

Report on Consultation – Alignment Options
Elchies (Rothes III) Wind Farm Connection
November 2022

REF: LT122



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GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Alignment (preferred)	An alignment for the overhead line taken forward to stakeholder consultation following a comparative appraisal of alignment options.
Alignment (proposed)	An alignment taken forward to consenting stage. It comprises a defined centre line for the overhead line and includes an indicative support structure (tower or pole) schedule, also specifying access arrangements and any associated construction facilities.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SSEN Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Biodiversity Net Gain (BNG)	A process intended to leave nature in a better state than it started using good practice principles established by the Business and Biodiversity Offset Programme (BBOP) and organisations including CIRIA, CIEEM and IEMA.
Conductor	A metallic wire strung from structure to structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between the defined connection points. The Corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Environmental Appraisal (EA)	<p>When a Proposed Development is unlikely to give rise to significant environmental effects and is not considered an EIA development it would not be subject to an EIA and the preparation of an EIA Report. In this circumstance, an optional Environmental Appraisal (EA) detailing the results of surveys, and any appropriate mitigation, can accompany a planning application.</p> <p>The results of the EA would be submitted to the Energy Consents Unit, Moray Council and Statutory Consultees.</p>
Environmental Impact Assessment (EIA)	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA process is set out in Regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Kilovolt (kV)	One thousand volts.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.

Term	Definition
Ordnance Datum (OD)	Ordnance Datum or OD is a vertical datum used by an ordnance survey as the basis for deriving bathymetric levels on charts. A spot height may be expressed as AOD for "above ordnance datum" or BOD for "below ordnance datum".
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition.
Sites of Special Scientific Interest (SSSI)	Areas of national importance. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by Moray Council which are considered to be of regional/local importance for their scenic qualities.
Stakeholders	Organisations and individuals who can affect or are affected by SSEN Transmission works.
Study Area	The area within which the Corridor, route and alignment study takes place.
The National Grid	The electricity transmission network in the Great Britain.
Underground Cable (UGC)	An electric cable installed below ground, protected by insulating layers and marked closer to the surface to prevent accidental damage through later earthworks.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner upon whose land an overhead line is to be constructed and SSEN Transmission.

PREFACE

This Report on Consultation has been prepared by ASH design+assessment Limited on behalf of Scottish and Southern Electricity Networks Transmission (herein referred to as 'SSEN Transmission'), operating under licence as Scottish Hydro Electric Transmission plc. The document has been prepared to provide a summary of the responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) during consultation between September and October 2021 in response to the Preferred Alignment identified for the new 132 kV connection between Rothes III Wind Farm on-site substation and Blackhillock substation near Keith.¹ Subsequent action taken by SSEN Transmission to address the responses received from key stakeholders has also been described in this Report. Primarily this action consisted of the generation and appraisal of additional alignment variants between September 2021 and November 2022.² This Report then outlines and justifies the Proposed Alignment that will be taken forwards to EIA / EA consenting stage.

Given the easing of COVID-19 restrictions in September 2021, in-person consultation events took place for this project. The in-person consultation events took place at the following times:

- 28th September 2021; 14:00-19:00
- 29th September 2021; 14:00-19:00

However, to ensure wider access and engagement virtual consultation events were also still held.

SSEN Transmission developed an online consultation tool, to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, interactive videos and the opportunity to share views on the proposals.

Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current alignment options.

The virtual consultation events took place via the project website <https://www.ssen-transmission.co.uk/projects/elchies-rothes-iii-wind-farm-grid-connection/> at the following times:

- 30th September 2021; 13:00-15.00 and 17:00-19:00

¹ SSEN Transmission (September 2021): Consultation Document: Alignment Options - Elchies (Rothes III) Wind Farm Grid Connection

² SSEN Transmission (November 2022): Alignment Selection Study Report - Elchies (Rothes III) Wind Farm Grid Connection

EXECUTIVE SUMMARY

The proposed Rothes III wind farm (capacity 99 MW) in Moray requires connection to the electricity transmission network at Blackhillock substation by June 2025. It is anticipated that this will be achieved via the construction and operation of a new 132 kV single circuit Overhead Line (OHL) routed between the proposed Rothes III Wind Farm onsite substation and Blackhillock substation. It is anticipated that the connections into Rothes III on-site substation (approximately 500 m in length) and Blackhillock substation (approximately 1 km in length) would be by underground cable (UGC). The UGC connection into Rothes III on-site substation was not included in the Consultation Document. It arose from ongoing assessment works.

The programme of consultation was designed to engage with key stakeholders in order to invite feedback on the rationale for, and approach to, the selection of the Preferred Alignment.

This Report describes the key responses received and provides detail on the actions proposed in response to the issues raised in the September 2021 Consultation Document. The main actions taken in response to the issues raised was the introduction and appraisal of a series of new alignment variants. From these a Proposed Alignment was established which will be taken forward as the project progresses through to the EIA / EA and Consenting Stage and will be the subject of further study.

1. INTRODUCTION

1.1 Background and Purpose of Document

- 1.1.1 SSEN Transmission is proposing to construct a new 132 kV single circuit overhead line (OHL) connection between Rothes III Wind Farm on-site substation and Blackhillock substation near Keith. The project is known as the Elchies (Rothes III) Wind Farm Grid Connection.
- 1.1.2 The majority of the connection would be supported on a trident wood pole. This is the most economical option which minimises access requirements and environmental impacts during construction due to reduced foundation and access requirements. While SSEN Transmission has determined that a trident wood pole is the preferred technological solution for this project, it is recognised that there may be potential environmental and technical considerations that require the use of alternative technology options for short lengths of the preferred alignment. UGC is anticipated to be utilised on final approach to Rothes III on-site substation and Blackhillock substation.
- 1.1.3 This Report on Consultation documents the consultation process for the project. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Alignment.³ The alignment variants being commented on were situated within the Preferred Route for the connection, as identified in 2020. In accordance with SSEN Transmission's guidance,⁴ a process of consultation on the Preferred Route had previously been undertaken (June 2020 and August 2020).
- 1.1.4 This Report describes the key responses received and details the actions taken in response to the issues raised in the alignment consultation process. As a result of the alignment stage consultation feedback, further alignment variants were developed to address landowner consultee concerns. These were appraised between September 2021 and November 2022. This led to the selection of a Proposed Alignment.⁵

1.2 Objectives

- 1.2.1 The objectives of this report are:
- To document the consultation process between September and October 2021;
 - To summarise feedback received from stakeholders following the consultation events;
 - To document actions undertaken in response to feedback where relevant; and
 - To clearly set out how the Proposed Alignment has been informed by the consultation process.

1.3 Document Structure

- 1.3.1 This Report on Consultation is structured as follows:
- Section 1: Introduction - setting out the purpose of the Report on Consultation;
 - Section 2: Project Overview – outlines the background to the project and provides a description of the key elements;
 - Section 3: Consideration of Alignment Options – describes how the Preferred Alignment presented at alignment stage consultation in September 2021 was identified and describes how further alignment variants were generated post alignment stage consultation;

³ Identified within the Elchies (Rothes III) Wind Farm Grid Connection, Alignment Consultation Document (September 2021), produced by SSEN Transmission.

