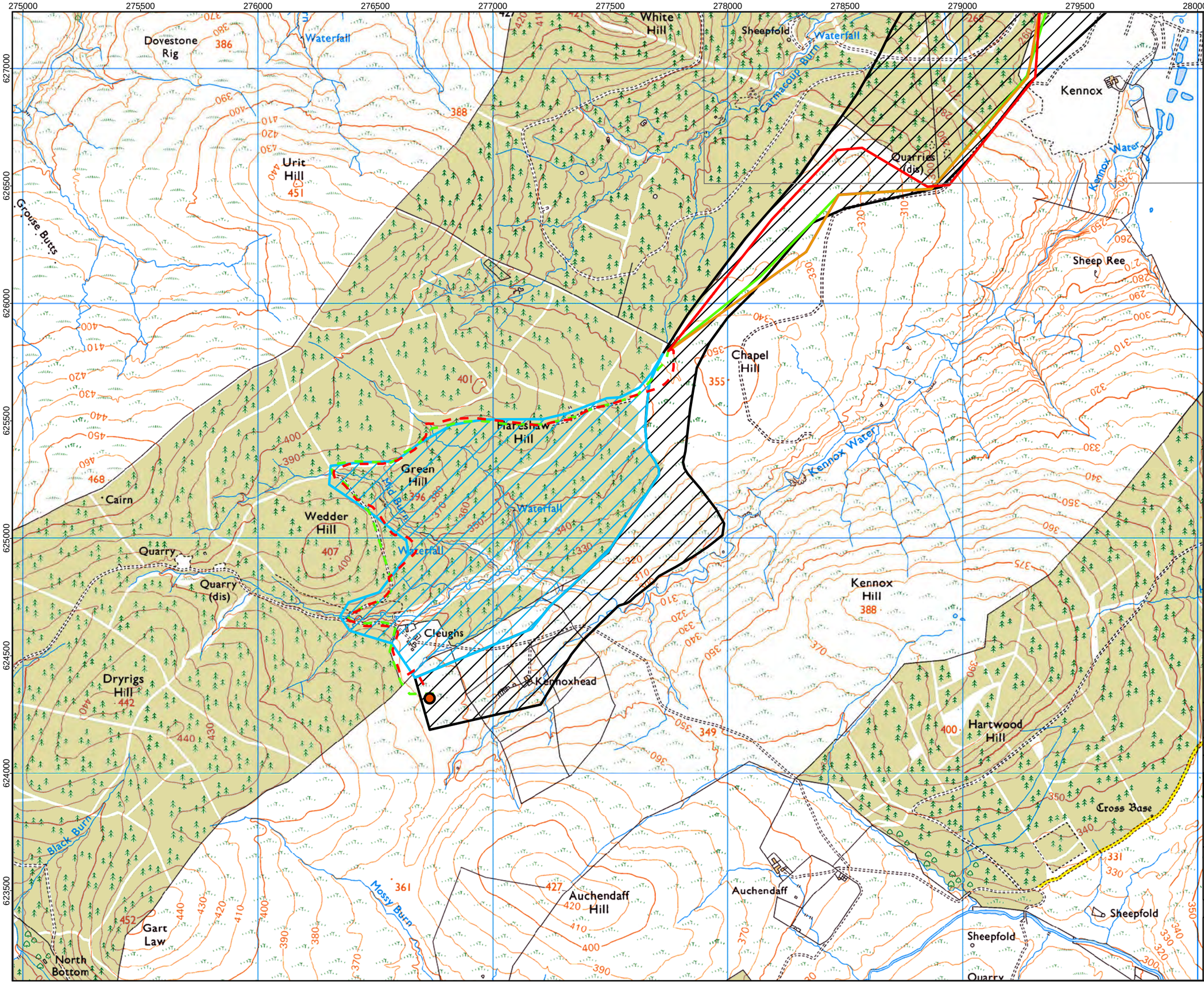
Kilometers

SCALE: 1:64,000 @ A3

N W E S

REV 01

Document Path: C:\Work\661718 Kennoxhead (TM)\01 - GIS\Figure 1- Kennoxhead Wind Farm to Coalburn Substation Overhead Line Overview 220722.mxd



Legend:

- Kennoxhead Windfarm Point of Connection
- Initial Design Layout - 132kV Cable
- Initial Design Layout - Overhead Line
- Layout 1
- Layout 2
- Final Layout - Proposed 132kV Cable
- Final Layout - Proposed Overhead Line Route
- Preferred Route
- Preferred Route Option Overlap
- Preferred Route Option

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

Rev	Date	Description	Drn	Chk	App
00	25/07/2022	First Draft	TM	AP	RB

Kennoxhead Wind Farm Connection

RSK

TITLE: Figure 2: Kennoxhead Wind Farm to Coalburn Substation Overhead Line - Design Iterations
Map 1 of 4

ID:rev1Design_Iterations220725_Figure 2: Kennoxhead Wind Farm to Coalburn Substation Overhead Line - Design Iterations

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Kilometres
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2

REV 00

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278000 278500 279000 279500 280000 280500 281000 281500 282000 282500

630500 630000 629500 629000 628500 628000 627500 627000

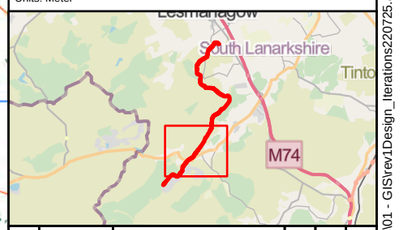
78 79 80 81 82 29 30 28 27

Common Hill
Hagshaw Hill Wind Farm
Broomerside Hill
Avermarks Hill
Old Shielings
Windrow Hill
Rob's Hill
Scrogton
Station Road
Scrogtonhead
Windrow Cottage
Windrow Wood
Ladle Knowe Motte
Arnesalloch Bridge
Weston
Weston Wood
High Broomerside
Low Broomerside
Sheepfold
Strawberry Hill
Hazelside
Jeanfield Bridge
Monksfoot
Monksfoot Bridge
Longhouse Hill
Glespin
West Glespin
East Glespin
Glespinside
Darn Craig
Carmacoup
Kiln Hill
Earls Mill
Glentaggart Cottage
Kennox
Quarries (dis)
Quarry (dis)
Opencast Workings
Dismantled Railway
Douglas Water
Podowrin Burn
Smithy Burn
Windrow Burn
Robskill Burn
Carmacoup Burn
Waterfall
A70
MS
FB
Sch
Sprs

Legend:

- Initial Design Layout - Overhead Line
- Layout 1
- Layout 2
- Final Layout - Proposed Overhead Line Route
- Preferred Route
- Preferred Route Option

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
00	25/07/2022	First Draft	TM	AP	RB

Kennoxhead Wind Farm Connection

RSK

TITLE: Figure 2: Kennoxhead Wind Farm to Coalburn Substation Overhead Line - Design Iterations
Map 2 of 4

ID:rev1Design_Iterations220725_Figure 2: Kennoxhead Wind Farm to Coalburn Substation Overhead Line - Design Iterations

0 0.25 0.5
Kilometres

Scale: 1:15,000 @ A3

2

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