Scottish & Southern Electricity Networks

TRANSMISSION

Consultation Document – Alignment Options

Elchies (Rothes III) Wind Farm Connection

September 2021

REF: LT122

Scottish & Southern Electricity Networks
TRANSMISSION

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GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line, 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 consent application. 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 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.
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.

Term	Definition
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 plc 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 Consultation Document 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 (herein referred to as 'SHE Transmission'). The document has been prepared to seek comments from all interested parties on the preferred alignment identified for the proposed Rothes III Wind Farm 132 kV overhead line between Rothes III wind farm on-site substation and Blackhillock substation near Keith.

The Consultation Document is available online at the project website:

https://www.ssen-transmission.co.uk/projects/elchies-rothes-iii-wind-farm-grid-connection/

Given the easing of COVID-19 restrictions in-person consultation events will take place for this project. However, to ensure wider access and engagement virtual consultation events will also be held.

SSEN Transmission has 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 has been 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 will be able to engage directly with the project team, via a live chat function, where they can ask any questions they might have about the project and share their feedback on the current alignment options.

In-person consultation events will be taking place at the following times:

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

The virtual consultation events will be taking place via the project website at the following times:

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

Comments on this Consultation Document should be sent to:

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All comments are requested by **15 October 2021.**

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.

This Consultation Document invites comments from all interested parties on the preferred alignment identified, following an alignment selection process. This follows previous consultation on the project in the selection of a preferred route[1] and confirmation of a proposed route[2] (see **Figure 1**).

Alignment options have been identified within the proposed route and appraised against a series of environmental, technical and economic considerations.

The alignment options identified are displayed on **Figure 2.** A preferred alignment has been selected to provide an optimum balance of environmental, technical and economic factors, and is displayed on **Figure 11**.

It is anticipated that an application for consent for a proposed alignment will be submitted in autumn 2022.

When providing comments and feedback on this Consultation Document, SSEN Transmission would be grateful for your consideration of the questions below:

- 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?

[1] SSEN Transmission: Elchies (Rothes III) Wind Farm Grid Connection: Consultation Document (July 2020).
[2] SSEN Transmission: Elchies (Rothes III) Wind Farm Grid Connection: Report on Consultation – Route Options (September 2020).

1. INTRODUCTION

1.1 Purpose of Document

1.1.1 This Consultation Document invites comments from all interested parties on the preferred alignment identified for the proposed 132 kV overhead line between Rothes III Wind Farm on-site substation and Blackhillock substation near Keith.

1.1.2 This Consultation Document describes the alignment options appraisal undertaken, the alternatives considered during the selection of alignment[3] options, and the identification of a preferred alignment. Comments are now sought from statutory authorities, key stakeholders, elected representatives and the public on the alignment selection process and the preferred alignment identified.

1.1.3 All comments received will inform further consideration of the preferred alignment, prior to selecting a Proposed Alignment to take forward into the EIA and Consenting stage.

1.2 Document Structure

1.2.1 This report is comprised of eight sections as follows:

1: Introduction – setting out the purpose of the Consultation Document;

2: The Proposals – describes the need for the proposals, the proposed technology solution and the typical construction methods;

3: Alignment Selection Process – sets out the alignment selection process and methodology that has been applied to date;

4: Consultation to Date – summarises the consultation feedback received at Route Selection stage;

5: Description of Alignments – describes the alignment options that have been identified;

6: Environmental Baseline – describes the local context and baseline environmental and engineering context;

7: Comparative Appraisal – analyses each alignment option against a series of environmental, technical and economic considerations to arrive at a preferred alignment; and

8: Consultation on the Proposals – invites comments on the alignment selection process and identification of a preferred alignment, and outlines the next steps for the project.

1.2.2 The main body of this document is supported by a series of figures and an appendix detailing the consultation responses received at the routeing stage.

1.3 Next Steps

1.3.1 As part of the consultation exercise, comments are sought from members of the public, statutory consultees and other key stakeholders on the preferred alignment option put forward in this report.

1.3.2 A Report on Consultation will be produced which will document the consultations received, and the decisions made in light of these responses to inform the selection of a Proposed Alignment.

1.3.3 Following the identification of a Proposed Alignment, the project will move on to the EIA and consenting stage.

[3] A centre line of an overhead line, along with the location of key angle structures.

2. THE PROPOSALS

2.1 The Need for the Project

2.1.1 SSEN Transmission is a wholly owned subsidiary of the SSE plc group of companies. SSEN Transmission owns and maintains the electricity transmission network across the north of Scotland and holds a license under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.

2.1.2 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 on-site substation and Blackhillock substation (see **Figure 1**). This transmission 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 distribution network and this will be known as the Rothes III Wind Farm connection. SSEN Transmission are not responsible for this connection to the distribution network and therefore it is not considered further in this report.

2.2 Preferred Technology Solution

2.2.1 Based on the technology options assessed, the preferred solution is a new 132 kV single circuit OHL 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.

2.3 Alternative Technology Options Considered

2.3.1 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 preferred alignment. However, until a preferred 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.

2.3.2 Technical requirements may dictate that the approach to Blackhillock substation may need to be underground cable.

2.4 Proposals Overview

2.4.1 The trident wood poles would have a nominal height of approximately 16 m (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.

General Construction Activities

2.4.2 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.

2.4.3 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.

Plate 2.1: Wood Pole Trident Configuration

2.4.4 No expansion of Blackhillock substation outwith the current boundary is expected to support this development.

Underground Cable

2.4.5 Were underground cable to be utilised for short sections, its 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 6 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.

2.4.6 In some situations, for example to cross roads or rivers, 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.

2.4.7 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

2.4.8 Construction of the project would likely require the removal of some sections of commercial forest, which would be undertaken in accordance with the UK Forestry Standard[4] and in consultation with Forestry and Land Scotland (FLS) and affected landowners. Scottish Forestry would also be consulted throughout the development of the project and the project will seek to adhere to Scottish Government's Control of Woodland Removal Policy[5].

2.4.9 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.

2.4.10 An operational corridor would be required to enable the safe operation and maintenance of the OHL. This will vary depending on the type of woodland (based on species present) in proximity to the OHL. 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.

2.4.11 Compensatory planting will be required for woodland removed as a direct result of the project.

Access during Construction

2.4.12 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.

2.4.13 It is not anticipated that new permanent access tracks would be required.

[4] Forestry Commission (2017) The UK Forestry Standard
[5] Forestry Commission Scotland (2009) Control of Woodland Removal Policy

Programme

2.4.14 It is anticipated that construction of the project would take place over an 18-month period, following the granting of consents, although detailed programming of the works would be the responsibility of the Contractor in agreement with SSEN Transmission.

2.4.15 Every effort would be made to minimise disturbance to landowners, local residents and other stakeholders during construction by providing regular updates on works and restrictions via the site manager, community liaison manager and corporate affairs team.

2.5 Biodiversity Net Gain

2.5.1 Biodiversity Net Gain (BNG) is a process which leaves nature in a better state than it started. Although it is an internationally recognised process and tool within the development industry, it is not a term that is widely used or implemented in Scotland[6]. A small handful of businesses are making voluntary commitments to incorporating BNG into their projects, including SSEN Transmission.

2.5.2 SSEN Transmission has developed a BNG toolkit based upon the Natural England metric[7], which aims to quantify biodiversity based upon the value of habitats for nature. It is an efficient and effective method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works.

2.5.3 For BNG to be used appropriately and to generate long-term gains for nature, the good practice principles established by the Business and Biodiversity Offset Programme (BBOP)[8] should be followed. These principles have been established in the context of UK development by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA)[6].

2.5.4 BNG does not apply to statutory designated sites or irreplaceable habitats (e.g. ancient woodland[9], blanket bog)[10].

SSEN Transmission's Biodiversity Ambition

2.5.5 SSEN Transmission is committed to protecting and enhancing the environment by minimising the potential impacts from their construction and operational activities. As part of this approach, SSEN Transmission has made commitments within its Sustainability Strategy (2018)[11] , Sustainability Plan (2019)[12] and RIIO-T2 Business Plan, for new infrastructure projects to:

- Ensure natural environment considerations are included in decision making at each stage of a project's development;
- Utilise the mitigation hierarchy to avoid impacts by consideration of biodiversity in project design;

[6] CIEEM. 2019. Biodiversity Net Gain in Scotland. CIEEM Scotland Policy Group. https://cieem.net/wp-content/uploads/2019/06/Biodiversity-Net-Gain-in-Scotland-CIEEM-Scotland-Policy-Group.pdf
[7] Natural England Biodiversity Metric 2.0 http://publications.naturalengland.org.uk/publication/5850908674228224
[8] Guidance Notes to the Standard on Biodiversity Offsets (2012). Business and Biodiversity Offsets Programme (BBOP). https://www.forest-trends.org/wp-content/uploads/imported/BBOP_Standard_Guidance_Notes_20_Mar_2012_Final_WEB.pdf
[9] Categories 1a and 2a.
[10] CIRIA, CIEEM, IEMA (2019). Biodiversity Net Gain: Good practice principles for development, A Practical Guide. https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf
[11] Delivering a smart, sustainable energy future: The Scottish Hydro Electric Transmission Sustainability Strategy (2018) https://www.ssen-transmission.co.uk/media/2701/sustainability-strategy.pdf
[12] Our Sustainability Plan: Turning Ambition into Action. (2019) SHE Transmission. https://www.ssen-transmission.co.uk/media/3215/our-sustainability-plan-consultation-report.pdf

- Positively contribute to the UN and Scottish Government Biodiversity strategies by achieving an overall 'No Net Loss' on new infrastructure projects gaining consent in 2020 onwards and achieving Net Gain on projects gaining consent in 2025 onwards; and
- Work with their supply chain to gain the maximum benefit during asset replacement and upgrades.

2.5.6 The design and evolution of this project will be carried out in line with these commitments.

3. ALIGNMENT SELECTION PROCESS

3.1 Guidance Document

3.1.1 The approach to alignment selection was 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 The guidance develops a process which aims to balance these environmental considerations with technical and economic considerations throughout the route options process.

3.1.3 The guidance splits a project into six stages, as follows:

- Pre-Routeing Activities: Selection of proposed connection option;
- Stage 0: Routeing strategy development;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection;
- Stage 3: Alignment Selection; and
- Stage 4: EIA and Consenting.

3.1.4 The stages that are carried out can vary depending on the type, nature and size of a project and consultation is carried out at each stage of the process as appropriate. This project is currently at Stage 3: Alignment Selection, the objective of which is to identify a preferred alignment to be taken forward for consultation prior to selection of a Proposed Alignment and commencement of the EIA and consenting stage.

3.1.5 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 and technical analysis of alignment options; and
- Identification of an environmentally and technically preferred alignment.

3.2 Selection of a Corridor

3.2.1 A Corridor was identified within which the identification and assessment of route options could be completed. The Corridor was developed to encompass a range of feasible route options between the two connection points at Rothes III Wind Farm on-site substation and Blackhillock substation.