⁴ SSEN (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above

⁵ Identified within the Elchies (Rothes III) Wind Farm Grid Connection, Alignment Selection Study Report (November 2022), produced by SSEN Transmission

- Section 4: The Consultation Process – describes the framework for consultation and methods which have been employed;
- Section 5: Consultation Responses from Statutory and Non-Statutory Consultees - summarises the responses from these bodies;
- Section 6: Community and Landowner Responses – summarises the responses and key comments from members of the public and landowners;
- Section 7: Project Responses to Consultation – describes how the comments and issues raised during consultation will be addressed as the project progresses; and
- Section 8: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

2. PROJECT OVERVIEW

2.1 The Need for the Project

2.1.1 The proposed Rothes III Wind Farm (capacity 99 MW) in Moray requires connection to the electricity transmission network Blackhillock substation by June 2025. It is anticipated that this would be achieved via the construction and operation of a new 132 kV single circuit Overhead Line (OHL). It is anticipated that the connections into Rothes III on-site substation (approximately 500 m in length) and Blackhillock substation (approximately 1 km in length) will be via underground cable (UGC). These will fall under SSEN Transmission's permitted development rights as statutory undertaker. This connection will be known as the Elchies (Rothes III) Wind Farm Connection. A separate connection will also be made from the Rothes III Wind Farm into the National Grid and this will be known as the Rothes III Wind Farm Connection. SSEN Transmission is not responsible for this connection to the distribution network and therefore it is not considered further in this report.

2.2 Alternative Technology Options Considered

2.2.1 While SSEN Transmission has determined that a trident wood pole is the preferred technological solution for this project, it is recognised that there may be potential environmental and technical considerations that require the use of alternative technology options for short lengths of the alignment. Until a Proposed Alignment for the OHL has been identified and detailed assessments and consultations have been completed, the requirement or extent of any use of other technology options is not known. However, as stated above it is understood that technical requirements dictate that the departure from Rothes III Wind Farm on-site substation and the approach to Blackhillock substation will need to be UGC. Further details are provided below.

2.3 Proposals Overview

2.3.1 The trident wood poles would vary between 10 – 18m depending on the span length required. However, the average height of the structures across the line will be 14m (including insulators and support). The proposed trident wood pole would support three conductors (wires) in a horizontal flat formation. The spacing between poles would vary depending on topography and altitude. The specific distances would be determined after a detailed line survey but would be approximately 100 m apart. A photograph showing a typical wood pole trident line is shown in Plate 2.1 below. Two sections of UGC are anticipated, one at the western end of the connection for approximately 500 m as it would leave Rothes III Wind Farm on-site substation. The second section of UGC is anticipated to be on final approach to the connection point at Blackhillock substation in the east (approximately 1 km in length).

2.3.2 Plate 2.1 shows a photograph of a typical wood pole trident line for illustrative purposes.

Plate 2.1: Wood Pole Trident Configuration



General Construction Activities

2.3.3 To facilitate this connection, the main construction elements of the project are as follows:

- Establishment of suitable laydown areas for materials and installation of temporary track solutions as necessary;
- Delivery of structures and materials to site;
- Assembly and erection of wood pole structures and stays;
- Stringing of conductors using hauling ropes and winches; and
- Inspections and commissioning.

2.3.4 Installation of the wood poles would involve the following tasks:

- Excavation of a suitable area for the wood poles, and backfilling after installation of the pole (backfilling would generally be carried out the same day as excavation so that no open excavations are left overnight). The exact area would depend on the ground conditions at each pole;
- In some pole locations, it may be necessary to add imported hardcore backfill around the pole foundations to provide additional stability where the natural sub soils have poor compaction qualities;
- Conductors would be installed on the wood poles using full tension stringing to prevent the conductor coming into contact with the ground; and
- Remedial works would be carried out to reinstate the immediate vicinity of the structures, and any ground disturbed, to pre-existing condition. This would be undertaken using excavated material.

Underground Cable

2.3.5 Where underground cables are to be utilised the installation would typically involve the following tasks:

- establish a working corridor approximately 30 m wide, centred on the cable centreline;
- excavate a trench up to 2 m in depth and 0.8 m wide, widening through benching and battering where stability and safety concerns arise;
- clear out all materials likely to damage cable ducts, e.g. clods, rocks, stones and organic debris, and employ use of pumps to remove any water;
- place cabling within the trench, surrounded by engineered backfill in suitable layers for protection, with marker boards placed above the cable line; and
- reinstate excavated surface layers in reverse order.

- 2.3.6 In some situations, for example to cross roads, rivers or pipelines, Horizontal Directional Drill (HDD) could be utilised. This would require the establishment of two temporary compounds (approximately 50 m by 50 m) at each end of the HDD alignment. Once the compounds were established the HDD would be progressed in four phases:
- Phase 1: Drill a narrow pilot hole on a pre-determined path;
 - Phase 2: Drill a larger hole following the alignment of the pilot hole;
 - Phase 3: Install cable ducts in the newly established hole; and
 - Phase 4: Install electrical cables within the ducts.
- 2.3.7 At the end of the drilling process the drilled material and sediment accumulated in the drill recycling tanks would be removed and disposed of or used for agricultural purposes in an appropriate manner. On the successful installation of the cables all temporary works would be removed and the land reinstated.

Forestry Removal

- 2.3.8 Construction of the project would likely require the removal of sections of woodland including commercial forestry and woodlands listed on the Ancient Woodland Inventory. Ongoing consultation is being undertaken with Forestry and Land Scotland (FLS), Scottish Forestry and other affected landowners and this will continue throughout the development of the project. In addition, the project would seek to adhere to Scottish Government's Control of Woodland Removal Policy.⁶
- 2.3.9 After felling, any timber removed that is commercially viable would likely be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.
- 2.3.10 An operational corridor would be required to enable the safe operation and maintenance of the OHL. This would vary depending on the type of woodland (based on species present) in proximity to the OHL, and the height of support structures used within each woodland area. In areas of native woodland it is usually possible to provide a narrower corridor due to a reduced risk of trees falling on the OHL.
- 2.3.11 Compensatory Planting will be considered for woodland removed as a direct result of the project.

Access during Construction

- 2.3.12 Vehicle access is required to each pole location during construction to allow excavation and creation of foundations and pole installation. Existing tracks would be used where possible. Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and temporary track solutions in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. These journeys would be kept to a minimum to minimise disruption to habitats along the route. However, temporary stone tracks may be necessary in some areas depending on existing access conditions, terrain and altitude.
- 2.3.13 It is anticipated that some new permanent access tracks may be required in certain areas along the OHL.

⁶ Forestry Commission Scotland (2009) Control of Woodland Removal Policy

3. CONSIDERATION OF ALIGNMENT OPTIONS

3.1 Introduction

3.1.1 The Consultation Document⁷ sets out the approach to the consideration and appraisal of alignment options, informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above'. The guidance sets out SSEN Transmission's approach to selecting a route for an OHL. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license holders:

- to have a 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 interests; and
- to do what they reasonably can to mitigate any effect that the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

3.1.2 In consideration of the principles outlined in the guidance document, the method of identifying a preferred alignment in this study has involved the following four key tasks:

- Review and update, where required, of the baseline situation established at Stage 2;
- Identification of alignment options;
- Environmental, engineering and cost analysis of alignment options; and
- Identification of an environmental, engineering and cost preferred alignment.

