



**SP ENERGY
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Glenmuckloch to Glenglass Reinforcement Project Summary of Feedback from Consultation

SP Energy Networks

August 2022



ScottishPower Energy Networks

**Glenmuckloch to Glenglass
Reinforcement Project**
**Summary of Feedback from
Consultation**

Final report

Prepared by LUC

August 2022

ScottishPower Energy Networks

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10191

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Chapter 1

Introduction

Introduction

1.1 This document has been prepared by LUC on behalf of SP Energy Networks (SPEN), to present the findings of a consultation event on the Glenmuckloch to Glenglass Reinforcement Project (GGRP) undertaken between November 2021 and January 2022. Subsequent discussions with interested parties took place into March 2022 and are also reported within this document.

1.2 The purpose of the consultation was to provide an update on the GGRP, detailing the changes that have been made to the project in the intervening period since Scoping was undertaken for the Environmental Impact Assessment (EIA) in December 2019, and to provide an update on the environmental surveys and the updated GGRP design.

1.3 This document reports on the feedback received from statutory and non-statutory consultees and members of the public during the consultation, addresses feedback received and seeks to demonstrate how this feedback has influenced the GGRP. It is not the intention of this document to repeat information already contained within the Routeing and Consultation Report and EIA Scoping Report (both of which area available on the project website¹) although some details may be repeated to provide sufficient context. This document should therefore be read with reference to the previous reports.

1.4 SPEN is required to connect the consented Glenmuckloch Pumped-Storage Hydro project and other wind farm projects in the vicinity to the existing electricity transmission network. The GGRP will require the submission of an application for consent under section 37 of the Electricity Act 1989 and deemed planning permission. This will be determined by Scottish Ministers with the process being administered by the Scottish Government Energy Consents Unit (ECU).

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

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

Description of the GGRP

1.6 To meet its licence obligation, SPEN is proposing a new 132 kilovolt (kV) OHL between a new substation at Glenmuckloch and the existing substation at Glenglass. The new substation and OHL are located in Dumfries and Galloway, approximately 5km west of Sanquhar.

The New Substation

1.7 A new substation is proposed at Glenmuckloch as part of the GGRP. In addition to providing a point of connection for the Glenmuckloch Pumped-Storage Hydro project and other wind farm projects, the substation will also be designed with sufficient space to allow for the connection of additional schemes.

The New Overhead Line Connection

1.8 The new OHL will be supported on L7 lattice steel tower which have a typical height of 27m. The 'span' (i.e. distance between towers) will be between 230m and 250m, but can be increased if there is a requirement to span something such as a river or loch. The towers are fabricated from galvanised steel and will turn a dull grey colour after about 18 months. The route will be approximately 10km in length.

1.9 In addition to the new steel towers, the application for Section 37 consent will also include ancillary works including access roads, working areas, laydown areas/construction compounds, winching/pulling areas, watercourse crossings and forestry wayleaves.

SP Energy Networks

1.10 SPEN owns and operates the electricity transmission and distribution networks in central and southern Scotland through its wholly-owned subsidiaries SP Transmission Plc (SPT) and SP Distribution Plc (SPD). Its transmission networks are the backbone of the electricity system in its area, carrying large amounts of electricity at high voltages across long distances. The distribution networks are local networks, which take electricity from the transmission grid and bring it into the heart of communities. SPEN's transmission network in Scotland consists of 133 substations, more than 4,000km of OHLs and more than 320km of underground cables. The electricity is then delivered via the distribution network which has over 150 substations and in excess of 100 grid supply points which serves approximately two million customers in Southern and Central Scotland.

1.11 As transmission licence holder for Southern Scotland, SPEN is required under Section 9(2) of the Electricity Act 1989 to:

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

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

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

"(a) to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

(b) to do what it reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or any such flora, fauna, features, sites, buildings or objects."

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

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

SPEN's Commitment to Engagement

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

1.17 SPEN attaches great importance to the effect that its works may have on the environment and on people. In seeking to achieve 'least disturbance', SPEN is keen to engage with key stakeholders including local communities and

others who may have an interest in the GGRP. This engagement process begins at the early stages of development of a project to ensure that the project design balances the views of stakeholders and communities with SPEN's statutory obligations and continues into construction once Section 37 consent has been granted.

1.18 In Scotland, the requirements for public consultation in relation to applications for Section 37 are set out in guidance which was issued in February 2022². However, at the time the consultation took place, guidance on consultation was not prescriptive, but Scottish Ministers encouraged developers to follow consultation principles as set out within the Town and Country Planning (Development Management Procedure) Regulations (Scotland) 2013 and the relevant provisions of the Town and Country (Scotland) Act 1997 (as amended). The consultation undertaken has met the requirements of the February 2022 guidance and, as required, a Pre-Application Consultation Report will be prepared to accompany the application for consent for the GGRP.

1.19 SPEN's approach to stakeholder engagement for major electrical infrastructure projects is outlined Chapter 2 of SPEN's Approach to Routeing and Environmental Impact Assessment document³. SPEN aims to ensure effective, inclusive and meaningful engagement with the public, local communities statutory and other consultees and interested parties through four key engagement steps:

- Pre-project notification and engagement with consenting bodies, planning authorities, and statutory consultees;
- Information gathering to inform the routeing stage;
- Obtaining feedback on the emerging route options and preferred route; and
- The EIA stage.

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

1.21 Due COVID-19 restrictions regarding face to face interactions in place at the time, the November 2021 public consultation and stakeholder engagement took place online using a virtual consultation room developed by LUC.

² Energy Consents Unit Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1981 (<https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/documents/>)

³ SP Energy Networks (May 2021) Approach to Routeing and Environmental Impact Assessment, Version 2, Available [online] at: https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_Document_2nd_version.pdf

Chapter 2

The Consultation

Consultation Strategy

- 2.1** SPEN's consultation strategy for the GGRP is founded on a premise of consulting on proposals at each stage of the development process, ensuring that all stakeholders and individuals with an interest are kept up to date and, most importantly, have a chance to influence the development of the project.
- 2.2** A fundamental part of this is reporting back to both stakeholders and decision makers on how the feedback received has influenced the development of the project.
- 2.3** The GGRP was previously known as the Glenmuckloch 132kV Connection Project, and a routeing exercise was undertaken in 2018, comprising a review of environmental, technical and economic considerations and the application of established step by step routeing principles to identify and appraise potential route options to establish the 'preferred' route for the new 132kV OHL. Once the preferred route was confirmed, SPEN consulted on the proposals for the project in the Glenmuckloch 132kV Connection Project Routeing & Consultation Report (January 2019) which presented the findings of the initial routeing study. This comprised a review of environmental, technical and economic considerations and the application of established step-by-step routeing principles to identify and appraise potential route options to establish the 'preferred' route for the 132kV OHL.
- 2.4** Following identification of a preferred route, consultation with the general public, as well as with the local authority and consultees was carried out on the preferred route from 26th February to 26th March 2019. Exhibitions were held in Kirkconnel and Sanquhar in February 2019 with representatives of SPEN and LUC in attendance.
- 2.5** No objections were raised from any of the consultees and feedback received through the consultation processes was taken account of by SPEN through a review process, culminating in the 'proposed' route to be progressed to the EIA Scoping stage.
- 2.6** An EIA Scoping report was prepared in December 2019. Scoping is an early stage in the EIA process, the objective of which is to ensure the assessment process focuses on the likely significant effects associated with construction and operation of a project. Scoping also provides an opportunity for consultees to comment on the proposed methodologies for

the EIA, identify sources of baseline information, and raise any specific issues requiring consideration in the EIA.

2.7 In the intervening period since EIA Scoping, extensive field work has been undertaken across the proposed route of the OHL and at the location of the new Glenmuckloch substation. This has included surveys for landscape and visual amenity, forestry, ecology, ornithology, hydrology and peat, cultural heritage, and traffic and transport. Informed by the feedback from the first round of consultation, including ongoing discussion with landowners and consultees, the findings of the environmental work together with geotechnical surveys and input from SPEN technical teams, the location of the new Glenmuckloch substation and the route of the OHL were refined to allow further consultation to take place at the end of 2021.

2.8 More information about the process followed to select the preferred route and proposed scope of the EIA for the GGRP can be found in the Routeing and Consultation Report (January 2019), the Summary of Feedback from First Round of Consultation Report (November 2019) and the EIA Scoping Report (December 2019).⁴

Consultation November 2021

2.9 Whilst SPEN would usually engage with communities face-to-face, due to the COVID-19 pandemic, the consultation was run online in a virtual village hall, in line with Scottish Government good practice guidance.

2.10 The virtual consultation started on Monday 22nd November 2021 and was available to view until Sunday 19th December 2021. After this point, the information remained online and available to download, with the closing date for consultation responses set for midnight on Sunday 16th January 2022.

2.11 The focus of the consultation was to provide an update on the GGRP, detailing the changes that had been made since EIA Scoping, and provide an update on the environmental surveys and the updated GGRP design. An online feedback form requested views on:

- the proposed route alignment for the OHL between the proposed location of the new Glenmuckloch substation and the existing Glenglass substation;
- the proposed location of the new Glenmuckloch substation; and
- any other issues, suggestions or feedback for SPEN.

