

**SP Energy Networks**

**The Knockodhar 132kV  
Connection Project**  
Summary of Feedback from  
the Pre-Application  
Consultation

**Final report**

Prepared by LUC

October 2021



**SP ENERGY  
NETWORKS**

## SP Energy Networks

### The Knockodhar 132kV Connection Project Summary of Feedback from the Pre-Application Consultation

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# Chapter 1

## Introduction

### Purpose of this Document

**1.1** This document has been prepared by LUC on behalf of SP Energy Networks (SPEN), to present the findings of pre-application consultation on the Knockodhar 132 kilovolt (kV) Connection project.

**1.2** The pre-application consultation for the Knockodhar 132kV Connection Project was undertaken during May and June 2021 following the identification of a preferred route for the new 132kV overhead line (OHL), as seen in **Figure 1.1**. The purpose of this document is to detail the feedback received to date, address feedback received during the pre-application consultation and demonstrate how this feedback has influenced the Knockodhar 132kV Connection Project.

### The Need for the Knockodhar 132kV Connection Project

**1.3** A request for a connection to the transmission grid has been received by SPEN via NGET from the developer of the Knockodhar Wind Farm. Following consideration of the network in this area by SPEN, the proposed point of connection from the Knockodhar Wind Farm substation is to the Mark Hill collector substation via a 132kV OHL.

**1.4** The Knockodhar Wind Farm is being proposed by REG Knockodhar Limited and is located in a commercial forestry plantation, approximately 3.2 kilometres (km) south west of Barr in South Ayrshire. It currently comprises 32 wind turbines of up to 200 metres (m) to blade tip height with an overall capacity to produce up to 120 megawatts (MW) of generation.

**1.5** The application for the proposed Knockodhar Wind Farm is currently at early stages with a scoping opinion issued by the Scottish Government Energy Consents Unit (ECU) in February 2021 (ECU reference: ECU00002153).

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

**1.7** Therefore, to meet our license obligations, SPEN is proposing to construct a new 132kV OHL grid connection which is required to connect the proposed Knockodhar Wind

Farm into the approved extension to the existing Mark Hill collector substation in South Ayrshire.

**1.8** The Knockodhar 132kV Connection Project will be approximately 2.3 km in length and supported on wood poles. A section of underground cable will also be required for technical reasons to connect the OHL to the Mark Hill substation and will be approximately 578 m in length. The location of the existing electricity network and points of connection (substations) are shown on **Figure 1.1**. Further details of the routeing study undertaken to inform the consultation process can be found in The Knockodhar 132kV Connection Project: Routeing and Consultation Report (2021)<sup>1</sup>.

## SP Energy Networks

**1.9** SPEN owns and operates the electricity transmission and distribution networks in Southern and Central Scotland through its wholly-owned subsidiaries, SP Transmission plc (SPT) and SP Distribution plc (SPD). SPT is the holder of a transmission licence<sup>2</sup>. SPEN's transmission network is the backbone of the electricity system within its area, carrying large amounts of electricity at high voltages from generating sources such as wind farms, power stations and various other utilities across long distances to connected homes and businesses. The transmission network consists of approximately 4,000 km of overhead lines and over 600 km 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.

**1.10** 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.

**1.11** As mentioned previously, 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.

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

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

**1.13** 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.

**1.14** 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

**1.15** 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 Knockodhar 132kV Connection Project. 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 consent has been granted.

**1.16** In Scotland, the requirements for public consultation in relation to applications for OHL consent are not prescriptive. However, Scottish Ministers encourage 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).

<sup>1</sup> SP Energy Networks (2021) The Knockodhar 132kV Connection Project Routeing and Consultation Report. Available [online] at: [https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar\\_Routeing\\_and\\_Consultation\\_Report.pdf](https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar_Routeing_and_Consultation_Report.pdf)

<sup>2</sup> The references below to SPEN in the context of statutory and licence duties and the application for Section 37 consent should be read as applying to SP Transmission plc.

**1.17** 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 document<sup>3</sup>. SPEN aims to ensure effective, inclusive and meaningful engagement with the public, local communities statutory and other consultees and interested parties through four key engagement steps:

- 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 Environmental Appraisal stage.

**1.18** 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.

**1.19** Due to current COVID-19 restrictions regarding face to face interactions, the public consultation and stakeholder engagement took place online using a virtual consultation hub developed by LUC.