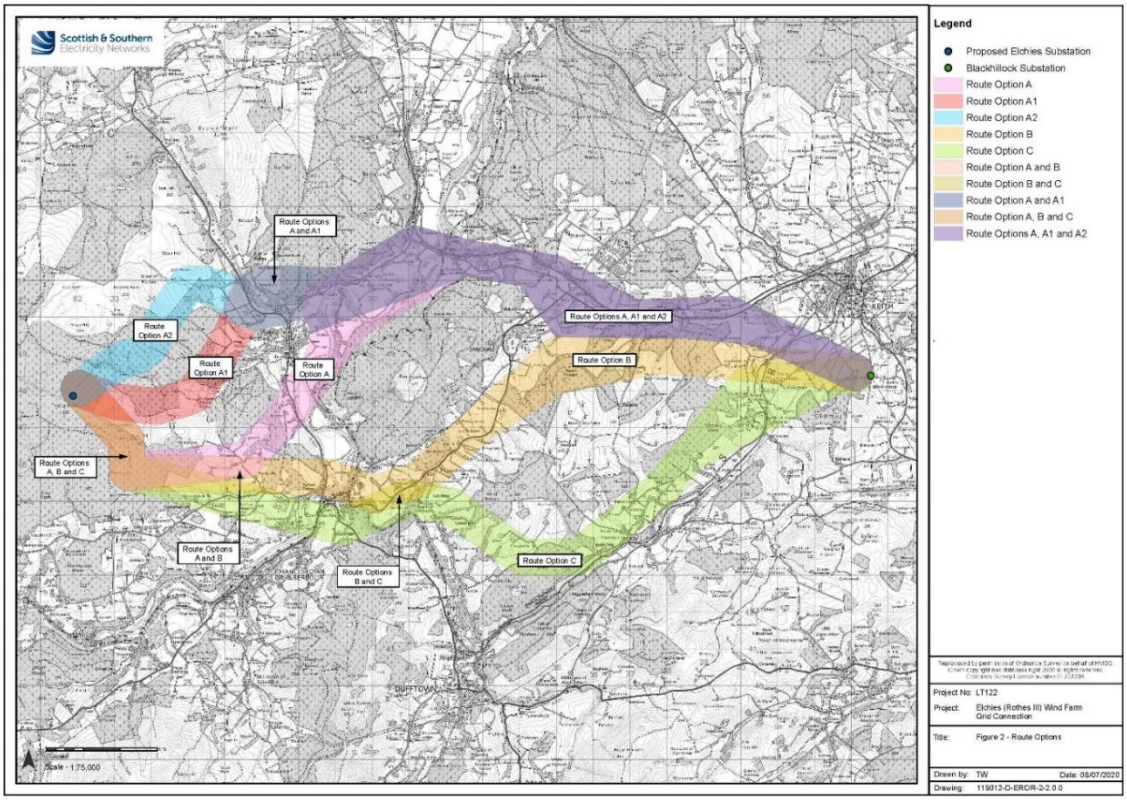
3.3 Selection of a Proposed Route

3.3.1 A Route Selection process was carried out between June 2020 and October 2020[13], [14]. Indicative route options were defined with approximately 1 - 2 km widths to allow for subsequent identification of alignments during Stage 3 (Alignment Selection) of the project. A Proposed Route based on comparative route appraisals

[13] SSEN Transmission: Elchies (Rothes III) Wind Farm Grid Connection: Consultation Document (July 2020).
[14] SSEN Transmission: Elchies (Rothes III) Wind Farm Grid Connection: Report on Consultation – Route Options (September 2020).

and subsequent consultation with statutory consultees and other stakeholders was then selected to progress to the alignment selection stage. **Plate 2.2** below indicates the route options considered.

Plate 2.2: Route Options



3.3.2 Of these, Route Option A1 was considered to be the overall preference when considering environmental, engineering and economic constraints to development and feedback from consultees. It was recognised that the proposed route runs through a sensitive environment with challenging terrain in places. However, it has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors.

3.3.3 Alignment options were then established within the Proposed Route. Given the nature and location of constraints within the Proposed Route, a 'base' alignment option was established and a number of variations to the alignment set out as alternative options. The alignment options identified are displayed on **Figure 2.**

3.3.4 Section 4 of this Report provides a summary of the consultation undertaken to date for the route options appraised.

3.4 Baseline Conditions

3.4.1 A desktop study, supplemented by site appraisal, has been carried out at stages throughout the route and alignment selection process to identify a range of potential constraints and opportunities within the study area, and its adjacent context. Establishment of the baseline involved the following activities:

- Identification of environmental designated sites and other constraints, utilising GIS datasets available via SNHi Site Link[15];

[15] SNH. SNHi Site Link. [online] Available at:: http://www.snh.gov.uk/publications-data-and-research/snhi-information-service/

- Identification of archaeological designations and other recorded sites, utilising GIS datasets available via Historic Environment Scotland[16,17] and Moray Historic Environment Record (HER)[18];
- SEPA interactive Flood Risk Mapping[19];
- Review of the Moray Local Development Plan (2020)[20] to identify further environmental constraints and opportunities, such as regional level designations or other locations important to the public;
- Review of landscape character assessments of relevance to the corridor[21];
- Review of Native Woodland Survey of Scotland and Ancient Woodland Inventory data sets[22];
- Review of Ordnance Survey (OS) mapping (1:50,000 and 1:25,000 and online GIS data sources from OS OpenData) and aerial photography (where available) to identify other potential constraints such as settlement, properties, walking routes, cycling routes etc.;
- Extrapolation of OS Vectormap GIS data to identify further environmental constraints including locations of watercourses and waterbodies, roads classifications and degree of slope;
- Review of other local information through online and published media such as tourism sites and walking routes;[23, 24]
- Review of major infrastructure located in the environs including but not limited to electrical crossings, railroad crossings, river crossings and buried services (cables and pipelines), and:
- Review of ground conditions including identification of peat deposits using Ordnance Survey (OS) mapping and determining potential access routes.

3.4.2 Further survey effort has been carried out to consider alignment options, including ecological walkover surveys. These walkover surveys obtained further site data and observations of localised constraints, such as signs of European Protected Species and composition of forestry. The results of these walkover surveys have informed the assessments presented herein.

3.5 Alignment Identification and Selection Methods

3.5.1 Alignment options were established within the Proposed Route based on the key environmental and engineering constraints identified during Stage 2: Route Selection.

3.5.2 The steps outlined in the Holford Rules[25] and SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above', have been taken into account as far as is practicable in considering alignment options:

- Avoid if possible major areas of highest amenity value (including those covered by national and international designations and other sensitive landscapes).
- Avoid by deviation, smaller areas of high amenity value.
- Try to avoid sharp changes of direction and reduce the number of larger angle towers required.
- Avoid skylining in key views and where necessary, cross ridges obliquely where a dip in the ridge provides an opportunity.

16 Historic Environment Scotland Data Services. Portal. [online] Available at: http://portal.historicenvironment.scot/

17 Royal Commission on Ancient and Historical Monuments of Scotland. Canmore. [online] Available at:: http://canmore.rcahms.gov.uk/

18 Aberdeenshire Archaeology Service. Moray Historic Environment Record. [online] Available at: https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Moray

19 Scottish Environmental Protection Agency. SEPA Flood Maps [online] Available at: http://map.sepa.org.uk/floodmap/map.htm

20 Moray Council (2020). Moray Local Development Plan 2020

21 Scottish Natural Heritage. (2019). Scottish Landscape Character Types Map and Descriptions [online] Available at: https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscape-character-types-map-and-descriptions

22 Available at data.gov.uk

23 Munro Magic [online] Available at: http://www.munromagic.com/

24 Walk Highlands [online] Available at: http://www.walkhighlands.co.uk/

25 Scottish Hydro Electric Transmission Limited (SHETL). (October 2004). *The Holford Rules: Guidelines for the Routeing of New High Voltage Overhead Transmission Lines with NGC 1992 and SHETL 2003 Notes; Revision 1.01*

- Target the alignment towards open valleys and woods where the scale of poles will be reduced and views broken by trees (avoid slicing through landscape types and try to keep to edges and landscape transitions).
- Consider the appearance of other lines in the landscape to avoid a dominating or confusing wirescape effect.
- Approach urban areas through industrial zones and consider the use of undergrounding in residential and valued recreational areas.

3.6 Appraisal Method

3.6.1 Appraisal of alignment options has involved systematic consideration against the environmental, engineering and cost topic areas included in **Table 3.1**.

Table 3.1: Environmental Topic Areas Considered

	Category	Sub-Topic
Environmental	**Natural Heritage**	Designations
		Protected Species
		Habitats
		Ornithology
		Geology, Hydrology and Hydrogeology
	Cultural Heritage	Designations
		Cultural Heritage Assets
	People	Proximity to Dwellings
	Landscape and Visual	Designations
		Character
		Visual
	Land Use	Agriculture
		Forestry
		Recreation
	Planning	Policy
		Proposals
Engineering	**Infrastructure Crossings**	Major Crossings (132kV, 275kV, Rail, 200+m wide river, navigable canal, gas or hydro pipeline)
		Road Crossings
	Environmental Design	Elevation
	Ground Conditions	Terrain
		Peat
	Construction / Maintenance	Access
		Angle/Strain Structures
	Proximity	Clearance Distance
Cost	**Capital**	Construction, Diversions, Public Road Improvements, Felling, Land Assembly, and Consents Mitigations
	Operational	Inspections and Maintenance

Rating of Alignment Options

3.6.2 At Stage 2, a Red, Amber or Green (RAG) rating was applied to each topic area within each section, indicating potential constraint to development. The RAG rating approach is considered too broad at Stage 3 as it could

generally result in similar ratings for all options. Instead, a more descriptive appraisal is adopted, allowing for more detailed considerations of the differences in constraint to development between each option.

Identification of a Preferred Alignment

3.6.3 The overall objective throughout the appraisal of alignment options has been to take full consideration of all factors to minimise any potential adverse impacts on the environment whilst taking into account technical and cost considerations. Following review and consideration of the potential alignment options, a preferred alignment was arrived at, as discussed in this Report.

4. CONSULTATION TO DATE

4.1 Introduction

4.1.1 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. This Section of the Report provides a summary of this.

4.2 Route Stage Consultation Summary

4.2.1 In 2020 the Elchies (Rothes III) Wind Farm Grid Connection Consultation Document (July 2020) was produced detailing the selection process for the preferred route, taking account of environmental, economic and technical factors. Early feedback on the preliminary findings of the Consultation Document was distributed to statutory consultees for initial comment in June 2020. The Consultation Document was made available for download in July 2020.

4.2.2 The responses issued to SSEN Transmission by consultees remain valid at this stage, and comments received have aided in the selection of alignment options to appraise as part of this study. **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 is noted that Route Option A1 was presented as the Preferred Route to consultees at this stage.