2.12 As part of the virtual public exhibition experience, two live chat sessions were held during the consultation period, on Tuesday 23rd November from 2-4pm and Wednesday 24th November from 5-7pm. Members of the public were also invited to contact SPEN in the following ways:

- By email:
glenmucklochprojectmanager@spenergynetworks.co.uk
- By telephone: 07516461129
- By post: Glenmuckloch Reinforcement Project, Land and Planning Team, SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA

2.13 Full details of the consultation responses received are provided in **Appendix A** and are summarised in **Chapter 3**.

2.14 A wide range of materials was produced and circulated to raise awareness of the consultation and invite people to visit the online event as detailed below. Examples of the materials are provided in **Appendix B**.

Email Announcements

2.15 On 10th November 2021 emails were sent to all statutory and non-statutory consultees to provide them with advance notice of the consultation taking place, including providing the website address and details of timescales.

2.16 In addition, on the 19th November 2021 an e-shot was issued to all consultees to advise them of the consultation going live. An image of the e-shot is provided as **Figure B.1** in **Appendix B**.

Project Leaflet

2.17 Nineteen leaflets were distributed to landowners and property owners, together with a letter from SPEN, to advise them of the consultation events. Images of the leaflet are provided as **Figure B.2** and **B.3** in **Appendix B**.

Poster

2.18 Posters were provided to local shops and other publicly accessible locations, including:

- Sanquhar:
 - Spar;
 - Nisa Local;
 - Brown Newsagents;
 - Keystore;

⁴ Available on the SPEN website:
https://www.spenergynetworks.co.uk/pages/glenmuckloch_pumped_st_orange_hydro_and_wind_farm_connections.aspx

- Dumfries & Galloway Council Customers Service Centre;
- Post Office; and
- Community (swap) Shop.
- Kirkconnel:
 - Premier (and Post Office); and
 - Co-op.

2.19 An image of the poster is provided as **Figure B.4** in **Appendix B**.

Newspaper Adverts

2.20 Adverts were placed in the Dumfries and Galloway Standard on the 9th and 16th November 2021 and the Dumfries Courier on the 12th and 19th November 2021. A copy of the advert is provided as **Figure B.5** in **Appendix B**.

SPEN Website and Virtual Consultation Website

2.21 Copies of the consultation leaflet and the virtual exhibition boards are available on the SPEN project website, together with detail on the project, including the previous consultation feedback summary report and the EIA Scoping Report. Images from the virtual exhibition are provided as **Figure B.6** in **Appendix B**.

Stakeholders

2.22 As noted above, all consultees (both statutory and non-statutory) were sent information about the project via e-shot on the day the public consultation went live. An email was also sent in advance to notify them of the forthcoming consultation and to offer the chance to discuss the project.

Public

2.23 As noted, above, the events were advertised in local newspapers and posters put up in a number of local shops etc.

Landowners

2.24 Landowners were issued with copies of the leaflet as noted above and contacted directly by SPEN's land project officer.

Local Authority and Statutory Consultees

2.25 The following statutory consultees were contacted:

- Scottish Government ECU;
- Dumfries and Galloway Council;
- Scottish Environment Protection Agency;

- NatureScot; and
- Historic Environment Scotland.

Non-Statutory Consultees

2.26 The non-statutory consultees contacted were:

- Scottish Water;
- Marine Scotland;
- Transport Scotland;
- Scottish Forestry;
- British Horse Society;
- BT;
- Civil Aviation Authority (CAA);
- Crown Estate Scotland;
- Defence Infrastructure Organisation;
- Fisheries Management Scotland;
- Joint Radio Company (JRC);
- John Muir Trust;
- Mountaineering Scotland;
- NATS Safeguarding;
- Royal Scottish Protection of Birds (RSPB);
- Scottish Rights of Way and Access Society (ScotWays);
- Scottish Wildlife Trust;
- Scottish Wild Land Group;
- Visit Scotland;
- Sustrans Scotland;
- The Health and Safety Executive (HSE);
- The National Trust for Scotland;
- BAA Glasgow Airport;
- Prestwick Airport;
- Association for the Protection of Rural Scotland; and
- The Coal Authority.

Community Councils

2.27 The following community councils were also contacted:

- Kirkconnel and Kelloholm community council;
- Royal Burgh of Sanquhar Community Council; and
- Penpont Community Council.

Chapter 3

Overview of Consultation Feedback

Representations Received

3.1 This chapter explains how the responses from the stakeholders outlined in **Chapter 2** have been summarised and presented in this document. In total four representations were received from the public through the online anonymous feedback questionnaire. One person attended the online chat. Feedback has also been received from statutory and non-statutory consultees.

Stakeholder Responses

3.2 Three statutory consultees responded to the consultation:

- SEPA;
- HES; and
- NatureScot.

3.3 Further consultation via telephone call and email letter also took place between NatureScot and NRP, the project ornithologist in January 2022, to agree the suitability of the survey work and to share data on bird species in the local area.

3.4 Responses were also received from the following organisations and individuals:

- The John Muir Trust;
- Mountaineering Scotland;
- The Coat Authority;
- British Telecommunications;
- Kirkconnel and Kelloholm Community Council; and
- Constituent MSP.

3.5 An online call with SPEN and members of Kelloholm and Sanquhar Community Councils took place on 21st March 2021. The issues raised are discussed in **Appendix A**.

3.6 SPEN are continuing to liaise with landowners to ensure that their views are taken into account in refining the OHL and substation design in the months preceding submission of the application for consent.

3.7 Consultation responses received from statutory and non-statutory consultees and the responses made by SPEN

(including any actions required through the design process) are outlined in **Tables A.1** and **A.2** of **Appendix A** (Summary of Consultation Feedback).

Key Public Feedback Themes

3.8 To maintain anonymity of members of the public who provided feedback, comments have been split into themes in **Table A.3** of **Appendix A**. Key themes identified included:

- Comments on the possible impact on aircraft flying to/from Prestwick airport.
- Comments in relation to the field survey work which has been undertaken and the data which has been collected (see further detail below).
- Comments on the rationale for the use of steel towers as opposed to wood poles or an underground cable.
- Visibility of the OHL and new substation and the effects on landscape and visual amenity, including residential properties.

Environmental Survey Data Report

3.9 In response to the second point noted above and a specific request from a member of the public, the raw data from environmental surveys undertaken on the project between 2019 and 2021 was published in a report on the SPEN website⁵. The report included data on the following topics:

- Ecology;
- Ornithology;
- Hydrology and peat;
- Forestry; and
- Cultural heritage.

3.10 The data was presented for information purposes only and no attempt was made to provide a detailed analysis of the environmental effects of the proposals. The data has informed the infrastructure design and will subsequently be used to inform the assessments and detailed analysis of environmental effects undertaken as part of the EIA. No confidential data on the location of breeding and roosting sites for legally protected species that are listed in Schedule 1 of the Wildlife & Countryside Act 1981 (as amended) was provided within the report. Similarly, details of resting sites of species protected by Schedule 5 of the Wildlife & Countryside

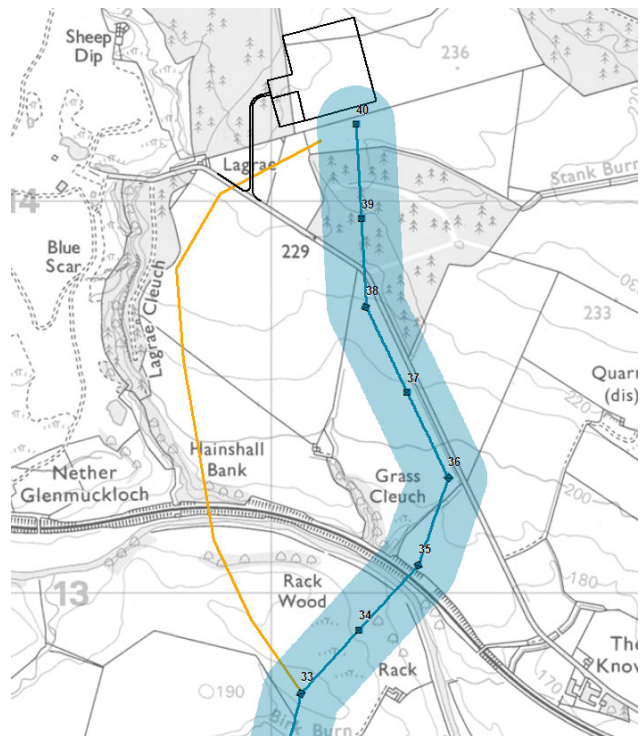
Act, or the provisions of the Conservation (Natural Habitats, &c) Regulations were not provided.

How Feedback Has informed the Design

3.11 SPEN has carefully considered the feedback received to understand how this could influence the final design of the GGRP. This has included the following possible design changes where were reviewed by the project team.

Alternative Design Suggestion – North

3.12 At a meeting with Kirkconnel and Kelloholm Community Council on Monday 21st March 2022 it was suggested that SPEN review the possibility of changing the route of the northern section of the OHL at the Glenmuckloch substation end by moving towers 34 to 39 further west as shown as the orange line on the image below.