### Routeing and Consultation Process

**1.20** A routeing exercise was undertaken in 2021 which 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 a ‘preferred’ route for the OHL. The objective was to identify a route for the OHL which meets the technical requirements of the electricity system, which are economically viable and cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it.

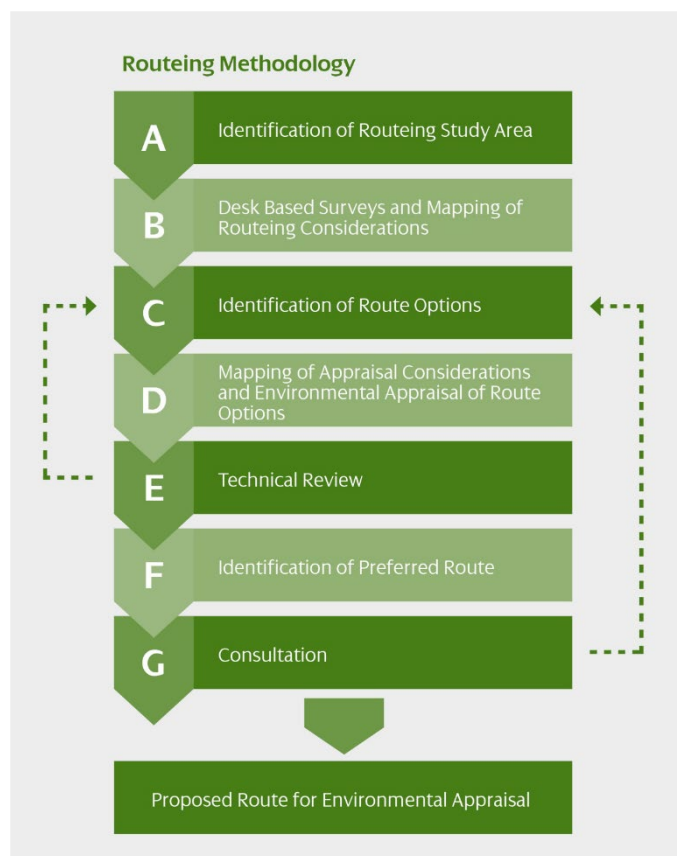
**1.21** Following established best practice for routeing OHLs, initial stages of the routeing process comprised the identification of a study area, within which environmental characteristics were mapped to inform the identification of a total of four route corridors. These route options were appraised against environmental criteria including landscape and visibility, cultural heritage and biodiversity, to identify a

preferred route for the OHL connection. Following a technical review by SPEN, the preferred route was then taken forward through the consultation process, with feedback being used to further review the routeing findings and inform the next steps.

**1.22** More information about the process followed to identify and appraise route options to select the preferred route can be found in The Knockodhar Wind Farm 132kV Grid Connection: Routeing and Consultation Report (May 2021)<sup>4</sup>.

