

## APPENDIX 1: STATUTORY AND NON-STATUTORY CONSULTATION RESPONSES RECEIVED AT ROUTEING STAGE

Stakeholder	Summary of Feedback	Response by SSEN Transmission
<b>Statutory</b>		
Historic Environment Scotland (HES)	<p>A number of nationally important designated assets are both within the preferred route and its vicinity. These may potentially receive either direct impacts or impacts to their setting from the proposed OHL. HES recommend that potential impacts from the project to these assets are assessed and appropriate mitigation is implemented to avoid any significant impacts.</p> <p>At this stage and from the information provided so far, HES consider that it may be possible to accommodate an OHL of this scale within the preferred route, with appropriate mitigation in the form of careful design.</p> <p>HES will welcome further consultation on the OHL design to ensure that significant effects are avoided.</p> <p>The alternative route options would in some cases incorporate greater numbers of Category A listed buildings within and in proximity to the route options. Should any of these options be further considered these assets should be considered for potential direct impacts and impacts to their settings.</p>	<p>These comments are noted. Further work to consider potential impacts on the historic environment will continue throughout the alignment stage of the project, so as to mitigate adverse effects on designated assets where possible. Ongoing consultation with HES will be maintained.</p>
SEPA	<p>SEPA have no specific overall preference of route option, but where applicable have provided advice on route preferences in regard to specific issues. These are detailed below.</p> <p>SEPA also note that consideration of potential environment effects is undertaken in line with appropriate guidance and relevant information is provided prior to an application being submitted in relation to engineering activities in accordance with standard SEPA requirements.</p>	<p>Comments are noted and responses provided below. Dialogue with SEPA will be maintained throughout the project.</p> <p>Reference will be made where appropriate to SEPA guidance documents prior to an application being submitted.</p>
	<p>Areas where deep peat and GWDTEs are present should be avoided. If this is not possible and justification has been provided, appropriate mitigation measures should be put in place to protect these habitats.</p>	<p>Further environmental and engineering studies will be undertaken at the alignment stage to minimise potential effects on deep peat and GWDTEs where practicable, and inform appropriate mitigation measures.</p>
	<p>Routes A, B or C have the least potential 'importance 1' peat disturbance, and as such are preferred from a peat perspective. Depending on alignment, Route A1 could also be acceptable.</p>	<p>Areas of deeper peat will be avoided as far as practicable.</p>

	Peat probing should be used to inform the alignment and more detailed drawings provided showing the results of this with the infrastructure overlain.	
	Rothes has a long history of flooding from a combination of the Back Burn, the Burn of Rothes and the Black Burn. To mitigate against this flooding, Moray Council completed the Rothes Flood Alleviation Scheme (FAS) in 2011, to provide a standard of protection of 1 in 100 years plus an allowance for climate change. SEPA would therefore request that it is demonstrated that any works associated with this development has no impact on the present flow regime of these burns and the level of protection provided by the Rothes FAS.	This comment is noted and potential impacts on the flow regimes of these burns will be considered during the alignment stage of the project.
	The preferred route (A1) crosses the River Spey at Boat of Brig. SEPA operate a hydrology station on the River Spey at this location and it must be demonstrated that there will be no impact on its operation, resulting from this development.	The location of this hydrology station is noted and will be given due consideration during the alignment stage.
	Close to Keith the preferred route (A1) crosses the River Isla. Keith has experienced flooding in the past and therefore it must be demonstrated that no works associated with this development will increase the flood risk downstream in the town.	Flood risk will be considered during the alignment stage of the project.
	Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands.	This comment is noted.
NatureScot (formerly Scottish Natural Heritage (SNH))	<p>The preferred route crosses the River Spey and a large portion of the route is within the river's catchment with potential to impact on tributaries and wetlands linked to the river system. The River Spey is a SSSI and a SAC. The tributaries, the Burn of Rothes, Back Burn, Broad Burn and Burn of Mulben, are partially included within the boundary of the SAC.</p> <p>In most cases it should be possible, with considerate planning and mitigation, to avoid impacting on the watercourses and wetlands linked to the Spey and therefore avoiding harm or damage to the qualifying features of the SAC / SSSI. It is likely that a suite of best practice and pollution prevention measures would be sufficient to offer enough protection but there may be locations along the route where the soil conditions or slope stability add an increased risk of erosion that may require specific measures to manage that risk.</p> <p>The catchment of the Burn of Rothes and the Mulben Burn have been prone to erosion and landslips previously. With advice from experts SHE Transmission</p>	<p>Comments are acknowledged. Further environmental and engineering studies will be undertaken at the alignment stage to find an acceptable alignment across the River Spey catchment, and identify appropriate mitigation measures to minimise potential impacts.</p> <p>Dialogue with SNH will be maintained through this process.</p>