3.13 This suggested realignment was reviewed by the specialist team and was considered to be less preferable to the final alignment for a number of reasons as summarised below:

⁵ https://www.spenergynetworks.co.uk/userfiles/file/Environmental%20Survey%20Data%20Report_November%202021.pdf and

https://www.spenergynetworks.co.uk/userfiles/file/Environmental%20Survey%20Data%20Report_Figures_November%202021.pdf

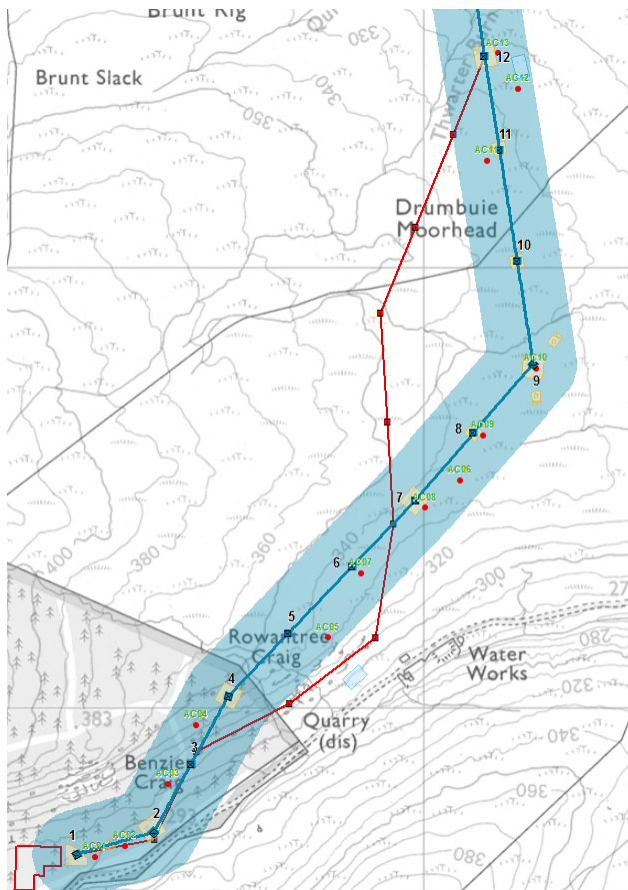
- Cultural heritage: the proposed realignment cuts through a medieval/post-medieval farmstead and is quite close to a likely prehistoric cairn.
- Forestry: the proposed realignment crosses two areas of ancient woodland.
- Peat: based on previous survey and satellite imagery the proposed realignment would be required to cross several areas of peat.
- Landscape: loss of ancient woodland generally should be avoided due to its contribution to landscape character.
- Ecology: protected species may be present in the woodland although this was not surveyed so cannot be confirmed.

3.15 This suggested realignment was reviewed by the specialist team and was considered to be less preferable to the final alignment for a number of reasons as summarised below:

- Cultural heritage: closer to scheduled St Connel's Church.
- Hydrology: the route goes within 50m of some watercourses.
- Landscape: the alignment in the south is slightly less sympathetic to the topography, so it is likely to be slightly more visible/prominent from some of the viewpoints (notably more prominently skinned in views from VP7 Southern Upland Way and VP11 Minor Road, Euchan Water Valley).

Alternative Design Suggestion – South – Option 1

3.14 At the request of the relevant landowner, SPEN also reviewed an alternative design at the southern end of the route, as shown in red in the image below.



Chapter 4

Conclusions and Next Steps

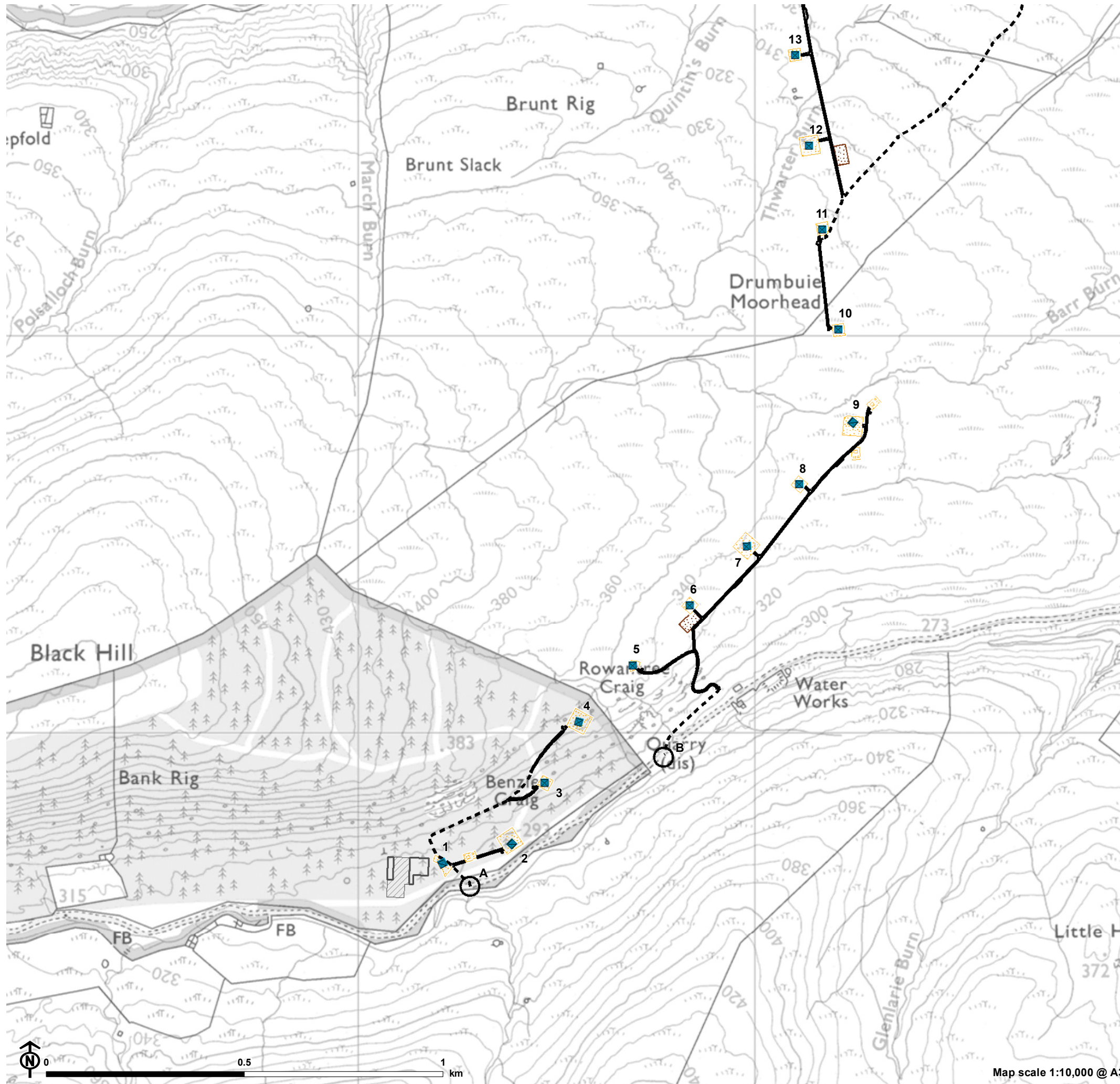
Confirmation of the Final Design

4.1 Following the findings of the routeing study and consideration of the feedback received during the consultation which took place at the routeing stage, the EIA Scoping consultation and the event which took place between November 2021 and January 2022 (and subsequent discussions), SPEN has finalised the design of the GGRP (see **Figure 4.1**). This has taken account of feedback from consultees and landowners and is considered to be the route that will cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it.

Next Steps

4.2 The EIA for the GGRP is underway, and it is anticipated that the application for consent under Section 37 of the Electricity Act 1989 will be submitted to the Scottish Government ECU later in 2022. Following the submission of the Section 37 application, further public consultation will be carried out by the Scottish Government ECU.

Figure 4.1.1: The Glenmuckloch to Glenglass Reinforcement Project Final Design



- Overhead line infrastructure**
- Tower (steel lattice tower)
- Access to proposed towers and temporary work areas**
- Existing access track
 - New access track
 - Access point
 - ▨ Laydown area
 - ▨ Working area
- Glenglass substation (does not form part of this application)
- ▨ Existing substation
 - Proposed substation extension