**1.23** An overview of the broad sequential steps in SPEN’s routeing methodology are provided in **Figure 1.2** below.

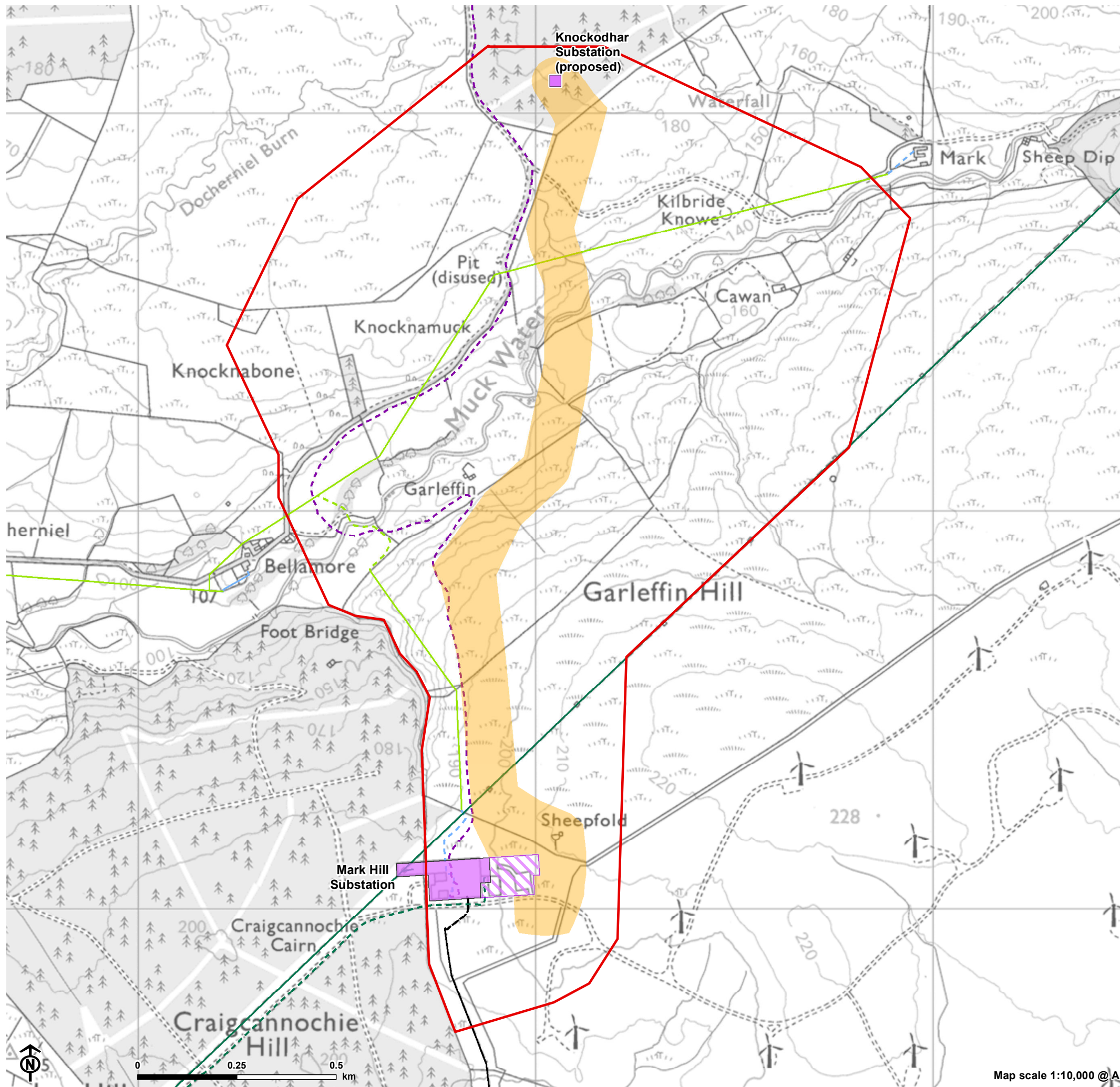
**Figure 1.2: Overview of routeing methodology**



<sup>3</sup> 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](https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Approach_to_Routeing_Document_2nd_version.pdf)

<sup>4</sup> SP Energy Networks (2021) The Knockodhar 132kV Connection Project Routeing and Consultation Report. Available [online] at: [https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar\\_Routeing\\_and\\_Consultation\\_Report.pdf](https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar_Routeing_and_Consultation_Report.pdf)

Figure 1.1: Preferred Route



- Study area
- Substation
- Consented Mark Hill Substation Extension
- 132kV Preferred Route
- 275kV OHL
- 132kV OHL
- 11kV OHL
- 230v OHL
- 275kV UGC
- 132kV UGC
- 33kV UGC
- 11kV UGC
- 230v UGC



Map scale 1:10,000 @ A3

# Chapter 2

## Consultation Process

### Overview

**2.1** SPEN attaches great importance to the effects that its work may have on the environment and on local communities. In seeking to bring forward proposals which cause, on balance, the 'least disturbance' to people and the environment, SPEN engage with key stakeholders including local communities and others who may have an interest in the project, at a number of stages as outlined in **Chapter 1**.

**2.2** Full details of the consultation that was undertaken (i.e. distribution of leaflets, advertising the public consultation, hosting an online public exhibition) are contained within the The Knockodhar Wind Farm 132kV Grid Connection: Routeing and Consultation Report (May 2021)<sup>5</sup>.

### Who SPEN Consulted

**2.3** This section describes the various groups of stakeholders relevant to the Knockodhar 132kV Connection Project that SPEN consulted during its pre-application consultation.