3.2 Identification of Preferred Alignment

3.2.1 The Preferred Alignment presented in the Consultation Document was selected on the basis that it was considered to provide an optimum balance of environmental, technical and economic factors. The overall preference identified through comparative analysis in the Consultation Document was the Baseline Alignment / Preferred Alignment. This alignment is presented on **Figure 1**.

3.3 Identification of Alignment Variants Generated Post Alignment Stage Consultation

3.3.1 As a result of the alignment stage consultation feedback, further alignment variants were developed to address consultee concerns. These were appraised between September 2021 and November 2022 in an Environmental Alignment Option Report Addendum,⁸ and an Alignment Selection Study Report.⁹ These Alignment Variants generated post alignment stage consultation can be seen on **Figure 2**. They were defined as centrelines; however, it was assumed that Limits of Deviation (LOD) of approximately 50 m either side of the alignment centreline would be applied to a final Proposed Alignment. This was considered where relevant. The previously identified Preferred Option based on the alignment options presented at consultation in September 2021 was thereafter called **Preferred Option 1** to avoid confusion.

3.3.2 The appraisal of these led to the selection of a Proposed Alignment. The Proposed Alignment, from west to east is **Preferred Option 1, with the addition of P-V1, P-V11, P-V12, P5-V2B, P-V4, P-V6, then Cable Option A or Cable Option B** for final approach into Blackhillock substation. This can be seen in **Figure 3**.

3.3.3 This has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and cost factors, as well as taking into account the key concerns of landowners.

⁷ SSEN Transmission (September 2021) Elchies Wind Farm Grid Connection Alignment Consultation Document

⁸ SSEN Transmission (November 2022), Environmental Alignment Option Report Addendum - Elchies (Rothes III) Wind Farm Grid Connection.

⁹ SSEN Transmission (November 2022): Alignment Selection Study Report - Elchies (Rothes III) Wind Farm Grid Connection.

4. THE CONSULTATION PROCESS

4.1 Consultation Overview

- 4.1.1 In accordance with SSEN Transmission's guidance,¹⁰ a process of consultation on the Preferred Route had previously been undertaken. Formal consultation was carried out during Stage 2 of this project in order to obtain comments from statutory and non-statutory consultees, including members of the public. Further direct consultation was also carried out with affected landowners.
- 4.1.2 In July 2020 a Consultation Report summarising the appraisals of the five route options was issued to statutory and non-statutory consultees for comment. **Appendix 1** summarises the feedback received from each consultee and the responses set out by SSEN Transmission within the Report on Consultation which followed. It was concluded that both Route Options A and A1 provided advantages over Route Options A2, B and C and could each offer a viable route and solution for the project from an environmental, engineering and cost perspective. However, on balance it was considered that **Route Option A1** was the preferred option as it crossed the Spey Valley for less distance compared with Route Option A, thereby reducing potential impacts on the SAC, DWPA, AGLV and CSLA. It also had greater opportunities to minimise felling and avoid sensitive habitats.
- 4.1.3 The responses issued by SSEN Transmission to consultees remain valid at this stage, and comments received have aided in selection of alignment options to appraise as part of this study.
- 4.1.4 In accordance with SSEN Transmission's guidance a similar process of consultation on the Preferred Alignment has now also been undertaken.

4.2 Methods for Consultation

- 4.2.1 The following methods were used to consult on the Preferred Alignment, as set out below.

Consultation Document

The Elchies Wind Farm Grid Connection Alignment Consultation Document (September 2021) was produced detailing the selection process for a Preferred Alignment, taking account of environmental, economic and technical factors. The Consultation Document on Alignment Selection was made available for download in September 2021 from <https://www.ssen-transmission.co.uk/projects/elchies-rothes-iii-wind-farm-grid-connection/>.

- 4.2.2 **Table 4.1** details the stakeholders in receipt of the Consultation Document or otherwise informed of the website details:

Table 4.1: List of Stakeholders

Stakeholders	
Statutory Consultees	
Energy Consents Unit (ECU)	Historic Environment Scotland (HES)
NatureScot	Scottish Environment Protection Agency (SEPA)
Moray Council	
Non-Statutory Consultees	
Network Rail	River Spey Fisheries Board
Scottish Gas Networks plc (SGN)	Scottish Forestry
Scottish Water	Speyside Community Council

¹⁰ SSEN (September 2020), Procedures for Routing Overhead Lines and Underground Cables of 132 kV and above

Stakeholders	
Spey District Fishery Board	Transmission Investment

4.2.3 Landowners, the local Community Council and ward councillors were made aware of the Consultation Document which was available via the dedicated project website referenced in 4.2.1. Updates were issued via email to project website subscribers, the local community council and ward councillors.

4.2.4 Feedback on the Consultation Document was requested by 15th October 2021.

Public Consultation Events

4.2.5 Public consultation events were held at the following times and locations to seek comments and feedback on the preferred alignment and design solution:

- Boharm Public Hall in Mulben, 28th September 2021, 14:00-19:00; and
- The Grant Hall in Rothes, 29th September 2021, 14:00-19:00.

4.2.6 Stakeholders were invited to provide feedback by answering a series of questions asked within the Consultation Document requesting comments on specific aspects of the project as follows:

- Have the requirements for the project been clearly explained?
- Have we been clear in providing the reasons for selecting our preferred alignment?
- Are there any additional factors, or environmental features, that you consider important and should be brought to the attention of the project team?
- Do you feel, on balance, that the preferred alignment selected is the most appropriate for further consideration at the EIA and Consenting stage?
- Do you have any other comments about our preferred alignment?

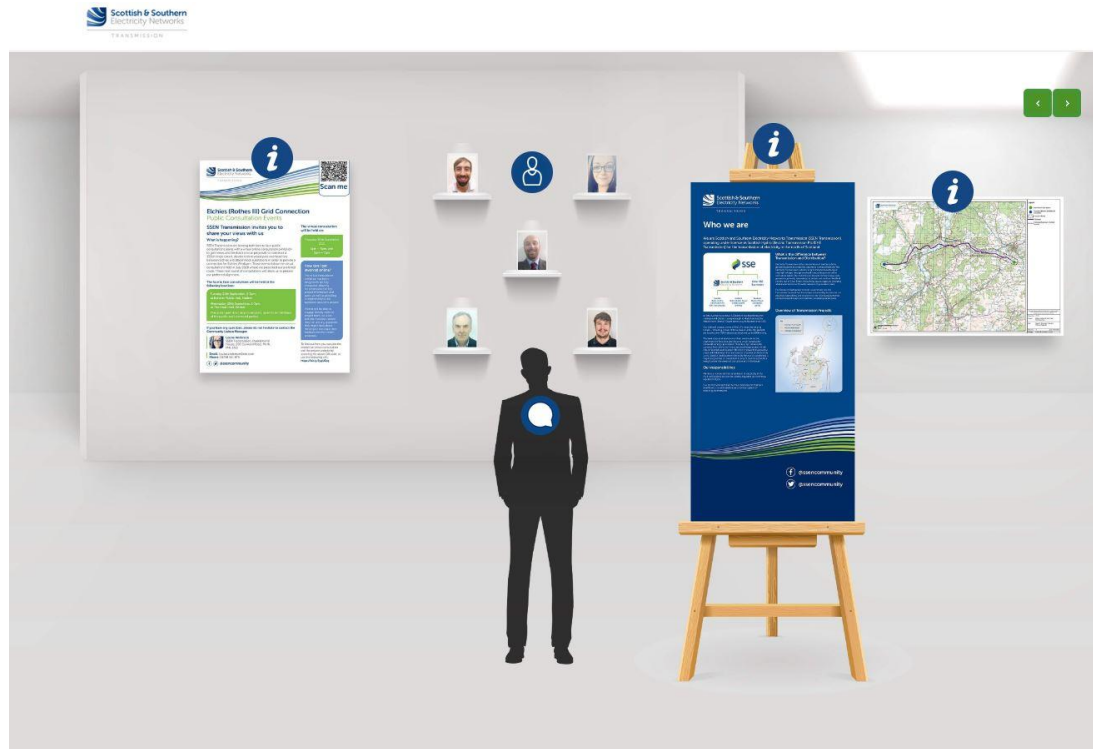
4.2.7 For the virtual consultation events, SSEN Transmission developed an online consultation tool, to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, interactive videos and the opportunity to share views on the proposals. This can be seen below on Plate 4.1.