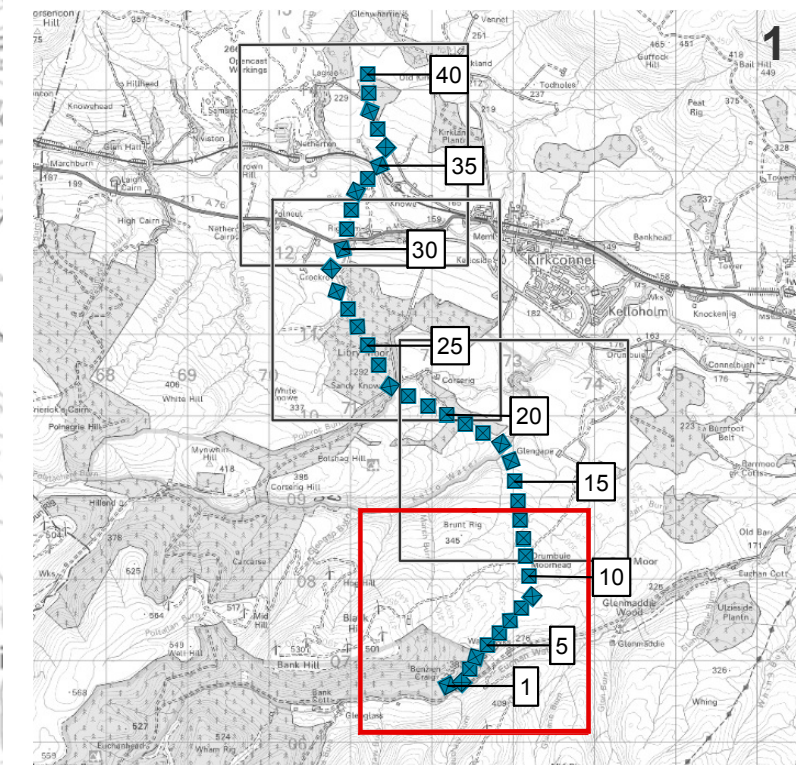
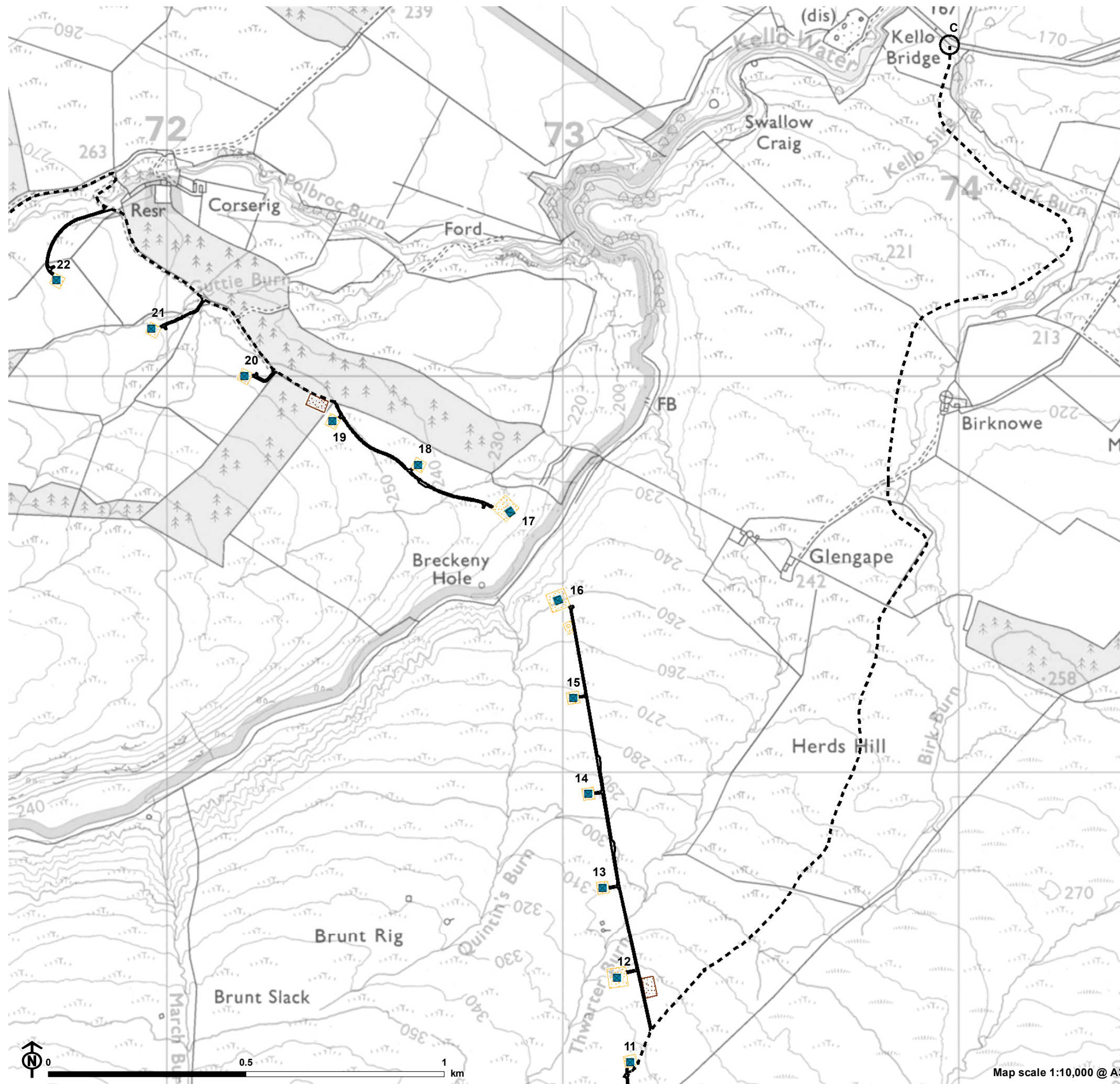


Figure 4.1.2: The Glenmuckloch to Glenglass Reinforcement Project Final Design



- Overhead line infrastructure**
- Tower (steel lattice tower)
- Access to proposed towers and temporary work areas**
- - - Existing access track
 - New access track
 - Access point
 - ▨ Laydown area
 - ▩ Working area

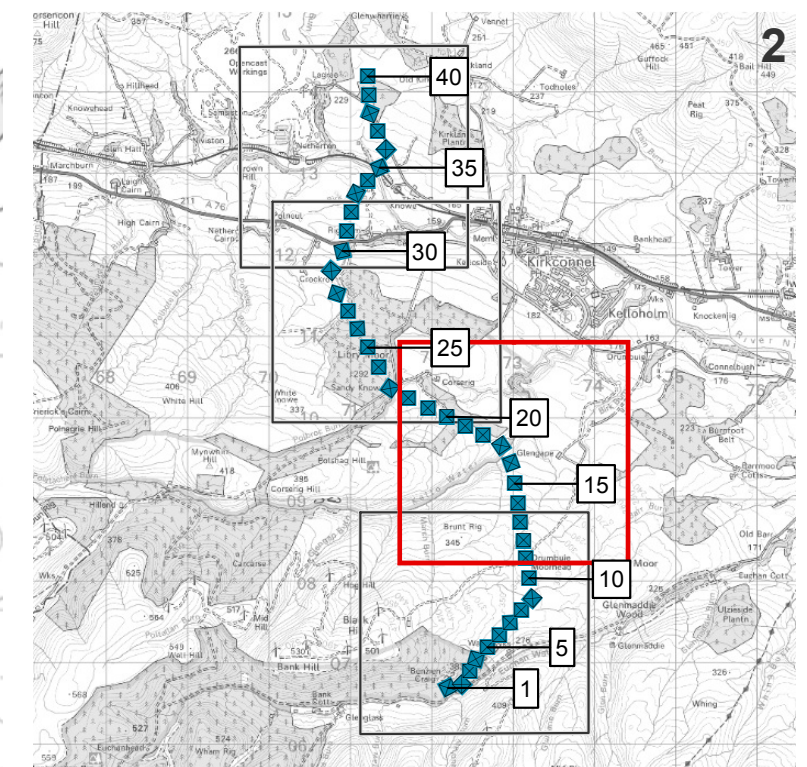
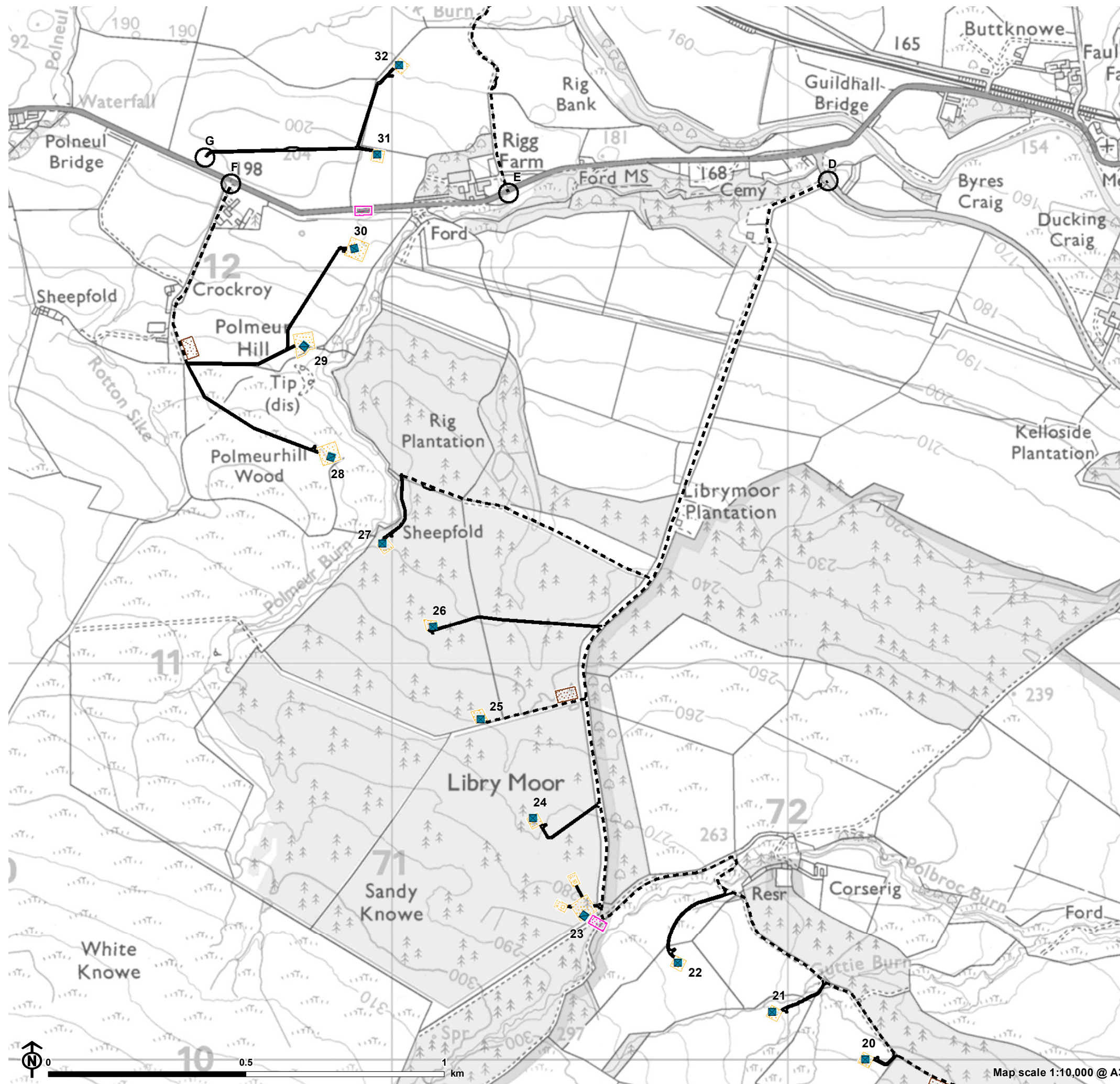
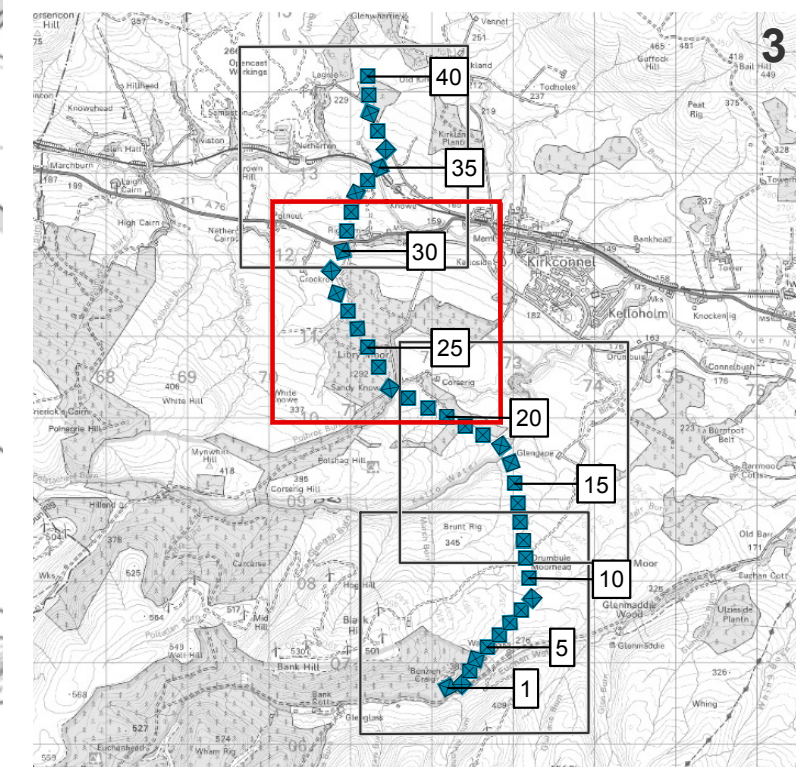