**2.4** All listed consultees with the exception of the Nuclear Safety Directorate (HSE), were sent information about the project by email. HSE was sent information about the project via letter. These included detail of where to find information on the Knockodhar 132kV Connection Project, including where to access the Routeing and Consultation Document and when and how to attend the online virtual exhibition, and how to make comments to SPEN. Consultees were asked for their views on:

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

**2.5** Consultees were also informed that comments at this stage are informal comments to SPEN and are made to allow SPEN to determine whether changes to the preferred route are necessary. An opportunity to comment formally to the

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<sup>5</sup> SP Energy Networks (2021) The Knockodhar 132kV Connection Project Routeing and Consultation Report. Available [online] at:

[https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar\\_Routeing\\_and\\_Consultation\\_Report.pdf](https://www.spenergynetworks.co.uk/userfiles/file/Knockodhar_Routeing_and_Consultation_Report.pdf)



Scottish Government ECU will follow at a later stage in the process following submission of the Section 37 application.

### Landowners

**2.6** Landowners with the preferred route corridor on their property were contacted directly by SPEN.

### Local Authorities and Statutory Consultees

**2.7** Statutory consultees contacted as part of the Knockodhar 132kV Connection Project are listed below:

- South Ayrshire Council (SAC – as relevant Local Planning Authority).
- Scottish Environment Protection Agency (SEPA).
- NatureScot (formally Scottish Natural Heritage (SNH)).
- Historic Environment Scotland (HES).
- Scottish Forestry.

### Community Councils

**2.8** Local Community Councils within the surrounding area of the Knockodhar 132kV Connection project were also contacted. The Community Councils contacted were:

- Barr Community Council.
- Barrhill Community Council.
- Pinwherry and Pinmore Community Council.

### Non-Statutory Consultees

**2.9** Further non-statutory consultees were sent information about the project. The non-statutory consultees contacted were:

- British Horse Society
- Crown Estate Scotland
- Defence Infrastructure Organisation (MoD)
- Fisheries Management Scotland
- Ayrshire Rivers Trust
- Local District Salmon Fisheries
- Mountaineering Scotland
- NATS Safeguarding
- Nuclear Safety Directorate (HSE)
- Royal Society for the Protection of Birds (RSPB) Scotland
- Scottish Rights of Way and Access Society (ScotWays)

- Scottish Water
- Scottish Wildlife Trust
- Scottish Badgers
- South Scotland Red Squirrel Group
- Central Scotland Bat Group
- South Strathclyde Raptor Study Group
- British Trust for Ornithology (Ayrshire and Cumbrae)
- National Farmers Union of Scotland
- The Ramblers Association
- Scottish Outdoor Access Network
- Sustrans Scotland
- The Health and Safety Executive (HSE)
- The National Trust for Scotland
- Royal Air Force (RAF)
- The Coal Authority
- West of Scotland Archaeology Service

### Local communities and members of the public

**2.10** Leaflets were distributed to local properties located within 5 km of the study area. The project leaflet invited people to attend the online virtual exhibition and gave details about how to access more information via the project website and make comments. The wider general population in South Ayrshire was informed about the consultation using an advertisement within the Ayr Advertiser, a weekly local newspaper, as described above.

# 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 Report. In total there were 763 visits to the online virtual exhibition, with a total of nine representations received from the public through the different response mechanisms previously outlined. Feedback has also been received from landowners and consultees who SPEN are continuing to work with to refine the preferred route option during the detailed design stage.

### Stakeholder Responses

**3.2** A total of four stakeholders made representations during the pre-application consultation. These were:

- South Ayrshire Council (SAC);
- Historic Environment Scotland (HES);
- NatureScot; and
- The Crown Estate Scotland.

**3.3** SAC advised that they were unable to comment at this stage and will respond during the formal consultation stage in accordance with normal procedures.

**3.4** SPEN are continuing to liaise with the landowners directly and landowner responses are being dealt with separately via the design process.

**3.5** A full list summarising the consultation responses received and the responses made by SPEN (including any actions required through the design process) are outlined in **Appendix A: Summary of Pre-Application Consultation Feedback from Routeing Stage**.

### Ongoing Consideration of Feedback

**3.6** SPEN will continue to consider the local information consultees and local people provided in their feedback to inform the Knockodhar 132kV Connection Project's development and will keep communities, including landowners, up to date (via the project website) as its proposals move forward and there will also be further opportunities for people to provide feedback during future consultation following the submission of the Section 37 application to the ECU.

### Key Feedback Themes

**3.7** Key feedback themes identified through the pre-application consultation process included:

- Comments on the visibility of the OHL and effects on landscape and visual amenity.
- The rationale underpinning construction of an OHL as opposed to an underground cable and the requirement for an OHL where Knockodhar Wind Farm has not yet been granted permission.
- Concerns raised regarding previous construction works in the area and the resulting impacts upon the condition of the existing tracks and roads in the locality and impacts upon existing telecommunication links within the area.
- Comments on the effects of the preferred route option and other route options on residential properties and land use.
- Comments on information included within the Routeing and Consultation Report and the routeing process.