4.2.3 Virtual public consultation events were held on 8th and 9th July 2020 to present the route options to members of the public local to the area and invite questions and comments. **Appendix 1** summarises the feedback received by the local community following the consultation period (June to August 2020), including comments received during the live virtual consultation events. It also includes responses by SSEN Transmission, setting out the action to be taken where relevant.

4.3 Statutory Consultee Consultation Summary

4.3.1 A summary of key Statutory Consultee responses is as follows.

4.3.2 Historic Environment Scotland (HES) emphasised that 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. SSEN Transmission noted these comments and stated that further work to consider potential impacts on the historic environment would 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.

4.3.3 NatureScot noted that the preferred route crosses the River Spey and a large portion it is within the river's catchment with potential to impact on tributaries and wetlands linked to the river system. The River Spey is designated as 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. SSEN Transmission stated that further environmental and engineering studies would 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.

4.3.4 SEPA had no specific overall preference of route option, but where applicable provided advice on route preferences in regard to specific issues. Reference will be made by SSEN Transmission where appropriate to SEPA guidance documents prior to an application being submitted. Dialogue with SEPA will also be maintained throughout the project by SSEN Transmission.

5. DESCRIPTION OF ALIGNMENTS

5.1 Identification of Alignment Options

5.1.1 This section of the Report describes each of the alignment options identified for appraisal, which are displayed on **Figure 2**. Alignment options have been defined as centrelines; however, it is assumed that Limits of Deviation (LOD) of approximately 100 m would be applied to the Proposed Alignment at Stage 4, and this has been considered where relevant through the appraisal. The alignment options assessed are listed below:

- Preferred Alignment
- Alignment Variant P1
- Alignment Variant P2
- Alignment Variant P3
- Alignment Variant P4
- Alignment Variant P5
- Alignment Variant P6
- Alignment Variant P7
- Alignment Variant P8
- Alternate Alignment A
- Alignment Variant A1

5.1.2 The majority of variants are named as P variants as they diverge from the Preferred Alignment. However, Alternate Alignment A and its variant A1, diverge significantly from the Preferred Alignment and as such have been identified differently.

5.2 Preferred Alignment

5.2.1 The Preferred Alignment represents the preferred 'base' alignment from which all other options deviate. Alignment options were identified and updated through an iterative process considering environmental, engineering and cost considerations. This allowed for constraints to be identified early and non-viable routes discounted. The Preferred Alignment is proposed to be generally OHL with HDD/Cable towards the eastern end on the final approach to Blackhillock substation, though the exact transition location has yet to be identified at this stage.

5.2.2 The Preferred Alignment travels generally in an easterly direction between the proposed Rothes III Wind Farm On-Site Substation via Rothes, Boat o' Brig and Mulben before heading southeast to Blackhillock substation prior to reaching Keith. The Preferred Alignment leaves Rothes III Wind Farm on-site substation in an easterly direction through commercial forestry and to the north of Hunt Hill and Cairn Cattoch before turning north-eastward to begin its descent towards Rothes. It does not pass directly through the town of Rothes. Instead, the Preferred Alignment crosses the A941 to circle around the northern edge of the settlement to Auchinroaths and then travels back down, southeast past Speyburn Distillery.

5.2.3 Towards the end of its circle around the northern edge of Rothes towards Auchinroaths, the Preferred Alignment would travel directly east for approximately 250 m, through forestry to the northeast of Speyburn Distillery. It would then continue through the forest in a northeast direction on the northern side of the B9015 and River Spey. The Preferred Alignment would then travel southeast to cross the B9015 and join the Preferred Alignment east of the River Spey's prominent northern meander but west of Dundurcas Farm.

5.2.4 The Preferred Alignment would then continue north-eastward over arable fields before crossing the River Spey south of Boat o' Brig. The Preferred Alignment then turns in a generally eastward direction and stays south of the B9103. It continues generally eastwards passing to the south of Auchroisk Distillery.

5.2.5 The Preferred Alignment then crosses the B9103 and extends northeast to pass around the northern side of Mulben, passing close to the southern side of the Spey Valley Brewery and Malcolmburn Bond Warehouses. It then curves back down in a south-easterly direction following the field boundaries towards the railway line and the A95 before continuing eastward. It then crosses the railway and the A95 between the Glentauchers Distillery and Rosarie. It travels in a generally eastward direction and continues to follow the A95, railway and Burn of Mulben on their southern side.

5.2.6 Approximately 2 km from Keith, the Preferred Alignment turns to the southeast again toward Blackhillock Substation passing to the south of Wood of Maisley before crossing a minor road and the B9014 prior to reaching Blackhillock Substation.

5.3 Alignment Variant P1

5.3.1 Alignment Variant P1 is proposed to be a mix of OHL and HDD/Cable, though the exact transition locations have yet to be identified at this stage.

5.3.2 Alignment Variant P1 departs from the Preferred Alignment to the west of Rothes as an OHL taking a more southerly route across forestry then arable fields to reach Rothes. Transitioning to HDD/Cable, the variant enters Rothes' most southern point from the west, rather than travelling to the north of the town as the Preferred Alignment does. It then travels north through the town along the A941. Upon reaching a fairly central point within the town the variant turns northeast along Green Street, passing by Rothes Primary School before turning southeast to exit the town's eastern side via Greenfield Lane.

5.3.3 After leaving Rothes, the variant continues to follow Greenfield Lane south-eastward before approaching the banks of the River Spey. It travels north for approximately 250 m before passing under the River Spey in a north-easterly direction. After crossing the river, the variant briefly passes through some forestry, before cutting across farmland. It would transition back to an OHL close to the banks of the River Spey on the eastern side of a southern meander. It would remain on the southern side of the river without crossing it again, travelling northeast to re-join the Preferred Alignment to the south of Boat o' Brig.

5.4 Alignment Variant P2

5.4.1 Alignment Variant P2 is proposed to be an OHL. It would depart from the Preferred Alignment to the north and west of Rothes. It extends generally east and crosses arable fields to the west of Rothes before turning northeast to cross the A941 and Broad Burn to the southeast of the Speyburn Distillery, rather than circling around Auchinroaths and the Speyburn Distillery as the Preferred Alignment does. It remains to the south of these, and crosses the A941 at a more southern point. Alignment Variant P2 then re-joins the Preferred Alignment shortly after crossing Broad Burn remaining north of the B9015.

5.5 Alignment Variant P3

5.5.1 Alignment Variant P3 is proposed to be HDD/Cable and begins to the northeast of Rothes before crossing the broad floodplain of the River Spey south of the B9015. It would cross the River Spey twice on the river's northern meander as a HDD/Cable. After this, to the south of the B9015 around Dundurcas Farm, the alignment would re-join the Preferred Alignment.

5.6 Alignment Variant P4

5.6.1 Alignment Variant P4 is proposed to be a combination of OHL and HDD/Cable. It would travel south-eastward from the Preferred Alignment as an OHL before curving around the northern bank of the prominent meander in the River Spey that lies to the east of Rothes as an underground cable. It would re-join the Preferred Alignment to the east of the northern tip of the meander south of the B9015 and west of Kirkhill Farm.

5.7 Alignment Variant P5

5.7.1 Alignment Variant P5 is proposed to be an OHL. It diverges from the Preferred Alignment near Dundurcas Farm travelling in a north-easterly direction to the south of Kirkhill Farm following the existing 33 kV OHL to the B9013. It continues to follow the existing OHL across the River Spey passing just south of Boat o' Brig. It would then follow the alignment of Alternative Alignment A starting west of Auchroisk Distillery then cross the Burn of Mulben, remaining to the north, past Auchroisk Distillery to re-join the Preferred Alignment to the northwest of Mulben.

5.8 Alignment Variant P6

5.8.1 Alignment Variant P6 is proposed to be an OHL. It diverges from the Preferred Alignment to the southeast of Bridgeton. It travels to the south of the Preferred Alignment through a large conifer plantation consisting of Cummings Wood and the Woods of Knockmore in a generally eastern direction for approximately 1.5 km before re-joining the Preferred Alignment directly south of Auchroisk Farm and Distillery.

5.9 Alignment Variant P7

5.9.1 Alignment Variant P7 is proposed to be an OHL. It diverges from the Preferred Alignment to the southeast of Auchroisk Distillery. It then extends southeast and east to pass around the south of Mulben. It crosses the A95 to the east of Balnabreich and then travels northeast crossing the A95 again and the railway line to the south of The Tam to re-join the Preferred Alignment.

5.10 Alignment Variant P8

5.10.1 Alignment Variant P8 is proposed to be an OHL. It departs from the Preferred Alignment to the north of Mulben and to the south of the Spey Valley Brewery, Malcolmburn Bond Warehouses and Shandston. The variant follows the field boundaries across Gallow Hill in a south-easterly direction before turning sharply south for approximately 500 m to re-join the Preferred Alignment to the north of the A95 and the railway line.

5.11 Alternate Alignment A

5.11.1 Alternate Alignment A is proposed to be an OHL. It is a significant diversion from the Preferred Alignment, through the floodplain of the River Spey and towards Mulben. It diverges from the Preferred Alignment at the River Spey's northern meander to the east of Rothes traveling southeast. It crosses the River Spey a total of three times, twice across the river's prominent northern meander that lies to the east of Rothes. It continues in a northeast direction for approximately 2 km, where it crosses the River Spey for a third time to the south of the point where the Preferred Alignment crosses the river for the first time.

5.11.2 After crossing the River Spey for the third time, Alternate Alignment A then extends northeast towards Boat o' Brig which it passes to the east of. It crosses the railway before turning east and passing through woodland to the north of Auchroisk Distillery. It re-joins the Preferred Alignment to the north of Mains of Mulben.

5.11.3 Alternate Alignment A then follows the Preferred Alignment until after it has passed through Rosarie. It then diverges from the Preferred Alignment again west of Keith to the south of Hillockhead on the south side of the A95. The OHL would cut eastward through the Wood of Maisely. It would travel southeast to the northern side of Maisley which the Preferred Alignment passes to the south of, before then crossing a minor road and the B9014 southwest of Keith. Shortly after crossing the roads, it would re-join the Preferred Alignment leading to Blackhillock substation, replacing the Preferred Alignment HDD/Cable as an OHL.

5.12 Alignment Variant A1

5.12.1 Alignment Variant A1 is proposed to be an OHL. This variant diverges from the Preferred Alignment, as with Alternate Alignment A. However, it also diverges from the Alternative Alignment A west of Rosarie and

Glentauchers Distillery. It travels generally east remaining to the north of Rosarie and the A95. After passing Rosarie, the variant then travels directly south crossing the railway line and the A95 before turning to travel southeast and re-joining the Alternate Alignment A.

6. ENVIRONMENTAL BASELINE

6.1 Introduction

6.1.1 This section of the report discusses the environmental baseline with respect to the Proposed Route, within which the consideration of alignment options has been undertaken.

6.1.2 The Proposed Route is located within the local authority area of Moray, a predominantly rural region whose main centres of population are located at Elgin, Forres, Buckie, Keith and Lossiemouth.