4.2.8 Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current alignment options.

4.2.9 The virtual consultation events took place via the project website <https://www.ssen-transmission.co.uk/projects/elchies-rothes-iii-wind-farm-grid-connection/> at the following times:

- 30th September 2021; 13:00-15.00 and 17:00-19:00

Plate 4.1: Virtual Event Portal



- 4.2.10 The virtual consultation events were advertised in the local press, SSEN Transmission’s social media channels and the dedicated project management website. A mail drop informing of the event was also carried out to 4,305 households along the alignment options ahead of the virtual consultation.
- 4.2.11 Visitor counts during the virtual consultation event recorded 10 unique users (individual devices accessing the site) across the three interactive sessions. Two chats were initiated with the project team via the live chat function where four questions were asked. One associated follow up email was received by SSEN Transmission further to the virtual consultation events.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES

5.1 Introduction

5.1.1 **Table 5.1** sets out a summary of the feedback received by statutory and non-statutory consultees following the consultation period (September to October 2021). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action taken, where relevant.

5.1.2 The following consultees did not provide any feedback to the consultation:

- Moray Council
- SEPA
- Speyside Community Council

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	HES previously provided comments on the preferred route and route options for this project (response dated 29 June 2020). HES welcomed the continued involvement in the consultation process for this project.	This was noted. Any further updates will continue to be communicated to HES.
	HES considered the Consultation Document to clearly set out the requirement for the construction of the OHL. HES did not identify any factors or environmental features that have not been considered. However, HES considered that the rationale for selecting the preferred alignment in relation to cultural heritage interests was not always adequately explained. HES recommend that their Managing Change in the Historic Environment guidance note on setting should be used when considering setting impacts as the project progresses. They indicated that further good practice advice on the assessment of impacts on cultural heritage can also be found in Appendix 1 of the EIA Handbook.	This was noted. Any further updates will consult the Managing Change in the Historic Environment guidance note on setting. Further good practice advice on the assessment of impacts on cultural heritage will also be sought.
	<p>HES's response to the preferred route consultation indicated that there was the potential for impacts on the setting of a number of category A listed buildings either within or in close proximity to the proposed OHL route. These included:</p> <ul style="list-style-type: none"> • Boat of Brig Tollhouse (LB 2324) • Category A listed buildings in Keith • Mill of Towie (LB 2303) <p>Having reviewed the preferred alignment and the alternative alignments HES were satisfied that, given the small scale of the proposed OHL infrastructure and the distances from these structures, there would be no significant adverse effects on the setting of the assets.</p>	This was noted. SSEN Transmission will continue to endeavour to have no significant adverse effects on the setting of the assets.
	HES's response to the preferred route consultation indicated that there was the potential for impacts on two scheduled monuments within or in close proximity to the proposed OHL route. Having reviewed the preferred and alternative/variant alignments, HES were content that the principle of such a development in this location would not raise significant issues for HES interests such that they would object.	<p>These points were noted, and SSEN Transmission will continue to endeavour to not raise significant issues for HES SM interests such that HES would object.</p> <ul style="list-style-type: none"> • In relation to Rothes Castle (SM 2455), Alignment Variant P1 was not taken further than the consultation stage in September 2021. Despite this, and although the view is obscured by trees

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>HES would however recommend that impacts on two scheduled monuments are assessed, with visualisations considered and produced where necessary. This would be for:</p> <ul style="list-style-type: none"> • Rothes Castle (SM 2455): <ul style="list-style-type: none"> ○ HES noted that Preferred Option 1 was approximately 1.2 km northwest of the scheduled monument and given the size and location of the proposed infrastructure, they were satisfied that it would be unlikely to have a significant impact on the setting of the monument. ○ HES also noted that that Alignment Variant P1 included a proposed cable located east of the monument, and therefore direct impacts on the legally protected scheduled area of the monument should be avoided. They suggested though, that attention should also be given to assessing the impact on the setting of the monument from the Alignment Variant P1 OHL located 315 m south of the monument in views both from and towards it. HES stated that if a significant effect on the setting of the monument is identified, any assessment should be supported by appropriate visualisations. • Church of Dundurcas, old parish church (SM 5621): <ul style="list-style-type: none"> ○ HES suggested that it is unclear at present how important views from and of the church are, but its importance as focal point and its sense of place contribute to its setting. They suggested that any assessment of impacts on the setting of the church should consider whether views towards and from the church contribute to its significance and what impact an OHL of the scale proposed on the alignments would have on the church's setting. ○ HES noted that the monument would be located within just 125 m and possibly within the LOD of Preferred Option 1. In light of this, HES recommend that the proposed OHL is micro-sited in order to mitigate potential impacts. HES suggested that Alternative Alignment A, which is located further to the south, would be preferable for their interests in terms of mitigating the impact on this monument, providing other heritage assets are not adversely affected. 	<p>surrounding the castle remains and intervening commercial forestry, SSEN Transmission will prepare a bare-earth wireline visualisations representing the worst-case visibility scenario.</p> <ul style="list-style-type: none"> • In relation to Church of Dundurcas, old parish church (SM 5621), assessment of impacts on the setting of the church will consider whether views towards and from the church contribute to its significance and what impact an OHL of the scale proposed on the alignments may have on the church's setting. SSEN Transmission will prepare a bare-earth wireline visualisations representing the worst-case visibility scenario. Alternative Alignment A, was not taken further than the consultation stage in September 2021 due to other constraining factors such as natural heritage designations and access. The Proposed Alignment will be carefully micro-sited in order to mitigate potential impacts on this SM.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>HES found information relating to the potential impacts on historic environment assets to be limited, and found it difficult to understand what the potential impacts of the OHL might be on the setting of some designated assets. In particular, HES mentioned that:</p> <ol style="list-style-type: none"> 1. Paragraphs 7.2.33-7.2.37 Boat of Brig Tollhouse's (LB 2324) distance to Preferred Option 1 is not identified. 2. Paragraph 7.2.34 does not make any assessment of the potential impacts of Preferred Option 1 on the setting of Church of Dundurcas, old parish church (SM 5621), despite the very close proximity of this alignment to the scheduled monument. It is therefore difficult to understand how this alignment compares to the alternatives from the information provided in this document alone. 3. While paragraph 7.2.35 notes that Alternative Alignment A and Alignment Variant P1 are beyond 1 km from SM 5621, it does not indicate what effect this would have on the asset. It also notes that Alignment Variant P1 would bring the OHL within 500m of Rothes Castle (SM 2455) but does not indicate what effect this might have on the setting of the monument. 4. Paragraph 7.2.36 states that the introduction of an OHL to the southeast of SM 5621 from Alignment Variant P5 might lead to adverse impacts on its setting but does not explain what the impacts might be. In addition, Alignment Variant P5 appears to be located to the northeast of this monument (rather than southeast as stated) as shown on Figure 5 of the Consultation Document.¹¹ 5. There is no indication in the document of whether any of the alignment variants might impact on the setting of the category A listed Boat of Brighthouse (LB 2324) despite the proximity of Alignment Variant P5 and Alignment Variant A1. As indicated above, we are content that the alignments will not have a significant impact on the setting of this building, however there is no information in this document to show that these impacts have been considered during the selection process. 6. We note that 7.2.37 suggests that Alignment Variant P7 is less preferred but there is no explanation as to why this is the case. 	<p>It has been noted that HES found information relating to the potential impacts on historic environment assets to be limited, and found it difficult to understand what the potential impacts of the OHL might be on the setting of some designated assets.</p> <p>In relation to the specific paragraph points that HES mentioned:</p> <ol style="list-style-type: none"> 1. Boat of Brig Tollhouse's (LB 2324) distance to Preferred Option 1 is approximately 750 m. However, to cross the River Spey, the Proposed Alignment that will be taken forwards to EIA / EA consents stage will be P-V12 in this area, which is an alignment that was generated after the September 2021 consultation. This option would cross the River Spey much closer to Boat of Brig Tollhouse (within approximately 100 m). Any possible impacts on setting of the Category A Listed Building will be addressed in the EIA / EA. 2. Potential impacts of Preferred Option 1 on the setting of Church of Dundurcas, old parish church (SM 5621) were considered at this stage and compared to other alignment variants that would remain over 1 km from Dundurcas church. SSEN Transmission will prepare a bare-earth wireline visualisations representing the worst-case visibility scenario from this SM. 3. Neither Alternative Alignment A nor Alignment Variant P1 were taken further than the consultation stage in September 2021. However, SSEN Transmission will prepare a bare-earth wireline visualisations representing the worst-case visibility scenario from this SM. 4. Alignment Variant P5 was not taken further than the consultation stage in September 2021. 5. Please see point 1 for information on Boat of Brig Tollhouse. Impacts on this Category A Listed Building will be further considered at the EIA / EA stage.