## Chapter 4

# Conclusions and Next Steps

**4.1** SPEN has reviewed and considered in detail all feedback received from the public, consultee bodies and landowners in relation to the pre-application consultation for the Knockodhar 132kV Connection Project.

**4.2** The feedback received has informed SPEN's review of the Knockodhar 132kV Connection Project with regard to the following:

- Views on the project as a whole, including the routeing methodology and consultation process;
- Views on SPEN's route options; and
- Information about the local area, for example, local environmental characteristics and updated property information.

### Confirmation of the Preferred Route

**4.3** Following the findings of the routeing study and consideration of the feedback received during the pre-application consultation, Route Option 3 has been confirmed as the proposed route option for the Knockodhar 132kV Connection Project, as seen on **Figure 1.1**.

### Next Steps

**4.4** The proposed Route Option 3 will be progressed to identify an OHL alignment, including pole positioning, which will be informed by the Environmental Appraisal<sup>6</sup> detailed engineering ground surveys and discussions with landowners. The alignment, including all ancillary development, will be included in the application for Section 37 consent and deemed planning permission. Information collated from feedback received as part of the pre-application consultation relating to locally important areas and features will be reflected in the design of the alignment alongside the field surveys where relevant.

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

**4.6** The Knockodhar 132kV Connection Project will require consent under Section 37 of the Electricity Act 1989. A

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<sup>6</sup> Subject to the Scottish Ministers confirming the Project does not require an EIA.

Screening Request will be submitted to the Scottish Government Energy Consents Unit for the Knockodhar 132kV Connection Project to request a formal Environmental Impact Assessment (EIA) Screening Opinion from the Scottish Ministers in accordance with Regulation 8(1) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. If it is determined that an EIA is not required to accompany the application for Section 37 consent, the application will be accompanied by an Environmental Appraisal Report.

**4.7** Following the submission of the Section 37 application, further public consultation will be carried out by the Scottish Government ECU.

## **Appendix A**

### **Summary of Consultation Feedback from Routeing Stage**

Appendix A  
Summary of Consultation Feedback from Routeing Stage

The Knockodhar 132kV Connection Project  
October 2021

Table A.1: Summary of consultation feedback from statutory consultees

Consultee	Summary of Feedback	Response / Comments
South Ayrshire Council (SAC)	<p>Response received: 25<sup>th</sup> May 2021</p> <p>SAC is unable to comment at this stage. SAC will respond during the formal consultation stage in accordance with normal procedures.</p>	<p>LUC confirmed receipt of the email from SAC on 25<sup>th</sup> May 2021 and noted that comments would be reserved for the formal consultation following submission of the application to the ECU.</p>
Historic Environment Scotland (HES)	<p>Response received: 14<sup>th</sup> June 2021</p> <p>HES recommended SPEN contact South Ayrshire Council's archaeological advisors, the West of Scotland Archaeology Service (WoSAS), for advice on potential impacts on historic environment assets outwith HES' statutory remit.</p> <p>There are no designated assets within HES' remit within the preferred Route Option 3 or any of the alternative route options. HES is therefore, content that all route options will not have direct impacts on any assets within HES' specific remit.</p> <p>Given the distances to the closest designated assets within HES' remit and the small scale of the OHL being proposed, HES finds the preferred Route Option 3 and all alternative route options are also unlikely to have significant impacts on the setting of any designated assets in the wider surrounding area of the proposed development.</p>	<p>With regard to contacting WoSAS, LUC can confirm that WoSAS were consulted via email on 18<sup>th</sup> May 2021 and 2<sup>nd</sup> September 2021. No comments have been received from WoSAS in response to this consultation.</p> <p>SPEN note that there are no assets within HES' remit that would likely be impacted by the preferred OHL Route Option 3.</p>
NatureScot	<p>Response Received: 21<sup>st</sup> June 2021</p> <p>NatureScot welcomes the work done to minimise negative impacts associated with the OHL on landscape and biodiversity receptors and agree that all of the important natural heritage constraints have been taken into account. NatureScot concurs with the conclusions set out within the Routeing and Consultation Report.</p> <p>NatureScot acknowledges the work carried out to minimise impacts on Class 1 and 2 priority peatland habitat and advise that careful micro-siting and mitigation should be employed to minimise impacts on Class 3-5 soils which are classed as carbon-rich soils and deep peats. NatureScot advise that work is carried out to clarify habitat types and peat depths within the search area to further refine the siting of any required infrastructure.</p> <p>NatureScot advises the impacts on the Lower Pastoral Valley and Upper Valley and Plateau Moorland Fringes LCT are assessed through use of appropriately scaled ZTV and representative skyline and viewpoint visualisations to help establish effects on landscape character, visual amenity and local landscape value.</p>	<p>Further detailed survey work is underway in relation to ecology/ornithology, and landscape in the area to further feed into the detailed design of the OHL route.</p> <p>Great Crested Newt surveys have been undertaken and no evidence of the species was found.</p> <p>A peat depth survey and watercourse survey has been undertaken for the Route Option 3 corridor and will be used to inform the siting of infrastructure to minimise impacts on Class 5 soils and watercourses. There are no Class 1 or Class 2 priority peatland habitats within the Route Option 3.</p> <p>The environmental appraisal work will consider the impacts noted by NatureScot in the review of the impacts of the OHL proposal.</p>