6.1.3 Within the Proposed Route, settlement is largely confined to the town of Rothes, as well as some scattered townships and smaller communities, such as Mulben, located along the main roads. The main local centre for the area, Keith, is located just outside the route, at its eastern edge. Aberlour is located outwith the Proposed Route, to the south.

6.1.4 The River Spey and Spey Valley, located toward the west of the Proposed Route, offer a particular focus for the area in terms of its scenic qualities, ecological importance, recreational and heritage value. There is a distinctive sense of place associated with the historic management and identity of Speyside as an important landscape for fishing, recreation and whisky distilling.

6.1.5 The area is served by the A95, which provides a route between Keith, Mulben and Aberlour and onwards to Aviemore, and the A941 which runs between Dufftown and Elgin, passing through Craigllachie and Rothes.

6.1.6 There are three B roads through the Proposed Route comprising; the B9014 connecting Keith to Drummuir and Dufftown beyond; the B9015 connecting Rothes and Inchberry passing through the north-western edge of the Proposed Route; and the B9103, travelling along the northern edge, connecting the B9015 with the A95.

6.1.7 The Aberdeen to Inverness rail link runs through the north of the Proposed Route, typically running to the north of the A95 and B9103 between Keith and Boat o' Brig before heading north. To the south, the Keith and Dufftown heritage railway operates a recreational service between March and September.

6.1.8 Other electrical and gas infrastructure also exists in the Proposed Route in the form of 11 kV and 33 kV wood pool overhead lines, 132 kV and 275 kV steel lattice transmission lines and Blackhillock substation. A Scottish Gas Network (SGN) Pipeline that requires a 40 m buffer is present in the area between Rothes and Keith.

6.2 Environmental Designations

6.2.1 The following environmentally designated sites or areas afforded recognition or protection within planning policy are present within the vicinity of the Proposed Route (see **Figures 3 - Figure 10**).

- The River Spey along and the lower reaches of Broad Burn (at Rothes) and Burn of Mulben (at the B9103 crossing of the Spey) is designated as a Special Area of Conservation (SAC). Qualifying features for the designated sites include Atlantic salmon, freshwater pearl mussels, otter, and sea lamprey, many of which are recognised as particularly sensitive to changes in water quality.
- The River Spey is also designated as a Site of Special Scientific Interest (SSSI) for Atlantic salmon, freshwater pearl mussel, sea lamprey and otter. SSSIs are those areas of land and water that SNH consider best represent our natural heritage – its diversity of plants, animals and habitats, rocks and landforms, or a combination of such features;
- The Spey Valley Special Landscape Area (SLA);
- Designated cultural heritage assets comprising Scheduled Monuments (SM), Listed Buildings (LB) and Conservation Areas (CA); and
- A number of woodlands within the Proposed Route are categorised as ancient woodland on the Ancient Woodland Inventory (AWI). Generally, the woodlands present are categorised as long-

established woodlands of plantation origin (LEPO) (1b and 2b), though there is some Ancient Woodland (1a and 2a) category also present.

6.2.2 In addition, the River Spey, River Fiddich and River Isla are designated as drinking water protection areas (DWPAs) serving local treatment works from wellfields and abstraction points along the rivers.

6.3 Natural Heritage

6.3.1 The Proposed Route generally comprises a complex mosaic of farmland and woodland. Woodland areas are dominated by conifer plantations, but there are numerous fragments of broadleaved and mixed woodland associated with riparian zones, field boundaries, road and railway sides, and around settlements. Some areas of woodland are categorised as Ancient Woodland (1a and 2a) and LEPO (1b and 2b) on the Ancient Woodland Inventory (AWI).

6.3.2 Agricultural land within the Proposed Route is dominated by pasture and arable field systems. Arable fields are more prevalent on low-lying ground along river floodplains and in the eastern areas near Blackhillock. Pasture is generally improved and occupies gentle hillsides. Areas of rough pasture are dominant on higher ground, and in more remote areas of agricultural land. Unimproved areas are generally dominated by rush-pasture and occupy field edges and riparian zones.

6.3.3 Other habitats present include heathlands on high ground near Hill of Towie and Lochend Wood. Heathlands are also present to the north of the B9102, to the northwest of Ardcanny Wood and at Hill of Towie. Mire and bog habitats are present on north flanks of Hunt Hill, as well as a pinewood plantation at Stoneyton and a mature pinewood at Craighead.

6.3.4 Protected species such as otter, pine marten, badger, bat species, red squirrel, Atlantic salmon and freshwater pearl mussel are either known, or likely, to be present within the Proposed Route based on the presence of suitable habitat or being a qualifying feature of a nearby designated site. Signs of badger and pine martin were observed within the Proposed Route in high-level walkover in April 2021.

6.3.5 During the course of breeding bird surveys undertaken in 2021 birds of conservation concern recorded include Osprey (listed on Schedule 1 of the Wildlife & Countryside Act 1981, as amended by the Nature Conservation Act (Scotland) 2004. Other species of interest include the red-listed Curlew, Grey wagtail, Herring gull, House sparrow, Linnet, Skylark, Song thrush, Tree pipit, Yellowhammer and amber-listed Bullfinch, Common gull, Common sandpiper, Dunnock, Golden plover, Mallard, Meadow pipit, Oystercatcher, Sand martin, Swift and Willow warbler.

6.4 Water and Soils Environment

6.4.1 Priority peatland mapping[26] suggests that the Proposed Route is generally absent of peatland. However, there are small, isolated areas of Class 1 (nationally important carbon-rich soils, deep peat and priority peatland habitat, likely to be of high conservation value) recorded in areas such as the headwater catchments of the Burn of Rothes within the western extent of the Proposed Route. This area of Class 1 peatland lies within a larger area of Class 5 (peat soils with no peatland vegetation). Another isolated area of Class 5 peatland is recorded along Loan Burn, to the south of Hill of Mulderie. The presence of peat is not considered a development constraint and most of the soils have a low value. It is also likely that micrositing can be used to mitigate any potential effects.

6.4.2 Superficial geology mapping shows that virtually all of the Proposed Route is underlain by Glacial Till and alluvium and/or glacio-fluvial sand and gravel is shown to overlie the Till adjacent to larger watercourses. The bedrock geology is characterised by sedimentary conglomerates, low grade metamorphics of quartzites,

[26] Scottish Natural Heritage. (2016). Carbon and Peatland 2016 Map. [online] Available at: http://gateway.snh.gov.uk/natural-spaces/index.jsp

psammites, semipelites and igneous intrusions, generally separated by inferred faults. Neither the superficial or solid geology are rare and do not pose a development constraint. Bedrock is recorded to outcrop at surface on hill tops.

6.4.3 The western extent of the Proposed Route crosses numerous watercourses with steep surface gradients in their catchment that can result in potential rapid mobilisation of suspended solids and pollutants during construction without appropriate controls.

6.4.4 The River Spey, downstream of Craigellachie, is designated as a surface water drinking water protection area (DWPA) that serves the water treatment works (WTW) at Badentinan. Groundwater is abstracted from shallow wellfields adjacent to the River Spey between the towns of Inchberry and Mosstodloch, approximately 5 km to the north. The wellfield is likely to be in hydraulic continuity with the River Spey and will therefore, be vulnerable to pollution. The Proposed Route crosses the River Spey DWPA for approximately 4.5 km. A second DWPA is designated for the River Isla upgradient of its confluence with the Burn of Haughs at Keith. The Proposed Route crosses the lower section of the River Isla DWPA for approximately 2.5 km. Subject to best practice construction techniques that safeguard water quality, the Spey and Isla DWPAs are not considered a development constraint.

6.5 Cultural Heritage

6.5.1 Baseline information on known cultural heritage assets recorded within the vicinity of the Proposed Route was obtained from datasets curated by Historic Environment Scotland and the Highland Historic Environment Record (HER).

Designated Cultural Heritage

6.5.2 Designation is the legal recognition of some of Scotland's most important historic sites, buildings and places. It ensures that these assets are protected by law through the planning system and other regulatory processes. Designation includes Scheduled Monuments (SM) and Listed Buildings and the level of protection and how a site or place is managed varies depending on the type of designation.[27]

6.5.3 There are few cultural heritage designations within the Proposed Route. The following are located within it:

- One SMs, with statutory protection of National importance (high sensitivity): Church of Dundurcas, Old Parish Church;
- One Category A Listed Buildings: the Boat of Brig Tollhouse;
- Five Category B listed Buildings:
    - Mulben Mill;
    - Mulben Station;
    - Railway Bridge, Boat o'Bridge;
    - Glebe House and Garden Walls; and
    - Dundurcas Old Church Burial Ground;
- Two Category C listed building.

6.5.4 Though all are considered unlikely to be affected by a new OHL within the Proposed Route.

Cultural Heritage Assets

6.5.5 In addition to these there are few cultural heritage assets within the Proposed Route, these being:

[27] Historic Environment Scotland. (2019). *Designation Policy and Selection Guidance*.

- One HER Site of Reginal Significance: Braes of Collie, Cropmark;
- 122 Local Significance HER Sites.

6.5.6 These are also considered unlikely to be affected by a new OHL within the Proposed Route.

6.6 Landscape Character, Landscape Designations and Visual Amenity

6.6.1 Landscape character within the Proposed Route and surrounding area[28] ranges between small scale rolling farmland contrasting with simple forested valley slopes and moorland summits. Rural dwellings and scattered farms are clustered along transportation routes while settlements are focused around the rivers feeding the historic distilleries of the area.

6.6.2 There is a distinctive sense of place particularly in the western part of the Proposed Route associated with the historic management and identity of Speyside as an important landscape for fishing, recreation and whisky distilling. As a result, human habitation is also a regular feature within the landscape of this area particularly around Rothes.

6.6.3 The eastern part of the Proposed Route is characterised by conifer plantations, overhead lines and other infrastructure, including Blackhillock substation and wind turbines within the wider landscape.

Designations

The Preferred Route passes through the Spey Valley SLA landscape designation that recognise the highly valued and sensitive views of the Spey Valley and its '*diverse and handsome landscape of broad gently weaving river, floodplain farmland, wooded valley sides and distinctive settlements together with the romance associated with the Spey due to its connection with whisky distilling*.'

6.6.4 The Preferred Route passes through approximately 6.9 km of the SLA. This area is characterised by the meandering River Spey and forested slopes that contain the valley on the northern edge. Rothes sits on the western bank of the River Spey just to the south of the route along the A941 within the SLA.

Potential Visual Receptors

6.6.5 Visual receptors within and in the vicinity of the Proposed Route are comprised of three different types:

- Views from built properties including residential areas and places of work;
- Views from routes including roads and recreational routes; and
- Views from other outdoor locations where the view is considered of recreational importance.

6.6.6 Visual receptors associated with the Proposed Route are comprised mostly of properties and distilleries in the area. Some areas of particular visual constraint will be:

- Pinch points between properties and the main transportation routes.
- Around Mulben where, should the alignment follow the elevated ground to avoid the settlement it could overlook the A95 and residential properties.
- Felling visible from residential properties and main transportation routes.
- Views of the River Spey and surrounding floodplain.