Figure 4.1.3: The Glenmuckloch to Glenglass Reinforcement Project Final Design



- Overhead line infrastructure**
- Tower (steel lattice tower)
- Access to proposed towers and temporary work areas**
- - - Existing access track
 - New access track
 - Access point
 - ▨ Laydown area
 - ▨ Scaffolding
 - ▨ Working area



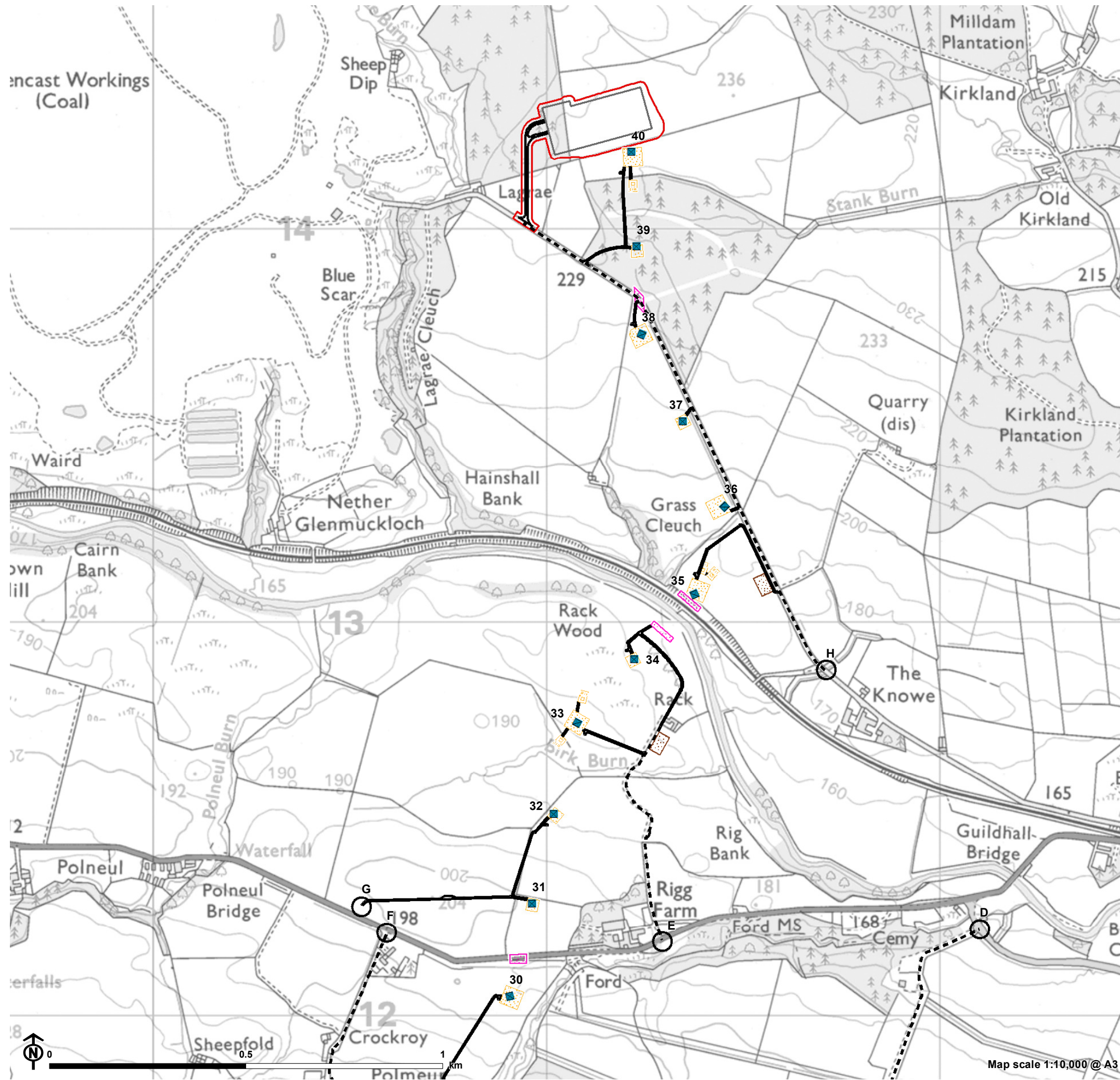


Figure 4.1.4: The Glenmuckloch to Glenglass Reinforcement Project Final Design

Overhead line infrastructure

- Tower (steel lattice tower)

Access to proposed towers and temporary work areas

- - - Existing access track

- New access track

- Access point

- ▨ Laydown area

- ▨ Scaffolding

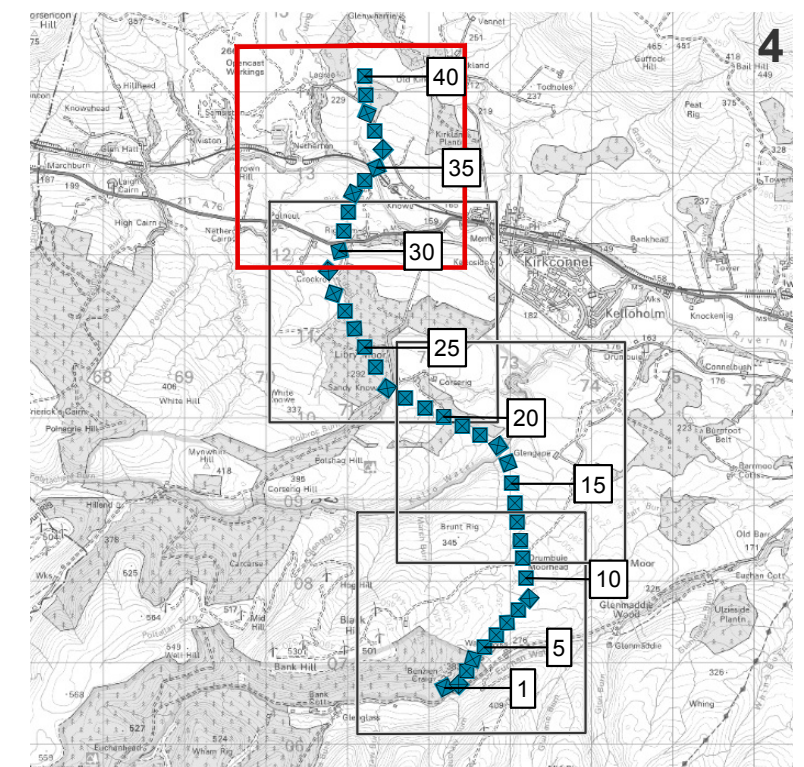
- ▨ Working area

Proposed Glenmuckloch substation

- Glenmuckloch substation

- ▭ Glenmuckloch substation site boundary

- Glenmuckloch substation new access track



Appendix A

Summary of Consultation Feedback

A.1 Tables A1, A2 and A3 provide a summary of the feedback received from statutory consultees, other consultees, and members of the public respectively.