Appendix A  
 Summary of Consultation Feedback from Routeing Stage

The Knockodhar 132kV Connection Project  
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Consultee	Summary of Feedback	Response / Comments
	<p>NatureScot advises there are no statutory designated sites that will be directly or indirectly affected by the proposal.</p> <p>NatureScot advises the key natural heritage issues to be considered as part of the routeing process are:</p> <ul style="list-style-type: none"> <li>■ The locally designated site of Muck Water (and in combination with the proposed Clauchrie 132kV OHL Project);</li> <li>■ Impacts on watercourses and associated species;</li> <li>■ Impacts on any protected species; and</li> <li>■ Recreation and access impacts.</li> </ul> <p>NatureScot advise that future environmental assessment should evaluate the cumulative impacts of the Knockodhar and Clauchrie grid connections and the relevant impacts of the associated wind farms.</p> <p>NatureScot advise that impacts arising from the construction access, and materials storage, aspects of the OHL build are fully integrated into any future environmental appraisal of the Clauchrie 132kV Connection Project.</p>	



Appendix A  
 Summary of Consultation Feedback from Routeing Stage

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Table A.2: Summary of consultation feedback from non-statutory consultees

Consultee	Summary of Feedback	Response / Comments
The Crown Estate Scotland	Response received: 11 <sup>th</sup> June 2021 The Crown Estate Scotland requested GIS shapefiles for the preferred route to ascertain any impacts on Crown Estate Scotland interests.	GIS shapefiles for the preferred route (Route Option 3) were emailed by LUC on 15 <sup>th</sup> June 2021 to the Crown Estate Scotland.
	Response received: 25 <sup>th</sup> June 2021 The Crown Estate Scotland sought clarification regarding the status of the proposal in relation to the neighbouring wind farms.	Clarity was provided via email by LUC on 25 <sup>th</sup> June 2021 to confirm that the grid connection projects were being progressed by SPEN separately from the nearby wind farm applications.
	Response received: 12 <sup>th</sup> July 2021 Savills contacted LUC to confirm that they were reviewing the proposals on behalf of the Crown Estate Fishery interests.	No formal comments received from Savills at the time of writing. After several attempts to obtain further comments from Savills, we have been unsuccessful and have no further detail in this regard.