¹¹ SSEN Transmission (September 2021): Consultation Document: Alignment Options - Elchies (Rothes III) Wind Farm Grid Connection

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Overall, HES state that they are satisfied that significant adverse effects on the site and setting of the nationally important designated assets within their remit can be avoided with appropriate mitigation. HES would be happy to provide advice around micro-siting of poles and any other mitigation required to ensure significant adverse effects are avoided. If it would be helpful, HES can also provide advice relating to requirements for visualisations to support further assessment.</p>	<p>6. Alignment Variant P7 was considered less preferable as it would be closer to three listed buildings as marked on <i>Figure 5.2- Cultural Heritage</i> of the Consultation Document.¹² Alignment Variant P7 was not taken further than the consultation stage in September 2021.</p> <p>This was noted. Where appropriate, SSEN Transmission will seek the advice of HES around micro-siting of poles and any other mitigation required to ensure significant adverse effects are avoided.</p>
NatureScot	<p>NatureScot commented on the work that SSEN Transmission progressed to reach alignment selection stage, and suggested it places SSEN Transmission in a well-informed position to progress to the Section 37 application and EIA / EA stages. NatureScot did not have any further comments to input at alignment consultation stage.</p>	<p>This was noted. Any further updates will be communicated with NatureScot.</p>
Non-Statutory		
Forestry and Land Scotland (FLS)	<p>FLS suggested that they would prefer, if at all possible, for the cable not to cross Scotland's National Forestry and Land (SNFL) because it would be yet another constraint to the sustainable management of the land. FLS acknowledged that most landowners and managers would take a similar view. If there is no alternative but to cross SNFL, FLS would be keen to ensure part of the forest did not become cut-off and isolated from the rest of the forest and that the overhead line did not restrict access for management.</p>	<p>The design has taken this into consideration, and where possible has avoided SNFL. Where there was no alternative but to cross SNFL, the design has reduced the area of the sections that would be cut off from the rest of the forest and where possible moved the poles so as not to impede access roads and reduce the impact on forestry operations</p>
	<p>FLS appreciated that Preferred Option 1 appeared to have taken into account it's preference for not having any new overhead power lines across SNFL. This said there are 4 locations where Preferred Option 1 crosses SNFL. In addition to the additional constraint to the forest's sustainable management created by the additional power line the parts of the preferred alignment that cross SNFL cut through some areas of mature crop. The loss of this crop will need to be subject to financial compensation and also,</p>	<p>Where the preferred line crosses SNFL, loss of this crop will be subject to financial compensation. It will also be ensured that this will comply with Scottish Government's 'Woodland Removal Policy', there would need to be compensatory planting of new woodland to replace woodland lost to the installation of the power line.</p>

¹² SSEN Transmission (September 2021): Consultation Document: Alignment Options - Elchies (Rothes III) Wind Farm Grid Connection