6.6.7 Recreation is discussed further in Section 6.7 below.

[28] In discussing landscape character (and visual amenity), it is important to consider the wider context as opposed to only the localised areas within the Proposed Route itself, since the experience of the landscape character is influenced by features in the surrounding area.

6.7 Land Use and Recreation

6.7.1 This section considers land use and recreation within the Proposed Route, specifically forestry, agriculture, and recreational use and amenity.

Forestry

6.7.2 Forestry is a common land use throughout the Proposed Route, with a number of productive conifer plantations on a fell and restock cycle. Many of these plantations form part of the National Forest Estate and are managed by the Scottish Government's agency FLS. **Figure 8** shows the distribution of forest on the National Forest Estate. Private woodland, comprising both a mix of conifer and mixed broadleaf woodland, also exist within the Proposed Route.

6.7.3 The Proposed Route encounters several woodland areas from small shelterbelts and hedgerow trees to parts of commercial conifer plantations. Some woodlands are listed within the AWI as plantation from maps of 1860 and continuously wooded since and/or in the Native Woodland Survey of Scotland (NWSS). Generally, the woodlands present identified as AWI are categorised as LEPO (1b and 2b), though there is a small section of Ancient Woodland (1a and 2a) category also present around Auchroisk Distillery.

6.7.4 The Proposed Route may encroach on native woodland. Native woodland is defined as woodlands where the canopy cover is composed mainly of native species (i.e. over 50 %). Native woodland is identified through the NWSS, a survey of all native woodlands, nearly native woodlands and non-native Plantations on Ancient Woodland Sites (PAWS) in Scotland. This spatial data shows the type, extent and attributes of these woodland areas. Within the Proposed Route the woodland types identified comprise mainly of:

- NWSS wet woodland;
- NWSS Upland birchwood;
- NWSS native pinewood;
- Ancient Woodland, recoded in the AWI. In Scotland, Ancient Woodland is defined as land that is currently wooded and has been continually wooded since at least 1750.
- AWI Long Established (of Plantation origin) (LEPO) (1b and 2b) 1860. In Scotland, LEPO is interpreted as plantation from maps from 1750 (1b) or 1860 (2b) that have been continuously wooded since. Many of these sites may have developed semi-natural characteristics, which may be as rich as Ancient Woodland.

6.7.5 The Proposed Route also crosses areas conifer plantation.

Agriculture

6.7.6 Areas of agricultural land are classified by The Macaulay System of Land Capability for Agriculture.[29] Based on this data, land at the origin of the Proposed Route around the proposed Rothes III Wind Farm on-site substation, and scattered throughout is Class 5.2, which is land capable of use as improved grassland that has few anticipated problems with pasture establishment but may be difficult to maintain.

6.7.7 Around Rothes there are areas of Class 4.1, which is land capable of producing a narrow range of crops, primarily grassland with short arable breaks of forage crops and cereal, and Class 3.1, which is land capable of producing consistently high yields of a narrow range of crops and/ or moderate yields of a wider range, where short grass leys are common.

[29] The James Hutton Institute. (2020). *Land Capability for Agriculture in Scotland*. [online] Available at: https://www.hutton.ac.uk/learning/exploringscotland/land-capability-agriculture-scotland [Accessed 11 September 2020].

6.7.8 Sections of Class 4.2, which is land capable of producing a narrow range of crops, primarily on grassland with short arable breaks of forage crops are present near Boat o' Brig and Blackhillock substation.

6.7.9 Sections of Class 3.2, which is land capable of average production though high yields of barley, oats and grass can be obtained where grass leys are common are present around Mulben.

6.7.10 Agricultural land classifications are displayed on **Figure 9**.

Recreation

6.7.11 The Proposed Route and in particular the Spey Valley, is popular with walkers, hikers, cyclists, canoeists, anglers, whisky enthusiasts and heritage railway enthusiasts. Tourism, including the pursuit of recreational activities (particularly fishing) contributes significantly to the local economy annually.

6.7.12 There are a large variety of points of recreational interest around the Proposed Route, many of which are also valued as tourist sites. These include places appreciated for their cultural heritage, historic, recreation and landscape and visual attributes. There are also tourist information points, whisky distilleries, mountain biking trails, fishing beats[30], canoe/kayak landing/launch sites, caravan parks and campsites, picnic sites, gardens, golf courses, museums and other landmarks distributed near the Proposed Route, often clustered near settlements, along main roads and near to other sites of tourist interest. These are illustrated on **Figure 10**.

6.7.13 There is a concentration of internationally renowned whisky distilleries within the Spey Valley and surrounding area, drawing water from the Spey River and its tributaries. Some of the better known of these include, but are by no means limited to, The Macallan Estate, Glenfiddich Distillery, and the Aberlour Distillery. The annual Spirit of Speyside Festival celebrates the industry and gives visitors a chance to sample whiskeys from across the region and visit distilleries that are not always open to the public. The distilleries that the Proposed Route come closest to include Glentauchers Distillery, Auchroisk Distillery, and Speyburn Distillery.

6.7.14 Other tourist attractions within the wider area include the Keith and Dufftown Railway, Telford Bridge at Craigellaiche and various estates and castles that are open to the public.

6.7.15 There are a large number of walking routes distributed in proximity to the Proposed Route. These include the Speyside Way, a long-distance walking route (linking the Moray coast to the Grampian Mountains), and Core Paths (see **Figure 10**). The Speyside Way is also accessible to cyclists and horses. There are also numerous walking trails maintained by Forestry and Land Scotland such as those on Ben Aigan, the summit of which provides open views across Moray and to the coast to the north.

6.7.16 There are a number of annual competitive races that run near the Proposed Route, including The Dramathon from Glenfarclas Distillery to Glenfiddich Distillery, and the Speyside Way Race Ultra Marathon from Ballindalloch to Buckie.

6.7.17 The Malt Whisky Trail running through the area is a sign-posted three-day tour of seven world-famous working distilleries, one historic distillery and the Speyside Cooperage.

6.8 Planning

National Policy

6.8.1 Scotland's third National Planning Framework (NPF3) was published by the Scottish Government on 23rd June 2014. NPF3 is a long-term strategy for Scotland and is the spatial expression of the Government's Economic Strategy and plans for development and investment in infrastructure.

[30] The fishing season runs from 11th February to 30th September each year.

6.8.2 Scottish Planning Policy (SPP) was also published on 23rd June 2014. The SPP is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed.

Regional and Local Policy

6.8.3 The Scottish Development Plan system is comprised of Strategic Development Plans (SDPs) and Local Development Plans (LDPs). SDPs cover the four largest city regions and provide strategic policy direction on the management of land use and new development. LDPs cover all local authority areas and provide detailed and site-specific planning policy for an area, in accordance with the SDP where applicable.

6.8.4 In July 2020 a new LDP created by Moray Council was adopted. The 'Moray Local Development Plan 2020'[31] sets out how the Council sees the Moray LDP area developing over the next 10 years and beyond and covers the administrative area of Moray Council minus the southern area which falls within the Cairngorms National Park which prepares its own LDP. The Moray Local Development Plan 2020 replaces the Moray Local Development Plan 2015.

6.8.5 The 2020 Moray Local Development Plan (MLDP) has three main areas of interest. These are;

- Placemaking;
- Sustainable Economic Growth; and
- Infrastructure Services.

6.8.6 Within the section of the MLDP that relates to infrastructure services, generating electricity from renewable sources and addressing climate change is outlined as a key objective.

6.8.7 While there are policies that relate to Renewable Energy Projects within the MLPD, there are no specific policies on the development of connective electricity infrastructure for such projects. However, there are several policies that are relevant or are on the protection of the natural environment that may also be relevant in the consideration of such infrastructure. These include:

- MLDP - Policy PP1: Placemaking;
- MLDP - Policy PP3: Infrastructure and Services;
- MLDP – Policy DP1: Development Principles
- MLDP - Policy EP1: Natural Heritage Designations;
- MLDP - Policy EP2: Biodiversity;
- MLDP - Policy EP3: Special Landscape Areas and Landscape Character;
- MLDP - Policy EP4: Countryside Around Towns;
- MLDP - Policy EP5: Open Space;
- MLDP - Policy EP7: Forestry, Woodlands and Trees;
- MLDP - Policy EP8: Historic Environment;
- MLDP - Policy EP10: Listed Buildings;
- MLDP - Policy EP11: Battlefields, Gardens and Designated Landscapes;
- MLDP - Policy EP12: Management and Enhancement of the Water Environment
- MLDP - Policy EP14: Pollution, Contamination and Hazards; and
- MLDP - Policy EP16: Geodiversity and Soil Resources.

[31] Moray Council, Moray Local Plan 2020. *Vision, Spatial Strategy, Housing, Infrastructure, and Employment Land Requirements, Policies and Parking Standards.* 2020

Current Applications

6.8.8 Potential windfarm locations within the vicinity of the Preferred Route include Rothes III Wind Farm (Application Stage) and Bodinfinnoch (Scoping) in the eastern part of the corridor. Also at the scoping stage, is the seven turbine extension to the operational Edintore Wind Farm in Cairds Wood to the west of Blackhillock Substation.

6.8.9 To the north of the proposed Rothes III Wind Farm on-site substation, an application was made in May 2021, relating to the formation of a new forestry road at Bruach Hill in Rothes Forest, 3 km west of Rothes. This new forestry road proposal lies close to the start of the Proposed Route, though is not considered likely to be affected by a new OHL.

6.8.10 Within Rothes, along Green Street, an application for the change of use of amenity grounds to garden grounds was made in May 2021. Also, within Rothes, there is a screening application for a pot ale processing facility on North Street. To the north of Rothes on the land between the B9015, the town and the River Spey, there is an application for a proposed 100,000 tonnes per annum malt production facility.

6.8.11 There are also various applications in place for Blackhillock substation, though these are not considered likely to be affected by a new connection coming into the substation.

Consented Development

6.8.12 Within Rothes, there are numerous consented domestic developments, as well as, a consent to upgrade the existing effluent treatment plant at the Waste Water Treatment Works on Green Street to the north of Rothes.

6.8.13 Also, particularly relevant, are the housing allocations on the outskirts of Rothes, which could see the urban edge of the settlement expand. It is important to note though that these allocations are for a very small number of dwellings and as such any negative impacts could likely be avoided through careful design and siting.

6.8.14 At Boat o' Brig Railway Viaduct, scour protection works were consented in March 2020, while proposed repairs at Boat o' Brig Railway Viaduct are still awaiting consent.

6.8.15 At Craighead, on approach to Mulben there are multiple consented developments in place that may fall within the Proposed Route's potential alignments. These include;

- Earthwork improvements, crest drainage and fencing upgrades on the Railway Line at Craighead northwest of Mulben;
- Repair and renewal of the retaining wall on the Burn of Mulben at Craighead northwest of Mulben;
- The installation of an ecological treatment system hardstanding and access track improvements on land at Craighead northwest of Mulben;

6.8.16 To the north of Mulben, as part of the Malcolmburn Bond Warehouses, consent is in place for the erection of four storage containers though this is not considered likely to be affected by a new OHL.