Table A.3: Summary of consultation feedback from public representation

Key Themes / Topics	Issue Raised	Response / Comments
<p>Landscape and Visual</p>	<p>Concern is expressed over the visibility of the proposed OHL, notably from residential properties and in combination with existing OHLs in the landscape.</p> <p>Respondents questioned why the existing underground Tralorg cable is not being utilised to connect the Knockodhar Wind Farm to the Mark Hill substation.</p> <p>Some respondents advised they would remove their objection if the Knockodhar 132kV Connection Project was undergrounded.</p> <p>One respondent strongly objected to the proposal due to detrimental effects on the visual aspects of the Muck Water area. The respondent comments that this part of Carrick has already reached saturation point with the number of wind turbines currently in the area and an additional OHL would exacerbate the industrialisation of the landscape within this scenic area. The respondent comments this area was designated by UNESCO as the 'buffer zone' of the Galloway and South Ayrshire Biosphere and should such power lines eventually be unavoidable, the cables should be placed underground.</p>	<p>With regards to landscape and visual amenity, the appraisal of the route options has been informed by both desk-based studies and field work undertaken by qualified Landscape Architects at LUC and in accordance with accepted approaches to the analysis of this subject.</p> <p>Cumulative impacts with the existing 275kV OHL and the proposed Clauchrie 132kV OHL have also been considered in combination with the emerging preferred Route Option 3. It is likely that cumulative interactions with the proposed Clauchrie 132kV Connection Project will be localised in the area where both OHLs will link into the Mark Hill Substation extension to the south of the study area. The emerging preferred route would also require crossing the existing 11kV OHL at some point north of Muck Water. The emerging preferred route would also run parallel to a further short section of 11kV OHL, which runs north of Mark Hill Substation.</p> <p>With regards to the query on connecting into existing underground line, the Tralorg wind farm connection operates at a lower voltage (33kV) than the proposed connection for this wind farm (132kV), which prevents consolidation of these connections on technical grounds. Separate connections are required in this context.</p> <p>SPEN do look to consolidate connections where possible but this requires a number of factors to align, including the technical voltage aspects mentioned and similar contracted connection dates.</p> <p>As a regulated business, Scottish Power Transmission (SPT) are required by the Electricity Act 1989 to develop and maintain a technically feasible and economically viable transmission and distribution system. In practice this will typically mean an OHL solution will be sought in the first instance rather than underground cable, due to the difference in cost. OFGEM act as the government regulator and require project costs to be justified prior to acceptance of a project.</p>

Appendix A  
Summary of Consultation Feedback from Routeing Stage

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Key Themes / Topics	Issue Raised	Response / Comments
Tracks / Roads	<p>Concern is expressed over the condition of the existing tracks/roads (with specific mention of Muck Road and the bridge over Muck Water) due to damage caused by previous works in the area.</p> <p>Following the installation of the Tralorg cable, respondents advised the tracks/roads were left in a state of disrepair. This continues to cause disruption to users of the road. Respondents have been advised by the SAC Roads department that they are pursuing this with SPEN.</p>	<p>SPEN are (at the time of writing) in contact with local residents and the local authority with a view to resolving the concerns around the condition of the affected road and wall. At present it is not possible for SPEN to confirm when the matter will be resolved but it is something that is actively being discussed with a view to addressing.</p> <p>SPEN will continue to liaise with local residents and the local authority on this issue, however no actions are required in relation to the preferred route alignment.</p>
Telecommunication Links	<p>Concern expressed regarding potential damage to the telephone cable from Pinwherry Telephone Exchange to properties within the forested area, the last property being Ferter Farmhouse. Mobile phone signals are reported to be unreliable in this area. Therefore, any damage to the approximately 14 mile long cable would cause adverse effects to local residents. A request is made for a contact number/email address be given to all residents, so that any damages can be reported immediately.</p>	<p>Concerns regarding the potential damage to telecommunication links are noted.</p> <p>SPEN responded directly to this respondent on 24<sup>th</sup> August 2021 stating, subject to consent being granted, contact details can be provided to allow residents to voice any concerns to the relevant SPEN personnel, likely the construction manager or community liaison representative. The Community Liaison details are 07516 461129 or email <a href="mailto:majorprojects@spenergynetworks.com">majorprojects@spenergynetworks.com</a>.</p>
Route Options	<p>Respondents found Route Options 3 and 4 most preferable. One respondent noted that Route Options 3 and 4 have a lesser chance of impacting a grazing let for cattle within the fields marked Knocknamuck and Knocknabone. By comparison, Route Options 1 and 2 would traverse through this rented ground.</p> <p>Another respondent noted Route Options 1 and 2 are located in closer proximity to their residential property and would object to Route Option 1 as this would have a significant impact on the residencies outlook.</p> <p>Some respondents commented they would prefer the connection to be underground.</p> <p>Another respondent commented the preferred route would be to use the underground Tralorg cable. The same respondent notes the existing Tralorg line runs in close proximity to the proposed Knockodhar wind farm site and the substation and comments that utilisation of this existing line would also tie in with factors assessed when considering a route option, such as limiting the effect on the environment and landscape and visual effects.</p>	<p>Comments received regarding the preference of route options are noted. It is noted that whilst undergrounding the cable would be the first preference, there is some agreement that the preferred route (Route Option 3) is likely to have least environmental impact.</p> <p>With regards to FLS management plans, SPEN have been in consultation with FLS as the landowner of land within the study area and will be liaising with them throughout the alignment and environmental appraisal process. Survey work regarding forestry is also instructed to inform the process moving forward.</p> <p>With regards to information not presented on the project leaflets that were distributed, the purpose of these leaflets was to introduce the projects at a high level with the view to encouraging the public to access the online information (where more detail was available) or to contact the project team directly if they wanted information/had any queries.</p> <p>With regards to the existing underground cable, as previously mentioned under the 'Landscape and Visual' section above, the Tralorg</p>