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>to comply with Scottish Government's 'Woodland Removal Policy', there would need to be compensatory planting of new woodland to replace woodland lost to the installation of the power line. The effected crop will have and increased risk of windthrow for several years after the wayleave is cut; the area subject to an increased risk of windthrow is likely to be in the order of 30 ha. When the risk of windthrow is increased by works instigated by third parties on SNFL the instigator of the works is liable to pay FLS compensation for any trees deemed to have been blown down because of the works. The level of compensation needs to be agreed as part of any agreement for creation of a wayleave for the proposed overhead cable.</p>	
	<p>FLS were pleased that SSEN Transmission decided that 'Alignment Variant P1' and 'Alignment Variant P6' were not included in the preferred alignment. FLS would strongly resist these 2 alignments as they would have a very significant impact on the management of the forest along the northern end of Ben Aigan.</p>	<p>This has been noted. No further alignment options were looked at in these two areas.</p>
	<p>In Rosarie, FLS pointed out that Preferred Option 1 would cross SNFL south of the A95. FLS suggested here that Alignment Variant A1 which travels north of the A95 might be preferable to avoid this.</p>	<p>Following the September 2021 consultation, new alignment variants were appraised in Rosarie. While travelling north of the A95 offered some benefits, ultimately Alignment Variant P-V6, which travels south of the road, was chosen to be part of the Proposed Development in Rosarie as it had the most preferable balance of environmental, engineering and cost constraints.</p>
	<p>After crossing the River Spey, south of Boat o' Brig, FLS pointed out that the SNFL Ben Aigan block (Wood of Knockmore) would be crossed by Preferred Option 1. FLS's preferred alignment of those being considered in this area would be part of 'Variant A', possibly combined with 'Alignment Variant P5'. If the FLS suggested alignment was used it should have no impact on the SNFL.</p>	<p>Following the September 2021 consultation, new Alignment Variant P-12 was appraised which branched into new Alignment Variant P5-V2B. The use of these two alignments, which became part of the Proposed Alignment reduces how much of the SNFL Ben Aigan block (Wood of Knockmore) would be crossed.</p>
<p>Scottish Forestry (SF)</p>	<p>At this stage Scottish Forestry did not have anything significant to add to the comments as submitted at routing stage. Once approval stage is closer, the expectation from SF will be that the compensatory planting (CP) and restocking elements will be conditioned by the appropriate planning authority to ensure no net loss of woodland results from the development of the Elchies export infrastructure or associated works. The standard arrangements are that the agreed mitigation/CP will be delivered through a forest plan approved by Scottish Forestry.</p>	<p>This was noted. Once approval stage is closer, CP and restocking elements will be conditioned by the appropriate planning authority to ensure no net loss of woodland. The agreed mitigation/CP will be delivered through a forest plan approved by Scottish Forestry.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Scottish Gas Networks plc (SGN)	<p>SGN raised concern in relation to High-Pressure Gas Transmission Pipelines A06, A09 and A10. SGN were concerned that the Elchies connection may have the potential to induce alternating currents and voltage onto pipelines which could result in pipeline damage. SGN also raised concern for the potential for the Elchies connection to detrimentally affect the effectiveness of the earthing system that has been installed to mitigate the issues of AC interference from the Blackhillock substation.</p>	<p>These concerns were noted.</p> <p>Alignment variants generated after the September 2021 consultation were designed with the locations of gas transmission pipelines in mind.</p> <p>Cable Option A and Cable Option B as generated after the September 2021 consultation are both being considered pending further engineering assessments. Their design will continue to take SGN pipelines into consideration coming into Blackhillock substation.</p>
	<p>SGN stated that it was their understanding that SSEN Transmission commissioned a study to understand the impact of the Elchies connection on SGN pipelines and existing AC mitigation system. SGN requested that the details of this study be shared with SGN once available, and the design of the installation shall take appropriate measures as recommended by the study to ensure the installation poses no threat to the integrity of SGN pipelines.</p>	<p>The details of this study were shared with SGN, and the design of the installation shall include appropriate measures as recommended by the study to ensure the installation poses no threat to the integrity of SGN pipelines.</p>
Scottish Water	<p>Scottish Water confirmed that they had no objection to this planning application; however, they suggested that SSEN Transmission should be aware that this does not confirm that the proposed development can currently be serviced.</p>	<p>This was noted.</p>
	<p>It was noted that the proposed activity would fall within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Spey Boreholes supply Badentinan Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring, Scottish Water should be notified immediately using the Customer Helpline number. If Scottish Water deem it necessary additional local Scottish Water contact details will also be provided to ensure operational teams are aware of the activity. Travel times of any pollution event will be short and water quality protection measures must be implemented and Scottish Water must be made aware of what these measures will be and when work will commence on site.</p>	<p>These points were noted. In the event of an incident occurring that could affect the Spey Boreholes supply Badentinan WTW, Scottish Water would be notified immediately using the Customer Helpline number. Should Scottish Water deem it necessary to have additional local Scottish Water contacts notified, SSEN Transmission will also do so.</p> <p>Water quality protection measures will be implemented, and Scottish Water will be made aware of what these measures will be and when work will commence on site.</p>
	<p>Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Scottish Water noted however, that site specific risks and mitigation measures will require to be assessed and implemented.</p>	<p>Scottish Water's list of precautions for a range of activities including protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area will be consulted as SSEN Transmission progress with the project. It was noted that site specific</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
		risks and mitigation measures will require to be assessed and implemented.
	Scottish Water suggested that the fact that this area is located within a drinking water catchment should be noted in future documentation. Also, anyone working on site should be made aware of this during site inductions.	The fact that this area is located within a drinking water catchment will be noted in future documentation. Anyone working on site will be made aware of this during site inductions.
	Scottish Water would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity.	SSEN Transmission will keep Scottish Water informed and involved as the project progresses.
	Scottish Water requested notification 3 months in advance of any works commencing on site.	Scottish Water will be notified 3 months in advance of any works commencing on site.
	Scottish Water noted that there is a large number of Scottish Water assets within the alignment options. Scottish Water stated that SSEN Transmission will need to obtain copies of Scottish Water's records from one of the assets plan providers to assess the potential impact on existing Scottish Water assets. Any proposed crossing of an existing Scottish Water assets needs to be agreed with Scottish Water.	SSEN Transmission will obtain copies of Scottish Water's records from the assets plan providers to assess the potential impact on existing Scottish Water assets. Any proposed crossing of an existing Scottish Water assets will be agreed with Scottish Water.
	Scottish Water will not accept any surface water connections into their combined sewer system. Where a surface water discharge to Scottish Water's combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. Scottish Water would then assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	No surface water connections into Scottish Water's combined sewer system will be made in relation to this project.
Spey Fishery Board	Spey Fishery Board suggest that the overhead crossing is in a very important area for Salmon Fishing. Spey Fishery Board enquired if SSEN Transmission have been in direct contact with the landowner.	The importance of the River Spey crossing point has been a key consideration for SSEN Transmission throughout the project and SSEN Transmission have been in regular contact with the landowners in the area.
	Spey Fishery Board raised concern related to the bio-security of the machinery that will be used around the river crossing in relation to invasive species arriving on Speyside.	The machinery that will be used around the river crossing will comply with all safety regulations and be bio-secure.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Transmission Investment	<p>Transmission Investment advised that the transmission assets for the Beatrice Windfarm are now owned by the Beatrice OFTO, whom Transmission Investment represent.</p> <p>Transmission Investment suggested that the consultation material did not give much detail on the specific routing of the cable at Blackhillock in relation to the OFTO's land.</p> <p>Transmission Investment stated that there is interest in the land to the west of the substation compound. There will still be a corridor on that side to cross the access road but there will be no cable corridor in the land for most of the western side of the substation.</p>	<p>This was noted. Following the September 2021 consultation process, Cable Option A and Cable Option B were generated to address constraints around Blackhillock substation, including planning constraints related to other developments.</p> <p>Both Cable Option A and Cable Option B are still under consideration pending further engineering assessments. Transmission Investment will be kept updated as design updates are made.</p>

6. COMMUNITY AND LANDOWNER RESPONSES

6.1 Public Exhibition Responses and Landowner Consultation

6.1.1 **Table 6.1** sets out a summary of the feedback received by the public and landowner following the consultation period (September to October 2021). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action that was taken, where relevant.