Table A.1: Summary of Consultation Feedback from Statutory Consultees to Consultation in November 2021

Consultee	Summary of Feedback	Response / Comments
SEPA (Response received 30/11/21)	<p>Noted the preferred corridor has been amended slightly and more detail has now been provided on the location of the proposed infrastructure.</p> <p>In relation to the water environments, noted the towers will be located away from the larger watercourses such as the River Nith and Kello Water. SEPA assume more detailed versions of the plans will show that there will be suitable buffers between construction works and towers near the smaller watercourses. This includes T21, T25 and T39.</p> <p>SEPA also has an interest in relation to impacts on peat and groundwater dependent terrestrial ecosystems (GWDTes). Excavations should be shown to avoid areas of deep peat and good quality wetland habitats. Noted they are happy to provide further advice regarding this, if the peat probing and NVC survey information (with the infrastructure shown on top) can be shared with them.</p> <p>Welcomed that consideration has been given to access at this early stage but state it would be helpful if the plans submitted with the application confirmed the methods of access (removable boards, temporary floated tracks, temporary cut tracks etc). as these effect the level of impact the proposed development will have on the issues SEPA have an interest in.</p>	<p>Detailed plans showing the infrastructure and watercourses and associated buffers will be provided in the EIA Report as part of the Hydrology, Hydrogeology and Peat chapter.</p> <p>Where possible, a 50m buffer from infrastructure has been maintained on all watercourses. However, as noted in the response there are a few locations where this has not been possible. This is primarily because the OHL route contours along the base of a slope in places, with multiple watercourses running off the hillside.</p> <p>In further direct consultation with SEPA, the hydrological consultant (Kaya consulting) has been advised that, whilst it may be possible to provide justification to site infrastructure within 50m of a watercourse, this is dependent on a number of factors including what the watercourse is and steepness of the site and should be considered the 'exception' rather than the 'rule'. As such, where it has not been possible to maintain a 50m buffer away from all infrastructure this will be set out in detail in the EIA Report, including setting out additional mitigation at these locations if required.</p> <p>Extensive peat probing has been undertaken along the route of the OHL, as have surveys for NVC and GWDTes. Where possible, areas of deep peat and sensitive habitats have been avoided and follow up discussions are taking place with SEPA to provide the requested maps.</p> <p>Full details of the accesses and methods/types of construction will be provided in the EIA Report.</p>
HES (Response received 13/12/21)	<p>Confirmed they have not identified any potential significant effects on heritage assets and are content with the alterations being made to the proposal.</p>	<p>No further action required.</p>
NatureScot (Response received 27/01/22)	<p>Confirmed their position in relation to the proposal remains the same as to their scoping response provided on 16th March 2020.</p> <p>With respect to Ornithology, NatureScot are satisfied black grouse numbers are relatively low within the area and that the data obtained is adequate to inform the assessment following the provision of the GGRP Environmental Survey Data Report prepared by LUC in</p>	<p>In January 2022 NRP (ornithological consultants on the project) undertook further direct consultation with NatureScot who have confirmed they are happy with the approach to the surveys and assessment. Outline details of appropriate species protection plans will be provided in the EIA Report.</p>

Consultee	Summary of Feedback	Response / Comments
	<p>November 2021 and published on the SPEN project website⁶, and following further discussions with the ornithology team.</p> <p>Confirmed they are satisfied with regards to waterfowl flight activity and since these are likely to be low, flight activity surveys are not necessary.</p> <p>Advised the wader survey work conducted is adequate to assess wader sensitivity along the route.</p> <p>Requested that NatureScot are consulted when developing the species protection plans for particular species such as black grouse and waders to ensure adequate mitigation is put in place along the route corridor.</p>	

Table A.2: Summary of Consultation Feedback from Non-Statutory Consultees to Consultation in November 2021

Consultee	Summary of Feedback	Response / Comments
John Muir Trust (Response received 15/11/21)	Acknowledged receipt of the consultation email sent 10/11/21 and confirmed the team will look at the project documentation in due course and comment if necessary.	No further response received. No further action required.
Mountaineering Scotland (Response received 22/11/21)	Confirmed they have no comments to make at this time.	No further action required.
The Coal Authority (Response received 26/11/21)	Confirmed the site falls outside the coalfield area and therefore have no comments or observations to make on this proposal.	No further action required.

⁶ https://www.spenergynetworks.co.uk/pages/glenmuckloch_pumped_storage_hydro_and_wind_farm_connections.aspx

Consultee	Summary of Feedback	Response / Comments
<p>British Telecommunications (Response received 05/12/21)</p>	<p>Confirmed the proposal should not cause interference to BT's current and presently planned radio network.</p>	<p>No further action required.</p>
<p>Kirkconnel and Kelloholm Community Council (KKCC) (Response received 14/01/22)</p>	<p>Confirmed their support for the project along with the range of wind farm developments in the surrounding area, both in terms of supporting the Scottish Government achieve their Net Zero Targets and the economic opportunities and benefits they provide to the community.</p> <p>KKCC highlighted the new proposed route is now located closer to the village of Kirkconnel and the homes of a number of residents as well as being located much closer to popular walking areas and areas of natural beauty. KKCC feel strongly the new proposed route will have an adverse visual impact on the area and on local residents and understand that landowners have similar views. Therefore, an underground route that is less obtrusive would be the community's preference.</p> <p>Raised no objections to the development of a substation at Glenmuckloch provided that the link to Glenglass is via underground cables as opposed to the proposed 10km OHL detailed in the consultation documents.</p> <p>Raised concerns regarding the potential for impacts on natural habitats and wildlife in the area, noting that black grouse and other species are present in the area.</p> <p>KKCC considers there is an economic impact for homeowners as a result of the visual impact of the Proposed Development on the homes of residents and holiday lets, potentially reducing the value of their property.</p> <p>KKCC recognise that the cost of installing an OHL is substantially less than a possible underground route but urge this to be reconsidered in light of the perceived visual, economic and environmental impacts the</p>	<p>SPEN's approach to routeing is set out in its published document Approach to Routeing and Environmental Impact Assessment. . On the basis of the detailed routeing work undertaken to date to develop a proposal for the GGRP, informed by the previous stakeholder consultation undertaken, SPEN remains of the view that the use of an OHL on the route of the GGRP meets the statutory duties under the Electricity Act 1989 and the transmission license holder obligations.</p> <p>A cable routing study was undertaken which considered two cable route options. Both cable route options that were explored, although technically feasible, had key disadvantages including crossing numerous watercourses which would require extensive civil works, with new access roads required to reach either side of the crossing positions, and the potential for significant and extensive infilling works. The steep sections of elevational change identified pose significant engineering challenges.</p> <p>The close proximity of the Sandy Knowe and Sanquhar windfarms would bring difficulties of negotiating a cable route through areas that will be operational before the cable route is installed would be complex and costly. Shallow rock is also present and where it is not possible for this to be broken up, alternative cable route would require additional haul roads to be constructed.</p> <p>Extensive ecological and ornithological surveys have been undertaken as part of the EIA for the GGRP and the scope and appropriateness of these has been confirmed with NatureScot. Outline details of appropriate species protection plans will be provided in the EIA Report.</p> <p>SPEN recognise that the visual impact of an overhead line may be an issue for many local communities and individuals and our approach is to maximise the distance of the final route from properties wherever possible, including the principal views from properties. Individual properties have been mapped and considered during the routeing process and residential visual amenity impact has been mitigated through micro-sitting of individual towers where possible.</p>