Appendix A  
Summary of Consultation Feedback from Routeing Stage

The Knockodhar 132kV Connection Project  
October 2021

Key Themes / Topics	Issue Raised	Response / Comments
	<p>The same respondent also comments that current land use is due to change soon on the routeing options with Forestry and Land Scotland (FLS) implementing a land management plan involving planting a large area of the land. The respondent notes this is also not mentioned or considered in the consultation leaflet.</p> <p>The same respondent queries why the Tralorg route was not shown on the leaflet but is shown in the online virtual exhibition.</p>	<p>wind farm connection operates at a lower voltage (33kV) than the proposed connection for this wind farm (132kV), which prevents consolidation of these connections on technical grounds. Separate connections are required in this context.</p> <p>The project team is also aware of the intention to plant trees in this area and is in correspondence with FLS as a landowner.</p>
Incorrect Information	Paragraph 4.8 of the Routeing and Consultation Report refers to Bellamore Farm as being uninhabited. This is incorrect.	<p>The updated position regarding the Bellamore property is welcomed.</p> <p>The property sits on the western extent of the study area and has been considered in the appraisal of the route options undertaken to date. The updated information regarding the habitation of Bellamore will be taken through the alignment and environmental appraisal stages.</p>
Additional Information	Information requested on the number of Trident double 'H' poles.	SPEN provided a direct response to this query on 17 <sup>th</sup> May 2021 and a further clarification on 18 <sup>th</sup> May 2021. It was confirmed that there are expected to be between 21 to 26 H poles for the Knockodhar wind farm connection to Mark Hill substation. This is on the basis of the line being approximately 2.09 km long including a 500 m section of underground cable and with OHL spans between poles of 80 m – 100 m. <sup>7</sup>
Survey Information	It is suggested that field work should be undertaken rather than desk top studies.	A combination of desk-based studies and field work have informed the route analysis to date, with further more detailed field surveys relating to ecology and ornithology, hydrology, geology and peat, and forestry are being undertaken to inform the route alignment and environmental appraisal stages.
General	<p>One respondent purely commented that they strongly object to the project.</p> <p>One respondent advises that the proposals will have a great impact on the local area.</p> <p>One respondent expressed that they do not want further energy developments in this area and are tired of being bullied by the Scottish Government and SPEN.</p>	<p>Comments are noted. The impacts of the proposals upon the area will be fully assessed through the environmental appraisal process.</p> <p>Due to the timelines involved in the delivery of OHL projects it is often the case that the connection is sought in parallel with applications for the connecting wind farm. Should approval not be granted for the wind farm then the connection would not be built.</p>

<sup>7</sup> Response correct at time of writing. The final configuration of the route will be determined through the design process.

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	<p>One respondent questioned why this application is being submitted given that approval has not been given for the Knockodhar Wind Farm.</p>	<p>SPEN via SP Transmission are required by license obligations set out in the Electricity Act 1989 and regulated by Ofgem to develop and maintain an efficient, co-ordinated and economical system of electricity transmission/ distribution. In practice this means SPEN has a legal duty to seek connections for generators such as wind farms following a formal connection request. Whilst it is appreciated that some locations will experience a greater concentration of proposed connections than others, this is mainly as a result of geographical factors given the locations of wind farms and transmission substations on the network. Consideration of the impact on people who live, work and recreate close to proposed connections does form part of the balanced decision-making process when routeing a new connection. The pre-submission public consultation work undertaken by SPEN is aimed at understanding local opinion and further formal consultation is also possible once an application has been submitted for a decision to the Scottish Government. If the rationale described here is not sufficient to explain why SPEN operates in the way in which it does we would invite further dialogue via the SPEN Community Liaison contacts – Colin Wylie and Amar Shakoor, who can be contacted on telephone number 07516 461129 or by email at <a href="mailto:majorprojects@spenergynetworks.com">majorprojects@spenergynetworks.com</a>.</p>