6.1.2 These consultation comments have been generally ordered by area and by topic.

Table 6.1: Public and Landowner Consultation Comments

Feedback Comments	Response by SSEN Transmission
Through and around Rothes, Preferred Option 1 was generally accepted as the preferred option, and Alignment Variant P1 and Alternative Alignment A were seen as particularly unfavourable options with consultees.	This was noted. Neither Alignment Variant P1 nor Alternative Alignment A were taken further than the consultation stage in September 2021.
To the northeast of Rothes, at Sourden Wood there was concern raised related to the potential impact on the ecology of the woodland, particularly in relation the Ospreys nesting nearby and the possible impact to their flight path to the River Spey.	<p>These concerns were noted. During protected species and habitat surveys conducted in 2021 and 2022, sensitive habitats were identified in Sourden Wood. These would be considered to present modest constraints which could be further reduced or eliminated by micro-siting infrastructure and/or adopting appropriate mitigation.</p> <p>In relation to the Osprey nesting sites, all alignment variants would be considered broadly equivalent to Preferred Option 1 in terms of constraints from Osprey.</p> <p>Following the September 2021 consultation, P-V11 was introduced as an option in this area. P-V11 would follow an existing forestry track through Sourden Wood to the east of Speyburn Distillery. Access through Sourden Wood may be difficult due to the steep slopes and the Burn of Sourden, however, P-V11 was chosen as part of the Proposed Alignment to go forwards to EIA / EA Stage due to reduced visual, proximity to dwelling and forestry constraints.</p>
Consultee feedback suggested an option to underground the connection between Sourden to Bridgeton might be favourable. It was understood by the consultees that SSEN Transmission has stated this would not be possible due to the gas pipeline in the area, though consultees suggested seeing a map of this pipeline would be helpful to understand the limitations.	<p>These concerns have been noted. Due to the gas pipelines here undergrounding the connection would not be possible.</p> <p>SSEN Transmission are in ongoing conversations with Scottish Gas Networks plc (SGN) regarding these gas pipelines.</p>
Consultee feedback suggested that a viewpoint car park overlooking the Delfur Haughland is not included in the mapping.	The viewpoint located at Grid Reference NJ 30628 51622 is going to be used as a location for a visualisations to demonstrate how the OHL will look in this area.
In relation to the crossing point of the River Spey:	These points were noted.

Feedback Comments	Response by SSEN Transmission
<ol style="list-style-type: none"> 1. To the east of the crossing point of the River Spey, consultee feedback suggested that SSEN Transmission have not considered the concern regarding the Bridgeton Farmhouse. 2. It was also pointed out that the public have not been supplied with a visualisation of what the crossing of the River Spey will look like. 3. It was noted that Preferred Option 1's crossing point of the River Spey would be over what is known as the <i>Broom pool</i>. It was suggested that this could add additional health and safety concerns for fishermen and SSE employees as the area to the south, the Bridgeton Haugh, floods regularly and can become inaccessible to any vehicle. 	<ol style="list-style-type: none"> 1. Following the September 2021 consultation, P-V12 was introduced as an option in this area. This would take the OHL further away from the Bridgeton Farmhouse and take the crossing point of the River Spey north to Boat o' Brig. 2. A viewpoint located at Grid Reference NJ 30628 51622 is going to be used as a location for a visualisations to demonstrate how the OHL will look in this area as it crossed the River Spey. 3. See response point 1.
<p>In the area surrounding Auchroisk Distillery attention was brought to Preferred Option 1 running through agricultural fields. There was concern around machinery manoeuvring around the poles.</p>	<p>This was noted. The Proposed Alignment considers the ability of machinery to manoeuvre around the poles in this area.</p>
<p>Through and around Mulben there were several points made by consultees, these are as follows:</p> <ol style="list-style-type: none"> 1. Alignment Variant P7 was seen as an unfavourable option. It was suggested that it was not clear why it was being considered given the proximity of a mains gas line. It was also commented on that it passes the fronts of several new build properties. 2. The potential for negative visual impacts on properties around Stoneyton that may be caused by Preferred Option 1 was also mentioned by consultees. 3. It was also suggested that the alignment should run closer to the railway line, to ensure the poles are located along field fence lines where possible. 4. In the area around Mulben, there was concern that areas used for sport shooting near the Mains of Farm might be affected as well as areas near Malcolmburn Bond Warehouses that might be used for future 	<p>These points were noted.</p> <ol style="list-style-type: none"> 1. It was noted that P7 was seen as an unfavourable option and it was not taken further than the consultation stage in September 2021. The option that was ultimately selected for the Proposed Alignment through Mulben (P-V4) travels to the north of the mains gas line and the new build properties. 2. This was noted. The option that was ultimately selected for the Proposed Alignment through Mulben (P-V4) considers this and travels parallel to the railway line passed the properties around Stoneyton to help limit visual impacts. 3. P-V4 runs closer/parallel to the railway line for longer. It also passes along field boundaries. 4. The design of P-V4 took these constraints into consideration. P-V4 travels to the east of the Mains of Farm rather than the north. P-V4 would avoid interaction with the Malcolmburn Bond Warehouses, to reduce

Feedback Comments	Response by SSEN Transmission
<p>developments.</p> <p>5. It was mentioned that the water treatment system at Stoneyton/Mulben should be considered.</p> <p>6. Consultees mentioned that the proposed alignment cuts through a section of woodland in Mulben that is home to several wildlife species.</p>	<p>potential constraints associated with the current and future planning proposals there.</p> <p>5. This was noted. Following the September 2021 consultation, P-V4 was appraised and ultimately chosen as the preferable alignment option through Mulben. It will pass between the areas consented for an ecological treatment system and earthwork improvements at the railway line in Craighead, Mulben.</p> <p>6. Careful micrositing will see and potential impacts on woodland in Mulben reduced.</p>
<p>Through and around Rosarie there were several points made by consultees, these are as follows:</p> <p>1. It was suggested that an option that goes more to the south of Rosarie Quarry might be preferred, as this land benefits from permission for potential future working and winning of minerals.</p> <p>2. It was suggested that it should be ensured that poles are located along field fence lines where possible.</p> <p>3. It was mentioned that several badger setts may be in the locale.</p>	<p>These points were noted.</p> <p>1. Following the September 2021 consultation, P-V6 was chosen as the preferable alignment in this area. It takes the potential expansion of the quarry southward into consideration.</p> <p>2. P-V6 will pass along field fence lines where possible.</p> <p>3. P-V6 as selected as part of the Proposed Alignment to go forwards to EIA / EA stage does not come to within 500 m of any known badger sett.</p>
<p>Around Blackhillock substation, it was suggested that undergrounding should be taken further north, up to the point where it crosses the public road or ensuring that poles are located along fence lines were possible.</p>	<p>This was noted. Following the September 2021 consultation, Cable Option A and Cable Option B were introduced. For Cable Option A undergrounding is taken further north, up to the point where it crosses the public road and ensuring the poles are located along fence lines were possible, while Cable Option B takes a new path to the south also located along fence lines were possible. Both Cable Option A and Cable Option B are still under consideration pending further engineering assessments.</p>
<p>It was suggested that SSEN Transmission may want to clarify to the public that this project is dependent on the wind farm itself gaining approval.</p>	<p>This has been noted.</p>
<p>Consultees asked for clarification in relation to the basis of the costings for this OHL and the associated connection costs levied to the Developer; who is understood to be the sole beneficiary of the route in order to connect the Elchies III windfarm to the grid. It was suggested that it is unclear as to linkage between the cost of the route and the connection</p>	<p>This has been noted.</p>