6.8.17 To the east of Mulben there is consent for a proposed dwelling house on a site at Wester Garland.

6.8.18 A proposal to develop a hard rock quarry and mineral processing area and formation of screening bunds along the northern boundary of Rosarie Quarry which lies along the A95 to the east of Rosarie was consented in December 2019.

6.8.19 There are numerous small domestic consents along the Proposed Route, however it is assumed that any potential impacts on these could be mitigated through careful sighting and design. To the east of Rosarie, where the Proposed Route turns southeast towards Blackhillock Substation, a domestic garage has been consented at Taigh Sa Choille Maisley, Keith, in September 2019.

7. COMPARATIVE APPRAISAL

7.1.1 This section provides a summary of the potential environmental, technical and economic effects identified for each alignment option following the topic areas shown in **Table 3.1**. Reference should also be made to **Figures 3 to 10** which illustrate potential environmental baseline constraints identified under each topic.

7.2 Environmental Topic Areas

Natural Heritage

Designations

7.2.1 The Preferred Alignment crosses the SSSI and SAC once as OHL to the south of Boat o' Brig prior to reaching Auchroisk Distillery. Subject to appropriate control measures and good practice it is unlikely that works associated with construction would impair water quality and compromise the qualifying interests of the adjacent River Spey SSSI and SAC.

7.2.2 By traveling further south than the Preferred Alignment, through the town of Rothes, Alignment Variant P1 crosses the River Spey's main channel, which is designated as a SSSI and SAC only once. However, it runs along the southern bank of the river to the south of Dundurcas Farm within the catchment of the SSSI and SAC southwest of Boat o' Brig. Alignment Variant P1 also runs parallel to the River Spey's outreaching SAC within the town of Rothes. When compared to the Preferred Alignment, Alignment Variant P1 has significant interaction with the SSSI and SAC making it less preferable.

7.2.3 Alignment Variant P2 crosses the River Spey SAC at an additional location on Back Burn downstream of the Speyburn distillery. As detailed in Section 5, Alignment Variant P3 would see two additional crossings of the River Spey and thus the SSSI and SAC as HDD/Cable. Alignment Variant P4 lies to the north of the prominent meander in the river to the east of Rothes and would run alongside the SSSI and SAC for approximately 1.2 km. A cable route at this location could, in the longer term, be prone to erosion from the River Spey. Thus, the Preferred Alignment is preferable to Alignment Variant P2, P3 and P4 as it minimises interaction with the SSSI and the SAC.

7.2.4 Alternative Alignment A increases the interaction with the SSSI and SAC more than the other alignment options. It includes two additional OHL watercourse crossings of the River Spey SSSI and SAC compared to the Preferred Alignment. Further interaction with the designations relates to Alignment Variant P5 near Boat o' Brig where it would cross the SAC again on its eastern reaching branch on the Burn of Mulben. The Preferred Alignment would not require this additional crossing of the SAC.

7.2.5 In order to reduce the number of crossings of the River Spey SSSI and SAC, while not incurring other additional crossings, the Preferred Alignment would be preferable.

Protected Species

7.2.6 Within the study area, there is abundant woodland, and woodland edge habitat, which could provide suitable habitat for badger, red squirrel, pine marten and bat species. Riparian zones could provide suitable habitat for otter. Initial results from surveys in 2021 highlight the presence of badger near Blackhill Wood, Hillockhead, Burghnamary, Back Burn and Dounie. Signs of pine marten were observed in plantation and semi-natural woodlands. Red squirrel signs were also observed in patches of Scot's pine woodland throughout the areas around the alignments.

7.2.7 Protected species constraints are considered to be broadly equivalent for all options with marginal differences in proximity to recorded species signs. However, Alignment Variant P6 would cut through more native woodland than the Preferred Alignment would to the southwest and south of Auchroisk Distillery, and this could

increase the probability of encountering protected species. Conversely, as Alignment Variant P7 remains south of the railway and stays clear of woodland edges for a longer distance it reduces the probability of encountering protected species.

7.2.8 Alternate Alignment A would cross the Burn of Mulben further west and run alongside the Burn of Mulben and associated riparian habitat. This is likely to encroach on native woodland and increase the probability of encountering protected species. East of Rosarie Alternate Alignment A would cut through more of the Wood of Maisely than the Preferred Alignment would, and therefore potentially have more chance to impact upon protected species. Meanwhile, as Alignment Variant A1 stays north of the A95 for longer, crosses the Burn of Mulben nearer Keith and stays clear of woodland edges for a longer distance it reduces probability of encountering protected species.

7.2.9 Subject to careful micro-siting of poles and management of construction activities to avoid key habitats and sensitive sites, effects on protected species should be suitably controlled. As such, protected species should not present a constraint for the Preferred Alignment. The Preferred Alignment is generally preferred and Alignment Variant P6, and Alternate Alignment A are less preferred. Alignment Variant P7 and the sections of Alignment Variant A1 surrounding the A95 and the Burn of Mulben near Keith may reduce the probability of encountering protected species very slightly. However, these are only very minor differences.

Habitats

7.2.10 A broad overview of sensitive habitats was obtained during initial walkover surveys. In relation to the Preferred Alignment, small areas of GWDTE are present within areas of farmland west of the A941 public road and along the upper Burn of Mulben, north of the A95 public road. The sensitive habitats identified including Sourden Wood present modest constraints which could be further reduced or eliminated by micro-siting infrastructure and/or adopting appropriate mitigation. There is therefore considered to be low potential for the Preferred Alignment to be constrained by habitats.

7.2.11 Alignment Variant P1 would cross some native woodland as an OHL to the southwest of Rothes and the southern bank of the River Spey to the east of the river's prominent northern meander that the Preferred Alignment avoids. Alignment Variant P1 does however avoid crossing the A941 via passing through woodland habitat.

7.2.12 Alignment Variants P3 and P4 would reduce impacts within woodland area at Sourden Woods in comparison to the Preferred Alignment, as they would avoid running through it.

7.2.13 Alignment Variant P5 will likely impact a greater area of woodland habitat as it runs along the Burn of Mulben. Alignment Variant P6 would cut through more native woodland than the Preferred Alignment would southwest and south of Auchroisk Distillery. Avoidance of these woodland habitats is preferable.

7.2.14 To the east of Rosarie, Alternate Alignment A would cut through more the Wood of Maisely and therefore have more chance to impact upon habitats.

7.2.15 All other alignment options are considered to be broadly equivalent to the Preferred Alignment in terms of habitat constraints. Generally, the Preferred Alignment would have minimal constraints in relation to this topic. However, Alignment Variant P3 and P4 could see some impacts on habitats reduced in the areas around Sourden Woods in comparison to the Preferred Alignment. While Alignment Variant P5 and Alignment Variant P6 and Alternate Alignment A could see increased impacts on habitats compared to the Preferred Alignment. Alignment Variant P1 avoids passing through woodland habitat before crossing the A941, but it introduces additional habitat crossings around the southern bank of the River Spey that the Preferred Alignment does not.

Ornithology

7.2.16 All alignment options could potentially result in the loss of small areas of woodland and scrub habitat which supports breeding bird species. Woodland and scrub habitat is abundant in the local and wider area. Wetland areas (as identified in the Habitat section) provide habitats of value to breeding waders and wildfowl. The area also comprises open field systems, which may be of value to foraging waders and wildfowl.

7.2.17 A known Osprey nest is located circa 1 km from the Preferred Alignment. Given the River Spey offers potential foraging habitat for Osprey, potential impacts that may arise from increased collision risk with overhead line infrastructure will be much reduced with Alignment Variants P1, P3 and P4 as they are UGC or partly UGC, within the vicinity of the River Spey.

7.2.18 Based on initial results from 2021 breeding bird surveys it is considered that there will be moderate constraints, given the types of habitats and bird species anticipated to be present within the wider area for all alignment options, albeit UGC variants within the vicinity of the River Spey offer opportunities to reduce the potential effects associated with OHL infrastructure.

Geology, Hydrology and Hydrogeology

7.2.19 Published priority peatland mapping suggests that the Preferred Alignment is generally absent of peatland although a small, isolated area of Class 1 peatland habitat is recorded in the headwater catchments of the Burn of Rothes within the western extent of the Preferred Alignment within a larger area of Class 5 peatland. Alignment Variant P1 would avoid crossing this area of peat. Another isolated area of Class 5 peatland is recorded along Loan Burn, to the south of Hill of Mulderie. Alignment Variant P7 crosses an additional unit of potential Class 5 peatland where it crosses the Burn of Mulben and railway line prior to re-joining the Preferred Alignment. Alignment Variant P5 would also cross an area of peat recorded within the Moss of Croichnacroy, near Craighead.

Superficial geology mapping shows that virtually all of the Preferred Alignment is underlain by Glacial Till and alluvium and/or glacio-fluvial sand and gravel is shown to overlie the till adjacent to larger watercourses.

7.2.20 SEPA floodplain mapping shows that the Medium (0.5% annual exceedance probability of flooding / 1 in 200yr) likelihood of flooding floodplain extent is crossed by the Preferred Alignment at many points. Whilst not a development constraint, due regard will need to be made to flood risk during the design, construction and operational phase of this alignment. Particular attention will be required at proposed watercourse crossings, where floodplains will also be crossed. Rothes lies within an area identified as at risk of flooding (potential vulnerable area - PVA: 02/05/09) and several features are present associated with the local flood alleviation scheme (defence schemes 65 and 104) on the Burn of Rothes.

7.2.21 There are many private water supplies (PWS), generally associated with springs and shallow groundwater, registered within catchments downgradient of the variants. The PWS could be prone to pollution without appropriate control, however with appropriate design and mitigation these should not pose a development constraint.

7.2.22 The River Spey, downstream of Craigellachie, is designated as a surface water Drinking Water Protection Area (DWPA) that serves the water treatment works (WTW) at Badentinan. Groundwater is abstracted from shallow wellfields adjacent to the River Spey between the towns of Inchberry and Mosstodloch, approximately 5 km to the north of the closest point of this alignment. The wellfield is likely to be in hydraulic continuity with the River Spey and will therefore, be vulnerable to pollution. The Preferred Alignment crosses the River Spey DWPA for approximately 5.2 km. A second DWPA is designated for the River Isla upgradient of its confluence with the Burn of Haughs at Keith. The Preferred Alignment crosses the lower section of the River Isla DWPA for approximately 2.5 km. All alignment variants are considered comparable in terms potential impacts on the

DWPAs. Subject to best practice construction techniques that safeguard water quality, the River Spey and Isla DWPAs are not considered a development constraint.