	<p>may find the alignment should focus on areas of more gentle slopes and stable soils.</p>	
	<p>The preferred route comes into contact with the Speyside Way long distance route (LDR) at Boat O'Brig. Visibility maybe somewhat limited on the valley floor but the LDR rises up both sides of the Mulben valley so views of the new OHL are likely. There are also existing OHLs that follow a similar route so 'clutter' may be an issue here given landscape constraints.</p>	<p>This comment is acknowledged. Potential impacts on landscape and visual receptors will seek to be minimised at the alignment stage, where practicable.</p>
	<p>The preferred route only includes one small section of ancient woodland of semi-natural origin as recorded on the Ancient Woodland Inventory. Other sections of long-establish woodland (of plantation origin) are also traversed by the route. The alignment will determine the impact the project will have on woodland and the Scottish Government's Control of Woodland Removal Policy will apply where woodland will be lost to accommodate the route, wayleave and any associated access and compounds etc.</p> <p>Anticipating that it will not be possible to avoid all woodland, some compensatory planting will be necessary and from SNH's perspective there is an opportunity here during future public consultation to seek the communities' views on what type of planting and where could offer enhanced benefits.</p>	<p>This comment is acknowledged. Potential impacts on woodland and commercial forestry will seek to be minimised at the alignment stage, where practicable, and opportunities for compensatory planting will be reviewed.</p>
	<p>The route crosses Hunt Hill, an area of heathland, where black grouse and some upland wader species have been recorded recently. Hunt Hill also has an approved woodland creation scheme across it. There may be recent survey data available that might help inform alignment (e.g. from RSPB).</p>	<p>This comment is acknowledged and recent survey data will be sought to inform the alignment.</p>
<b>Non-Statutory</b>		
<p>Scottish Forestry (SF)</p>	<p>The Scottish Government's Control of Woodland Removal Policy (CoWRP) includes a strong presumption in favour of protecting Scotland's woodland resources. SHE Transmission should demonstrate that any woodland removal is necessary and unavoidable. This should be allowed only where it would achieve significant and clearly defined additional public benefits, and compensatory planting proposals designed to mitigate impact of any proposal should form part of the development proposals and comply with the UK Forestry Standard.</p> <p>The preferred route overlaps many woodlands that would have this level of protection through the policy. Hopefully the selected route is wide enough to avoid these areas, however there is a definite pinch point from the Boat o' brig</p>	<p>This comment is acknowledged. Potential impacts on woodland and commercial forestry will seek to be minimised at the alignment stage, where practicable. If required, compensatory planting proposals would be developed.</p>

	east to Mulben, where a high proportion of the route consists of woodlands that would have a strong presumption against removal.	
Scottish Water	Scottish Water has no objection to this planning application.	This comment is acknowledged.
	The development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets. The proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Further assessment of risks and consultation with Scottish Water required to determine potential impacts on these assets / catchments, and appropriate mitigation.	Further environmental and engineering studies will be undertaken at the alignment stage as appropriate to seek to find an acceptable alignment that minimises potential impacts on the water environment and Scottish Water assets. Reference will be made to Scottish Water guidance documents as appropriate. Dialogue with Scottish Water will be maintained through this process.
Speyside Community Council	An in-person consultation process would have been preferable. Issues were raised with the readability of the booklet and with accessibility of the virtual consultation. Concerns were raised about the ability of individuals to participate in the consultation due to broadband capacity or access to appropriate technology, further compounded by the current COVID-19 restrictions.	This comment is acknowledged. Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the Covid-19 pandemic these events could not be held. SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time.
	Questions were also raised about the potential to use an underground cable and potential associated costs, monetary, environmentally and visually.	Undergrounding the entire circuit has been discounted for a number of reasons. The main reason is for the maintenance of the line in the future. In the event of a fault on the line, the fault can be detected and rectified in a matter of days. Whereas a fault in an underground cable could potentially take months to fix.  Furthermore the footprint required to install the cables (a 6m wide and 1.5m deep trench along the route) would increase the potential to damage the local environment during construction. From a cost perspective and as a rough guide for a 132kV circuit based on a kilometre of transmission overhead line (dependant on the price of metal) typical cost difference would be between 4 and 8 times more expensive for a cable.

	<p>Questions were raised about whether landowners would be compensated.</p>	<p>The project land manager would discuss the wayleaves process with any affected land owners should the selected alignment cross over their land.</p>
	<p>Questions were raised about the wind farm location due to confusion around the naming of the project.</p>	<p>The proposed Rothes III wind farm is in the vicinity of the hill of Carn na Calliche, approximately 4 km west of Rothes in Moray. It is located to the east of the existing Rothes I and II wind farms.</p> <p>This transmission connection will be known as the Elchies Windfarm Connection. There will also likely be a connection to the distribution network at a different point and this will be known as the Rothes III Windfarm Connection. The Rothes III Windfarm Connection will not be considered further at this consultation and will be consulted on separately where appropriate.</p>
	<p>Looking forward to being consulted on the Preferred Alignment, preferably through an in-person process.</p>	<p>SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time.</p>