Consultee	Summary of Feedback	Response / Comments
	<p>current proposal will have on homeowners, the local community and the natural beauty and wildlife of the area.</p>	
<p>Constituent MSP (Response received 16/01/2)</p>	<p>Raised concerns that the environmental survey data is incomplete as access across part of the route was not possible and therefore no ecological data has been gathered for this part of the route over the past three years.</p> <p>Disagreed with the statement in the Environmental Survey Data note <i>"that the data obtained is representative of the relevant study areas and is sufficient to undertake a thorough and robust assessment for the EIA."</i>, on the basis access has been limited to part of the proposed route.</p> <p>Raised concerns about the impact on ornithology in the area and specifically on protected species in the immediate vicinity of the proposed works. It is considered that the data gained from the surveys in relation to black grouse does not meet the standards required.</p> <p>Raised concern regarding perceived mismatch between the findings of the surveys and their conclusion that a <i>"lack of suitable habitat, informed by the desk study, confirmed that no breeding raptors or owls were present,"</i> and the practical experience of locals familiar with Drumbie Hill who confirmed both are present.</p> <p>Consider that the undergrounding of any necessary works relating to the proposal should be reconsidered by SPEN given the concerns that are shared by the community in the immediate vicinity.</p>	<p>Extensive ecological and ornithological surveys have been undertaken as part of the EIA for the GGRP, including to the full route of the proposal. The scope and appropriateness of the surveys and the data collected has been confirmed with NatureScot by telephone call and email as noted above.</p> <p>In developing its proposals for the project, SPEN has had to consider the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest, and of protecting sites, buildings and objects of architectural interest. SPEN must also do what it reasonably can to mitigate any effect of the proposals on these features. The project also requires to be compatible with SPEN's duties to develop and maintain an economic and efficient transmission system. The costs of proposals therefore require to be in keeping with these duties. The same duties in terms of mitigating environmental effects and being economic and efficient would also apply to any alternative proposals for the Project (or sections of it) whether overhead or underground.</p> <p>Therefore, in considering whether lines should be placed underground to obtain the benefits of reductions in landscape, visual or environmental effects, SPEN must balance those reductions in effects against the costs (economic and environmental) and the technical challenges of undergrounding.</p> <p>Undergrounding is generally significantly more expensive than building overhead lines, but this varies considerably from project to project depending on a range of factors, including whether the line is buried in roads, directly in open agricultural land or whether more complex tunnelling and civil engineering is required. Repair impacts are also higher than for overhead lines, as are the costs associated with any later uprating. Based on current market rates, the construction cost for 132kV underground cabling is estimated, depending on topology and geology, to be between three and five times the cost for a 132kV double circuit steel tower installation (as proposed on this Project), as opposed to the equivalent cable. The actual multiplier depends on many factors including, but not limited to, the following: circuit rating, circuit length, installation method, environmental issues, circuit cable lengths in comparison with circuit OHL lengths, ground conditions and access requirements.</p>

Table A.3: Summary of Consultation Feedback from Public Representation to Consultation in November 2021

Key Themes / Topics	Issue Raised	Response / Comments
Impact to aircraft using low level route towards Prestwick	<p>Raised concerns that the OHL will cross a valley used as an unofficial low level route for light aircraft into Glasgow Prestwick Airport travelling to and from the south via Dumfries, following the River Nith.</p> <p>Asked if this impact has been assessed and if so, what markings or warnings would be added to make the pylons and cables visible to light aircraft to mitigate the risk of collision.</p>	<p>An independent review undertaken by Pager Power confirmed that there would be no adverse impact to Prestwick Airport as a result of the GGRP and therefore no requirement for markings or warnings on the OHL towers. Prestwick Airport has also commissioned their own review of potential impacts to aircraft however at the time of writing the findings of this review have not been provided to SPEN.</p>
Surveys and data	<p>Concerns raised relating to access to undertake surveys and the data obtained, particular in relation to ecology, peat and ornithology.</p>	<p>Extensive peat, ecological and ornithological surveys have been undertaken as part of the EIA for the GGRP and the scope and appropriateness of these has been confirmed with NatureScot and SEPA. As such it is considered that there is adequate information available to support the EIA for the GGRP.</p>
Proposed route and potential for undergrounding	<p>One respondent commented that the proposed route is likely the best compromise for an OHL but questioned why an underground cable was not being used.</p>	<p>See above response in Table A.2 in relation to undergrounding.</p>
Landscape and Visual	<p>One respondent does not wish to see steel towers erected in the rural area, noting that this would be out of keeping with the landscape regardless of the route.</p> <p>Another commented that the map was unclear but hoped the route would follow the ground contours and queried if this would result in the steel towers being less visible.</p> <p>With respect to the new Glenmuckloch substation, one consultee commented that the location looked quite far up the hillside but hoped the visual impact would be kept to a minimum.</p> <p>One respondent raised concern that the hillsides in the area are being overrun with tracks, steel towers and OHLs to accommodate wind farm developments to the detriment of the overall visual look of the</p>	<p>As detailed in SPEN's Approach to Routeing and Environmental Impact Assessment document, the overall approach is based on the premise that the predominant effect of an OHL is visual. This is as a result of its scale relative to objects in the vicinity such as buildings and trees. There is no technical way of reducing this other than choice of towers and only limited ways of achieving screening through planting, so the most effective way of causing the least visual disturbance is through careful routeing.</p> <p>The development of OHLs will inevitably result in a number of landscape and visual effects which are difficult to avoid. Careful routeing of OHLs is considered the best way to mitigate these effects. On this basis OHL routeing is undertaken by landscape architect using professional judgement, informed by both desk and field work from publicly accessible locations reflecting the Holford Rules⁷. The routeing process for the GGRP has been documented and consulted on at the Routeing and Consultation stage (January 2019), at EIA Scoping (December 2019), and again in November 2021. These documents and information can be viewed on the SPEN project website⁸. As set out in the Scoping Report,</p>

⁷ The Holford Rules are accepted guidance for routeing OHLs in the UK.

⁸ https://www.spenergynetworks.co.uk/pages/glenmuckloch_pumped_storage_hydro_and_wind_farm_connections.aspx

Key Themes / Topics	Issue Raised	Response / Comments
	<p>area. The consultee would welcome a virtual tour of how the proposal would look in the landscape.</p>	<p>the route has been designed to be sympathetic to the landscape, including ground contours, for example running parallel to them across Drumbuie Moorhead.</p> <p>Guidance on siting substations is based on the Horlock Rules for the Siting and Design of Substations⁹ as detailed in SPEN's Approach to Routeing and Environmental Impact Assessment document. This includes the requirement to consider use of natural features such as woodland and ground form to avoid intrusion in the landscape, effective use of space, consideration of alternative designs, and the relationship between the substation and nearby towers/connections.</p> <p>Detailed visualisations will be provided in the EIA Report which will demonstrate how the GGRP will appear in the existing landscape.</p>
<p>Alternative option to a steel tower OHL</p>	<p>One respondent commented that the OHL should instead either be undergrounded or constructed using traditional wood poles and stated that the use of steel towers will destroy the natural amenity of the area.</p> <p>Another respondent asked for the OHL to be undergrounded and raised a question as to why an OHL is being considered in this area when these are not used on wind farm sites. The consultee gave the example of subsea interconnectors that work over thousands of miles and suggested that the use of OHLs are being used as a cheap opt out.</p>	<p>See above response in Table A.2 in relation to undergrounding.</p> <p>The OHL is double circuit and therefore requires to be supported on steel towers rather than wood poles. The required capacity for this connection is such that a double circuit overhead line is required. Double circuits are typically carried on steel lattice towers. Single circuits operating at 132kV will typically be carried on 'trident' wood poles meaning that two separate wood pole overhead lines would be required to facilitate this connection.</p>


⁹ Devised in 2003 and updated in 2006 by National Grid Company (NGC) plc.

Appendix B

Consultation Materials

B.1 Examples of the consultation material are provided below, including the e-shot, leaflet, poster, newspaper advert, and images from an example virtual consultation room.

Figure B.1: E-shot



Good Morning,

SP Energy Networks (SPEN) is running an online consultation to provide an update and seek feedback on the proposed Glenmuckloch to Glenglass Reinforcement Project located in Dumfries and Galloway. The project will involve the installation and operation of a new 132 kilovolt (kV) steel tower overhead line (CHL) from a new substation at Glenmuckloch, which is required to connect the consented Glenmuckloch Pumped-Storage Hydro project and other wind farm projects, to the existing Glenglass substation.

An Environmental Impact Assessment (EIA) for the project is currently underway and Land Use Consultants (LUC), on behalf of SPEN, is managing the EIA and consultation process. SPEN wishes to provide an update on the current proposals which have been further refined since the project was last consulted on in 2019. In addition, feedback is being sought from stakeholders, communities and landowners on the proposed alignment of the CHL and location of the new Glenmuckloch substation in advance of submission of an application for consent for the project to the Scottish Government Energy Consents Unit (ECU) in 2022.

An online virtual consultation room has been created to present information on the Glenmuckloch to Glenglass Reinforcement Project. This will be live from **Monday 22nd November 2021 to Sunday 19th December 2021** and can be accessed via the following link:

Glenmuckloch to Glenglass Reinforcement Project Consultation Room

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

- The proposed route alignment for the CHL between the proposed location of the new Glenmuckloch substation;
- The proposed location of the new Glenmuckloch substation; and
- Any other issues, suggestions or feedback you would like SPEN to consider.

We will also be on hand to answer any questions at the following times via the virtual exhibition live chat facility:

- **Tuesday 23rd November from 2pm – 4pm**
- **Wednesday 24th November from 5pm – 7pm**

Further information relating to this project, including the Routing and Consultation Document and EIA Scoping Report which were consulted on in 2019, can be obtained from the SPEN project website using the link below:

[Glenmuckloch to Glenglass Reinforcement Project](#)

If you have any comments on the current proposals, you can submit these to SPEN via email or in writing to the following addresses. Please note these comments must be submitted no later than midnight on **Sunday 18th January 2022**. If contacting SPEN by post, please allow up to 7 days for these to be received as it may not be possible to consider comments received after this date.

GlenmucklochProjectManager@spenergynetworks.co.uk

Glenmuckloch Connections Project
Land and Planning Team
SP Energy Networks
55 Fullarton Drive
Glasgow
G32 8FA

Please note that comments provided at this stage are informal; an opportunity to comment formally to the Scottish Government ECU will follow once the Section 37 application has been submitted.

We trust that this is a helpful update on the status of the project and look forward to hearing from you should you have any comments or queries on the proposals.