7.2.23 The western extent of the Preferred Alignment crosses numerous watercourses with steep surface gradients in their catchment that can result in potential rapid mobilisation of suspended solids and pollutants during construction without appropriate controls. Alignment Variant P1 would avoid crossing several of the larger watercourses with steep surface gradients in their catchment to the west and north of Rothes (Black Burn, Broad Burn and Burn of Sourden). As HDD/Cable, Alignment Variant P1 would pass under Sandyhill Burn. Then, as an OHL and running along the southern bank of the River Spey, it would cross Rocky Burn and Allt Daley, before re-joining the Preferred Alignment to the south of Bridgeton Mains. Where the HDD/Cable transitions to the OHL along the banks of the River Spey, superficial cover is recorded as gravel, sand, silt and clay deposits. It is noted that the HDD/Cable, west of the River Spey, is within alluvium of gravel, sand, silt and clay. Shallow groundwater is likely to be present in the superficial deposits which, without appropriate control, could be vulnerable to pollution. Overall, Alignment Variant P1 is therefore less preferable to the Preferred Alignment despite avoiding area of Class 1 peat.

7.2.24 Alignment Variant P2 crosses Broad Burn further downstream than the Preferred Alignment would, where the valley sides are significantly less steep, reducing the associated hazards. This also removes several crossings of the Small Burn and reduces the need for forestry felling locally, and therefore potential effects on hydrology and hydrogeology as a result of felling. Alignment Variant P2 may therefore offer some advantage to the Preferred Alignment in terms of geology, hydrology and hydrogeology.

7.2.25 Alignment Variants P3 and P4 interact with the prominent northern meander in the River Spey that lies east of Rothes much more so than the Preferred Alignment does. In relation to Alignment Variant P3, it is noted that the HDD/Cable between the B9015 and the track to Lower Aikenway (approximately 1 km) is within alluvium of gravel, sand, silt and clay, which is likely to contain shallow groundwater and could be prone to pollution without appropriate control. Much of the HDD/Cable between the B9015 to where it re-joins the Preferred Alignment is within the floodplain shown by SEPA mapping. Alignment Variant P4 runs adjacent and parallel to the River Spey SSSI and SAC for approximately 1 km on the outside edge of a meander. Subject to control measures and good practice it is unlikely that works associated with construction would impair water quality and compromise the qualifying interests of the adjacent River Spey SSSI and SAC.

7.2.26 Alignment Variant P5 crosses the River Spey downstream of the Preferred Alignment near Boat o' Brig, with similar flood extents as that of the Preferred Alignment. The flood extents for the Burn of Mulben that the OHL would cross are confined by the steep, incised valley and not considered a development constraint. However, the OHL would also cross the flood extents mapped at the confluence of the Burn of Mulben and Allt Tersie. Given the added peat constraints, Alignment Variant P5 is more complex and less preferable in terms of geology, hydrology and hydrogeology.

7.2.27 Alignment Variant P6 would require a significant increase of forestry felling when crossing the Woods of Knockmore. This could increase potential effects on hydrology and hydrogeology as a result of felling, making it less preferable to the Preferred Alignment for this topic.

7.2.28 As previously mentioned, Alignment Variant P7 crosses an additional unit of potential Class 5 peatland. It also crosses the Burn of Mulben further upstream compared to the Preferred Alignment. It avoids crossing the mapped flood extents of the Burn of Mulben, however, it introduces crossing the broad mapped floodplains at the confluence of Burn of Auchinkart and Crowrie Stripe. Subject to controls, this alignment is not considered to pose a significant hydrology / geology development constraint, however, it may be less preferable to the Preferred Alignment overall for this topic.

7.2.29 Alignment Variant P8 passes three PWS records for Shandston Mulben for spring abstractions. One further PWS record for The Tam for their borehole abstraction lies approximately 120 m to the south and downgradient

of the OHL. Forestry felling upgradient of both PWS abstraction areas will be necessary for the variant. Subject to controls, this alignment is not considered to pose a significant hydrology / geology development constraint.

7.2.30 The OHL of Alternate Alignment A between the B9015 and Aikenway, and the second and third crossings of the River Spey lie within alluvium of gravel, sand, silt and clay, which are likely to contain shallow groundwater and could be prone to pollution without appropriate control. The OHL crosses peat recorded within the Moss of Croichnacroy near Craighead. North of the Burn of Mulben it will involve further need for felling along the Burn of Mulben. Further forestry felling will also be necessary within the Wood of Maisley, increasing potential effects on hydrology and hydrogeology as a result of felling. Alignment Variant A crosses the broad flood extents associated with the River Spey at three locations between Rothes and Boat o' Brig. The OHL also crosses the wider flood extents mapped at the confluence of the Burn of Mulben and Allt Tersie.

7.2.31 Alignment Variant A1 crosses the mapped flood extents of the field drains between the Hill of Mulderie and Hill of Towie downstream and avoids crossing the Burn of Rosarie and its mapped floodplains. The variant avoids crossing upstream of the PWS abstraction at Rosarie, however the PWS at Tor Croft and Bonrov House is introduced as potentially at risk.

7.2.32 Considering the above, the preference from a soils and hydrology perspective would be the Preferred Alignment, with Alignment Variant P2 offering opportunities to reduce constraints around Rothes. Alignment Variant P6 and Alignment Variant P7 are the least preferred options for this topic area.

Cultural Heritage

7.2.33 Sites of cultural heritage significance are shown on **Figure 5**.

Cultural Heritage Designations

7.2.34 There are no designated sites within 50 m of the Preferred Alignment, so potential impacts of all alignment options would be limited to indirect visual impact. There are however five designated heritage assets within the 1 km corridor of the Preferred Alignment. One, the eighteenth-century remains of Dundurcas church and graveyard (SM 5621), is believed to overlie earlier medieval remains, near Kirkhill Farm and is a Scheduled Monument of High sensitivity. Three are Category B Listed Buildings of Medium sensitivity. These include the mid-nineteenth century Mulben Mill (LB 2319) and Mulben Station (LB 2321), and the late-nineteenth century Speyburn Distillery (LB 18852). The final one is a Category C Listed Building of Low sensitivity: the mid-nineteenth century Miller's Cottage (LB 2320) at Mulben Mill.

7.2.35 Alternative Alignment A and Alignment Variant P1 would not travel within 1 km of Dundurcas church and graveyard (SM 5621). However, Alignment Variant P1 does travel directly through the town of Rothes where it comes within approximately 500 m of the Castle on the western side of town which is a Scheduled Monument. By cutting through the town, this variant would also pass numerous listed buildings, although as a HDD/Cable no setting impacts are anticipated.

7.2.36 Although there are no cultural heritage designations within 50 m of Alignment Variant P5, it diverges from the Preferred Alignment to the south-east of Dundurcas church and graveyard (SM 5621). There is potential for an adverse impact on its setting arising from the introduction of a new OHL in the view to the south-east.

7.2.37 All other options are considered to be broadly equivalent to the Preferred Alignment. Overall, Alignment Variant P7 is slightly less preferred. Alternative Alignment A and Alignment Variant P1 would avoid Dundurcas church and graveyard (SM 5621) which may be preferable. However, Alignment Variant P1 would travel through Rothes, though this would be as UGC, therefore no setting impacts are anticipated, so it may still be preferable.

Cultural Heritage Assets

7.2.38 There are 81 non-designated cultural heritage assets recorded on the HER within the 1 km corridor of the Preferred Alignment, and a further 20 features were identified during the desktop study of historic mapping and aerial photography. The extent and sensitivity of these heritage assets in relation to the likely construction footprint of the alignment mean that few of the cultural heritage remains present are likely to be at risk of disturbance, and, subject to appropriate mitigation, no significant direct impacts are anticipated.

7.2.39 The Preferred Alignment passes to the north of Rothes, while Alignment Variant P1 goes directly through it. HER entry NJ24NE0083 records the extent of the historic core of Rothes village, founded as a crofting township in 1766 and considered to be of medium sensitivity. Alignment Variant P2 also travels closer to the town of Rothes HER entry NJ24NE0083 than the Preferred Alignment does. Alignment Variant P3, Alignment Variant P4 and Alignment Variant P5 diverge from the Preferred Alignment and travel near to the town of Rothes HER entry NJ24NE0083 but are comparable to the Preferred Alignment in this.

7.2.40 In relation to Alignment Variant P2, the extent and sensitivity of NJ25SE0040 (Greens of Rothes) and the likely construction footprint means there is a low risk of disturbance, and, subject to appropriate mitigation, no significant direct impacts are anticipated.

7.2.41 Elsewhere, as with the Preferred Alignment, all alignment variants, may interact with NJ35SE0004, which is recorded on the HER as a group of structures associated with the Category B Listed Mulben Mill (LB2319) and the Category C Listed Miller's Cottage (LB2320). The HER entry records several dams, sluices, weirs and a mill lade, as well as a farmsteading and garden enclosure. Although undesignated, NJ35SE0004, the Mains of Mulben Farmstead/mill should be considered of medium sensitivity due to its relationship to the Listed mill complex.

7.2.42 Two heritage assets within 50 m of Alternative Alignment A (one is also within 50 m of Alignment Variant A1) relate to the sites of features recorded on historic mapping that have since been destroyed or otherwise removed by archaeological excavation during other construction works. Both are considered to be of negligible sensitivity.

7.2.43 Other features identified along the alignment variants include farmsteads, buildings and enclosures, a shepherd's cairn, sheepfolds, livestock shelters, boundary stones, a mill lade, sluice and dam, sand and gravel extraction pits and two sections of the former Great North of Scotland railway line. All of these are considered to be of low sensitivity and there is no preference for any one alignment variant over the Preferred Alignment.

7.2.44 Generally, all alignment variants are considered to be broadly equivalent to the Preferred Alignment in terms of potential to be constrained by non-designated cultural heritage assets. However, Alignment Variant P1 and P2 are slightly less preferable, as they run through or closer to the town of Rothes which is HER entry NJ24NE0083. It should be relatively straightforward to mitigate any potential direct impacts associated with the Preferred Alignment through design and the use of micrositing to avoid structural remains of former buildings and other standing structures. Where it is not possible to avoid direct impacts upon heritage assets through micrositing, impacts can be reduced through adoption of sensitive construction techniques, such as the use of low ground pressure vehicles and the sensitive routing of temporary access tracks. A focussed programme of supporting archaeological work, such as topographic survey and recording, will help to further mitigate any potential impacts.

People

Proximity to Dwellings

7.2.45 There are numerous dwellings and buildings located within the Proposed Route, as shown on **Figure 6**. Buffers of 100 m have been placed on all built structures identified, however only those identified as residential dwellings are considered to pose constraints under this topic. For the alignment options that are a mix of OHL and UGC, the UGC sections are not assessed.