Feedback Comments	Response by SSEN Transmission
<p>charge where the Developer has elected to use SSE to procure the necessary route.</p>	
<p>Clarification was asked if the poles to be used would be like those shown in the pictures in the brochure published in July 2020, not like those used in the Cabrach for the Dorenell windfarm.</p>	<p>The poles are referred to as a trident design which consists of 2 wooden poles with a cross bracing between them. The trident wood poles would vary between 10 – 18m depending on the span length required. However, the average height of the structures across the line will be 14m (including insulators and support). Single circuit, 3 wires would run horizontally along a frame on top of the poles. The picture referred to (as shown above in Section 2.3) is a typical example of the trident wooden pole design. Which is different to the composite pole design used on the Dorenell Project which are significantly larger structures and a double circuit design.</p>
<p>It was queried if 100 m buffers surrounding housing is from the edge of houses or from the edge of the gardens.</p>	<p>The 100m buffers would be the minimum distance the poles and line would be from a residential building based on the OS dataset. Consideration would always be to ensure pole positions are located to minimise any impact.</p>
<p>It was suggested that it was unclear what additional stays and guys would be necessary on wooden Trident Poles to accommodate changes of direction.</p>	<p>Angle/strain structures will be used where necessary. Angle/strain structures are important components of an overhead line and are used in various scenarios, such as changes in direction or for inline strain positions for uplift and/or anti-cascade purposes. Angle/strain structures present challenges in both overhead line design and construction requiring more significant foundations as well as more challenging installation. The exact number of angle/strain structures required can only be determined accurately at the detailed design stage.</p>
<p>Consultees suggested that a detailed explanation as to why the current poles cannot be upgraded to take the new lines thus avoiding two sets across the same area would be welcomed.</p>	<p>The existing wood pole line is a 33kV line and the Elchies (Rothes III) Wind Farm Connection is proposed to be a 132kV line. The existing wood pole line therefore does not have the capacity to support the new connection.</p> <p>In some areas the option to underground the existing distribution lines is being considered to help minimise the visual effects of multiple OHLs.</p>

7. PROJECT RESPONSES TO CONSULTATIONS

7.1 Overview

7.1.1 This part of the Report summarises how the project has responded to the consultation responses arising from the Preferred Alignment set out within the Elchies Wind Farm Grid Connection Alignment Consultation Document. Responses to each of the points raised by stakeholders through the consultation process are included in Sections 5 and 6 above. As previously mentioned, primarily, the action taken following the consultee responses received after the September 2021 consultation, was the generation and appraisal of additional alignment variants.

7.1.2 The alignment variants that were assessed post alignment stage consultation between September 2021 and November 2022 against Preferred Option 1 are listed below with the reasons why they were introduced:

- Alignment Variant P-V1 – Generated to address consultee feedback and due to further engineer investigation works in the Rothes Estate west of the town of Rothes, and on the agricultural land to the northeast of the town of Rothes;
- Alignment Variant P-V2 - Generated to address consultee feedback and due to further engineer investigation works to the north and northeast of the River Spey's prominent northern meander and the properties at Kirkhill;
- Alignment Variant P-V3 - Generated to address consultee feedback and due to further engineer investigation works to the southeast of Auchroisk Distillery;
- Alignment Variant P-V4 - Generated to address consultee feedback and due to further engineer investigation works through Mulben;
- Alignment Variant P-V5 - Generated to address consultee feedback and due to further engineer investigation works through Rosarie;
- Alignment Variant P-V6 - Generated to address consultee feedback and due to further engineer investigation works through Rosarie;
- Alignment Variant P-V7 - Generated to address consultee feedback and due to further engineer investigation works through Rosarie;
- Alignment Variant P-V11 - Generated to address consultee feedback and due to further engineer investigation works passing through Sourden Wood, and to the north of the River Spey's prominent northern meander;
- Alignment Variant P-V12 - Generated to address consultee feedback and due to progressing works assessments in the area to the west of the crossing point of the River Spey, west of Boat o' Brig;
- Alignment Variant P5-V1 – Generated to address consultee feedback and due to further engineer investigation works in the area passed over after the crossing of the River Spey near to Boat o' Brig;
- Alignment Variant P5-V2(A/B) - Generated to address consultee feedback due to further engineer investigation works in the area passed over after the crossing of the River Spey near to Boat o' Brig;
- Alignment Variant P5-V3 - Generated to address consultee feedback and due to further engineer investigation works in the area passed over after the crossing of the River Spey near to Boat o' Brig;
- Cable Option A - Generated to address consultee feedback and due to further engineer investigation works around Blackhillock substation; and
- Cable Option B - Generated to address consultee feedback and due to further engineer investigation works around Blackhillock substation.

7.1.3 To address the other points raised above, the following actions are being undertaken:

- From a cultural heritage perspective, SSEN Transmission are preparing bare-earth wireline visualisations representing the worst-case visibility scenario from Rothes Castle (SM 2455) and Church of Dundurcas, old parish church (SM 5621). Where appropriate, SSEN Transmission will seek

the advice of HES around micro-siting of poles and any other mitigation required to ensure significant adverse effects on cultural heritage assets are avoided.

- It will be ensured that any loss of Scotland's National Forestry and Land crop will comply with Scottish Government's 'Woodland Removal Policy', there would need to be compensatory planting of new woodland to replace woodland lost to the installation of the power line. Once approval stage is closer, CP and restocking elements will be conditioned by the appropriate planning authority to ensure no net loss of woodland. The agreed mitigation/CP will be delivered through a forest plan approved by Scottish Forestry.
- The details of the study that SSEN Transmission commissioned to understand the impact of the Elchies connection on SGN pipelines and existing AC mitigation system has been shared with SGN.
- Scottish Water will be notified 3 months in advance of any works commencing on site and any proposed crossing of an existing Scottish Water assets will be agreed with Scottish Water.
- Additional visualisations will be prepared showing how the connection will look from:
 - A point near to a picnic area off the A941 to the northwest of the town of Rothes;
 - A point south of the B9015 looking north to Sourden wood;
 - A viewpoint located at Grid Reference NJ 30628 51622 overlooking the crossing point of the River Spey;
 - A point near the properties around Stoneyton; and
 - A point near the properties in Mulben.

7.1.4 All comments and considerations to date will be taken forward into the EIA / EA and consenting stage, through which assessments will be carried out for all relevant environmental aspects. This process will remain inclusive, seeking further consultation where appropriate.

8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

- 8.1.1 The proposed Rothes III Wind Farm (capacity 99 MW) in Moray requires connection to the electricity transmission network Blackhillock substation by June 2025. It is anticipated that this would be achieved via the construction and operation of a new 132 kV single circuit Overhead Line (OHL). It is anticipated that the connections into Rothes III on-site substation (approximately 500 m in length) and Blackhillock substation (approximately 1 km in length) will be via underground cable (UGC).
- 8.1.2 This Report on Consultation documents the consultation process which was undertaken for the project between September 2021 and October 2021. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred alignment option.
- 8.1.3 This report has described the key responses received and provides detail on the actions proposed in response to the issues raised, mainly the development and appraisal of several additional alignment variants between September 2021 and November 2022.
- 8.1.4 Although the September 2021 Alignment Consultation Document concluded that the Baseline Alignment / Preferred Option 1 as set out within the Alignment Consultation Document, should be taken forward as the Proposed Alignment, the alignment variants generated post alignment consultation stage were preferable in many ways. Thus, following the environmental, engineering and cost appraisal of these further alignments between September 2021 and November 2022, as well considering the consultation feedback; a combination of Preferred Option 1 and some of the alignment variants generated post alignment stage consultation are being taken forwards as the Proposed Alignment to Stage 4: EIA / EA and consenting. The Proposed Alignment can be seen in **Figure 3**. Both Cable Option A and Cable Option B are still under consideration pending further engineering assessments.
- 8.1.5 The alignment was selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors.

8.2 Next Steps

- 8.2.1 The project will now be taken into Stage 4 (EIA / EA and consenting). Should further site and desk-based analysis at the EIA / EA and Consenting stage identify a particular constraint, a further review of the Proposed Alignment may be required.