Kind regards,
LUC on behalf of SP Energy Networks

Figure B.2: Leaflet (First Page)

How do I make comments or find out more information?

Our consultation will run for four weeks and the information will be available from **Monday 22nd November 2021 to Sunday 19th December 2021**. The closing date for you to send your responses to us is midnight on **Sunday 16th January 2022**. Following this date, the information will remain accessible online and available to download.

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

Visit the online virtual exhibition from Monday 22nd November 2021:
www.glenmuckglenglassohl.co.uk

In normal circumstances, we would engage with communities face-to-face through drop-in public exhibitions, however, due to the ongoing Covid 19 pandemic, we have instead prepared an online virtual consultation to replicate an in-person village hall experience. Here you can see detailed maps, read about the proposals, download the project information as a pdf, and provide feedback via the online questionnaire.

Visit the website:
www.spenergynetworks.co.uk/pages/community_consultation

Our dedicated website has lots more information. You can view or download all the project documents, including this leaflet, the Routing and Consultation Report, EIA Scoping Report, and the content of the virtual exhibition room.

Talk to us:
We will be on hand to answer any questions you may have via the live chat service on the virtual exhibition room on the following dates:
Tuesday 23rd November (2pm – 4pm)
Wednesday 24th November (5pm – 7pm)

Email us: glenmucklochprojectmanager@spenergynetworks.co.uk


Write to us: Glenmuckloch Reinforcement Project
Land and Planning Team
SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA

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

What happens next

- A** Undertake Environmental Impact Assessment of the construction and operation of the Glenmuckloch to Glenglass Reinforcement Project
- B** Submit Section 37 application for consent to Scottish Ministers with EIA Report (early 2022)
- C** Discharge of planning conditions (if consent is granted)
- D** Construction of Glenmuckloch to Glenglass Reinforcement Project

Thank you for taking the time to read this leaflet.



Glenmuckloch to Glenglass Reinforcement Project

Public Consultation Leaflet

Background

SP Energy Networks is required to connect the consented Glenmuckloch Pumped-Storage Hydro project and other wind farm projects in the vicinity to the existing electricity transmission network.

To meet its licence obligation, SP Energy Networks is proposing a new 132 kilovolt (kV) overhead line between a new substation at Glenmuckloch and the existing substation at Glenglass. The new substation and overhead line are located in Dumfries and Galloway, approximately 5km west of Sanquhar, and will be the subject of an application for consent to the Scottish Government in 2022. The connection will be supported on L7 steel towers and the route will be approximately 10km in length.

SP Energy Networks consulted on the proposals and prepared an Environmental Impact Assessment (EIA) Scoping report in 2019, which has allowed for further refinement of the project. As such, SP Energy Networks is undertaking a further consultation to provide an update on the proposals to consultees and the local community before the application is submitted to the Scottish Government for consent in 2022.




Figure B.3: Leaflet (Second Page)

Project Updates Since Last Consultation

SP Energy Networks last consulted on the project at the EIA Scoping stage in 2019, when feedback was sought from consultees on the scope of the assessments to be undertaken as part of the EIA. In the intervening period extensive field work has been undertaken across the proposed route of the OHL and at the location of the new Glenmuckloch substation. This has included surveys for landscape and visual amenity, forestry, ecology, ornithology, hydrology and peat, cultural heritage, and traffic and transport. Informed by the feedback from the first round consultation, including ongoing discussion with landowners, the findings of the environmental work together with geotechnical surveys and input from SP Energy Networks technical teams, the location of the new Glenmuckloch substation and the route of the OHL have now been refined to allow further consultation to take place.

We are now seeking your views on the detailed route alignment in addition to the substation location shown overleaf to allow us to finalise the design and EIA ahead of the proposals being submitted to the Scottish Ministers, the decision makers in this process.

More information about the process we have followed to select the preferred route and proposed scope of the EIA for the Glenmuckloch to Glenglass Reinforcement Project can be found in our Routeing and Consultation Report (January 2019) and the EIA Scoping Report (December 2019). Both reports are available on our consultation website (see back page for details).

The New Substation

A new substation is proposed at Glenmuckloch as part of the Glenmuckloch to Glenglass Reinforcement Project. In addition to providing a point of connection for the Glenmuckloch Pumped-Storage Hydro project and other wind farm projects, the substation will also be designed with sufficient space to allow for the connection of additional schemes.

The New Overhead Line Connection

The new OHL will be supported on L7 lattice steel tower which have a typical height of 27m. The 'span' (i.e. distance between towers) will be between 230m and 250m, but can be increased if there is a requirement to span something such as a river or loch. The towers are fabricated from galvanised steel and will turn a dull grey colour after about 18 months.

In addition to the new steel towers, our application for Section 37 consent will also include ancillary works including access roads, working areas, laydown areas/construction compounds, winching/pulling areas, watercourse crossings and forestry wayleaves.

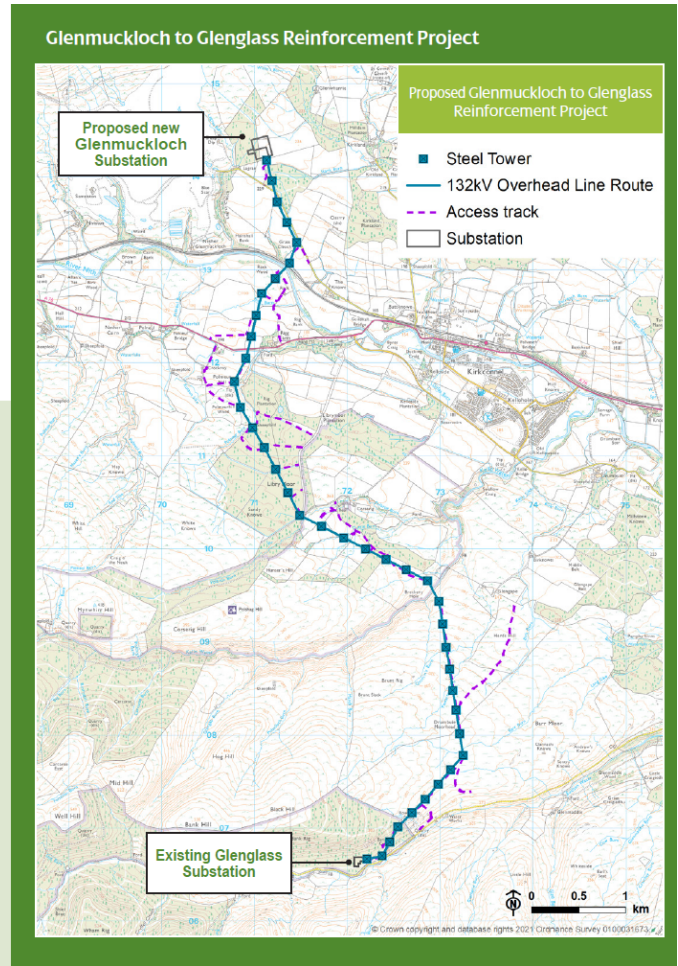
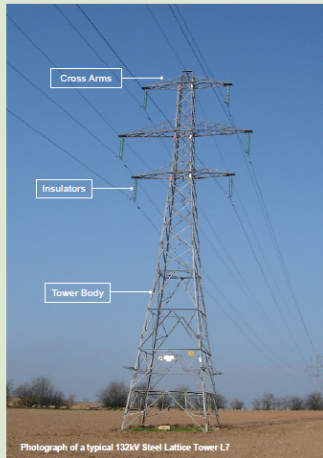


Figure B.4: Poster

Figure B.5: Newspaper Advert

Glenmuckloch to Glenglass Reinforcement Project



We'd like your views

Public consultation

New Overhead Line Connection from new Glenmuckloch Substation to Glenglass Substation

SP Energy Networks is running a consultation to provide an update to consultees and the community on the proposed 132 kilovolt (kV) overhead line between a new substation at Glenmuckloch and the existing substation at Glenglass (the Glenmuckloch to Glenglass Reinforcement Project). The overhead line will be supported on L7 steel towers from a new substation at Glenmuckloch, which is required to connect the consented Glenmuckloch Pumped-Storage Hydro and Wind Farm projects, to the existing Glenglass substation in Dumfries and Galloway.

This consultation will run for four weeks from **Monday 22nd November** to **Sunday 19th December 2021**. The closing date for submitting comments will be midnight on **Sunday 16th January 2022**. The consultation material will remain accessible online and available to download in a pdf format after the **19th December 2021** from:

www.spenergynetworks.co.uk/pages/community_consultation

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

From **Monday 22nd November**, the virtual exhibition room and a feedback form can be accessed from

www.glenmuckglenglassohl.co.uk

Consultation materials will be available to download from the webpage above from **Monday 22nd November**, and information leaflets and posters will also be distributed locally in advance of this date.

You will be able to talk to us via the live chat service on the virtual exhibition room on the following dates:	Tuesday 23rd November	(2pm-4pm)
	Wednesday 24th November	(5pm-7pm)

Comments can also be sent to the project email address: glenmucklochprojectmanager@spenergynetworks.co.uk	Or by writing to us: Glenmuckloch Connections Project, Land and Planning Team, SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA
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Please note that comments provided at this stage are informal; an opportunity to comment formally to the Scottish Government Energy Consents Unit will follow once the application has been submitted.

Figure B.6: Virtual Consultation Images