7.2.46 To the north of Rothes, as the Preferred Alignment crosses the A941 to circle around the northern edge of the settlement to Auchinroaths and then travel back down, southeast past Speyburn Distillery it passes close to but not within 100 m of multiple properties. Variant P2 passes close to a similar number of properties as the Preferred Alignment here, though it does come to the edge of the 100 m buffer of approximately four making it slightly less preferable. Variant P1 would avoid this cluster of properties as it travels to the southwest of Rothes and passes through it as UGC. As the Preferred Alignment would then pass-through woodland the potential impacts on properties would be reduced in comparison to some of the other alignment options. To the east of the River Spey's northern meander to the east of Rothes, the Preferred Alignment would pass close to a cluster of properties and come within under 100 m of properties near Dundurcas Farm and Kirkhill Farm. The alignments of Alternative Alignment A and Alignment Variant P1 would miss this cluster altogether though, so may be preferable at this location.

7.2.47 To the southwest of Auchroisk Distillery there are also properties that the Preferred Alignment comes to within almost 100 m of, though it never breaches the 100 m buffers. Alignment Variant P5 is less preferred in comparison to the Preferred Alignment in terms of proximity to dwellings as it comes nearer to a number of properties and within 100 m of two at Collie Farm. Continuing then as Alternative Alignment A, this option is marginally preferable in terms of proximity to dwellings to the Preferred Alignment around Boat o' Brig and Auchroisk Distillery. However Alternative Alignment A passes within the 100 m buffer of a property northeast of the distillery, though this could be overcome by careful micrositing. Alignment Variant P6 to the south of Auchroisk Distillery and Alternative Alignment A to the north of Auchroisk Distillery remain the furthest from properties through this section of the route.

7.2.48 Several properties are clustered around both Mulben and Rosarie, though the Preferred Alignment and Alignment Variant P7 stay over 100 m away from them. Alignment Variant P8 comes close but not within 100 m of the property at The Tam on Gallow Hill, whereas the Preferred Alignment remains approximately 250 m away. Alignment Variant A1 would pass closer, though not within 100 m, of properties at Rosarie than Alternative Alignment A would. However, these are minor differences and they would be unlikely to have a significant difference in overall effects on dwellings.

7.2.49 The Preferred Alignment also passes within 200 m of properties to the southwest of Keith on its approach to Blackhillock Substation. Alternative Alignment A passes marginally closer to the properties just south of Hillockhead Wood, though no significant differences would be anticipated.

7.2.50 All alignment variants are considered to be broadly comparable with the Preferred Alignment, though with a marginal preference for Alignment Variant P1 around Rothes as it does not pass through the cluster of dwellings to the north of the town. Alignment Variant P1 or Alternative A would also avoid the cluster of properties near Kirkhill Farm, therefore Alignment Variant P1 is generally the most preferable for the western stages of the route. Towards the east, Alternative Alignment A or Alignment Variant P6 are also marginally preferable to the Preferred Alignment around Boat o' Brig and Auchroisk Distillery, with Alignment Variant P5 the least preferable of the alignment options for proximity to dwellings.

Landscape and Visual

Designations

7.2.51 All of the alignment options would run through the River Spey SLA. The Preferred Alignment passes through the Spey Valley SLA for approximately 6.9 km. There is some potential for the some of the special qualities of the SLA to be affected by the alignment. However, careful siting of wood poles, minimising felling and consolidation of distribution OHL's already present in the area will help to reduce potential effects.

7.2.52 The alignment variations would be associated with broadly similar effects on the SLA as Preferred Alignment, but with the following differences:

- Alignment Variant P3: As with the Preferred Alignment with reduced felling within Sourden Woods as the variant would take the form of an underground cable for approximately 1.7 km from Dundurcas Farm westward, passing underneath the Spey. An underground cable through this section would reduce the potential for effects on the special qualities of this part of the SLA.
- Alignment Variant P4: As with the Preferred Alignment with reduced felling within Sourden Woods as the variant would largely take the form of an OHL across farmland and an underground cable curving around the prominent northern bend in the River Spey before continuing to Dundurcas Farm. The variant may somewhat reduce the potential for effects on the special qualities of the SLA at this pinch point along the main route through it.
- Alignment Variant A and A1: As with the Preferred Alignment although the variation would take a more direct route through the SLA, crossing the Spey three times. This would increase potential to disrupt key views of and along the river that are an important part of the special qualities of the SLA.

7.2.53 Overall, a combination of the Preferred Alignment with the Alignment Variant P3 undergrounded in sections under the River Spey, would be the preference in terms of potential effects on the Spey Valley SLA.

Landscape Character

7.2.54 All of the alignment options run through four LCTs: LCT 287: Broad Farmed Valley, LCT 288: Upland Farmland, LCT 290: Upland Moorland and Forestry and LCT 292: Open Upland. Alternative P7 briefly also passes through LCT 289: Upland Farmed Valleys.

7.2.55 The western part of the Preferred Alignment passes through an upland area of commercial forest. Some removal of trees is likely to be required, although it is anticipated this will be kept to a minimum through careful micro siting. The alignment then passes through the sensitive Broad Farmed Valley LCA passing around the northern edge of Rothes before cutting through Sourden Wood and then crossing the main floodplain of the River Spey. This part of the LCT sits within the Spey Valley SLA designation. The Preferred Alignment briefly enters the Open Upland LCT to the south of Auchroisk Distillery. It then follows along the A95 through the Upland Farmland LCA before it turns south-eastward through rolling farmland. The final section of the Preferred Alignment would take the form of an underground cable which would help to reduce potential effects associated with a busy wirescape on the approach to Blackhillock substation.

7.2.56 Broadly speaking there is potential for these landscapes to accommodate an alignment assuming appropriate micro siting that minimise felling, particularly given the mix of wooded areas and the presence of other vertical features which reduce sensitivity to change, such as existing overhead lines (OHLs) and wind turbines within these LCTs and/or in adjacent areas. Where possible this alignment would cluster the OHL with existing infrastructure development (road, rail and OHL) and therefore is not anticipated to represent a significant new feature within the landscape. However, consolidation of the OHL structures where appropriate would also be recommend to reduce the potential for landscape effects (i.e. undergrounding the existing distribution OHLs) where multiple OHLs would otherwise be experienced in combination, particularly within the River Spey floodplain. This would reduce the prominence of OHLs within the landscape and potential for cumulative effects resulting from the introduction of the alignment.

7.2.57 The alignment variations would be associated with broadly similar landscape effects as the Preferred Alignment, but with the following differences:

- Alignment Variant P3: As with the Preferred Alignment with somewhat reduced potential to affect the character of the River Spey floodplain due to the undergrounding of the variant and decreased felling requirements.

- Alignment Variant 4: As with the Preferred Alignment with somewhat reduced potential to affect the character of the River Spey floodplain due to the undergrounding of the variant and decreased felling requirements.
- Alignment Variant P6: As with the Preferred Alignment with a slight increase in the extent of the alignment within LCT 292 on the slopes of Ben Aigan. As this would require additional felling this would increase the potential for effects on the character of this LCT.
- Alignment Variant P7: As with the Preferred Alignment with the addition of a small section of the alignment passing through LCT 289: Upland Farmed Valleys. However as this would be on the transitional edge of the LCT it is unlikely to result in any changes to the wider characteristics of the LCT.
- Alignment Variant A and A1: As with the Preferred Alignment with potential for increased effect on the landscape character of the River Spey floodplain due to the additional aboveground river crossings.

7.2.58 Overall, a combination of the Preferred Alignment with the Alignment Variant P3 undergrounded in sections under the River Spey, would be the preference in landscape character terms.

Visual

7.2.59 From its western end, the Preferred Alignment would largely be screened from visual receptors as it passes through an area of commercial forestry. However, it would cross the core path (SP01) that runs alongside the Burn of Rothes and there is potential for visual effects on this route. As the route descends towards Rothes, there is potential for visual effects on receptors in nearby properties. Where the Preferred Alignment crosses the A941, there would be a localised effect on the route, whereby an OHL would be introduced into an elevated open area that does not currently feature other OHLs. As the Preferred Alignment continues across Broad Burn and circles around the forestry there is potential for visual effects for receptors in nearby properties before the Preferred Alignment enters the Sourden Woods where it would largely be screened from view before emerging to the west of Newlands to cross the B9015. As the Preferred Alignment crosses the floodplain of the River Spey it would be seen across this open landscape from a variety of visual receptors including properties, road routes and recreational routes including the Speyside Way long distance walking route. It would also be seen in the context of the existing distribution OHLs that run though the area.

7.2.60 To the east of Bridgeton the Preferred Alignment would cut through a small section of forestry and then hug the forest edge as it passes to the south of the Auchroisk Distillery before again entering an area of forestry where it would be screened from view. Through this stretch of the Preferred Alignment the OHL would either be screened by forestry or seen back-clothed against forestry reducing potential visual effects. The alignment would then cross the B9103 near Craighead where it would rise up and cross the railway gaining elevation as it passes around the Mains of Mulben before turning south-eastward towards Garland. There is potential for visual effects from receptors at Mulben and the surrounding properties, however the OHL would largely avoid the main residential clusters in this area and would be seen in the context of the existing wind turbines. The Preferred Alignment would continue eastward crossing the railway and A95 to the east of the Glentauchers Distillery. It would continue eastward to the south of the A95 hugging the edge of the forestry against which it would be back-clothed in views from the road. It would then cross into an area of open rolling farmland where there would be potential for visual effects from receptors at nearby properties and the B9014. The westernmost stretch of the Preferred Alignment as it approaches Blackhillock substation would take the form of an underground cable which would help to reduce the potential visual effects associated with the potential cumulative effects of the wirescape around the substation.

7.2.61 The Alignment Variants would be associated with broadly similar visual effects as the Preferred Alignment, but with the following differences:

- Alignment Variant P1: As with the Preferred Alignment. Although it would cross the core paths to the west of Rothes (SP01 and SP12) two additional times. Once the alignment approached Rothes it would move to and underground cable, minimising potential visual impacts. There would be some potential for additional visual impacts associated with felling on the lower slopes of Ben Aigan which would be seen from receptors at properties within the Spey floodplain and the B9015.
- Alignment Variant P2: As with the Preferred Alignment however with some additional potential visual effects for receptors in houses at Drumbain and around the Speyburn Distillery where the alignment would require felling of mature vegetation that screens properties.
- Alignment Variant P3: As with the Preferred Alignment, however with potential to somewhat reduced visual effects on receptors travelling along the B9015 to the west of Dundurcas Farm.
- Alignment Variant P4: As with the Preferred Alignment, however with potential to somewhat reduced visual effects on receptors travelling along the B9015 to the west of Dundurcas Farm at the pinchpoint between the river, road and forestry.
- Alignment Variant P5: As with the Preferred Alignment, with potential increased visual effects along the B9103 around Boat o' Brig where the variant would run parallel. Although the woodland to the north of Auchroisk Distillery would provide screening of the variant from the south, there would be potential for increased visual effects on receptors at properties to the north.
- Alignment Variant P6: As with the Preferred Alignment, with a slight decrease in potential effects on visual receptors on the B9103 around Auchroisk Distillery.
- Alignment Variant P7: As with the Preferred Alignment, with potential for increased visual impacts from receptors around Mulben. The alignment would pass in close proximity to additional properties and would overlook the settlement and surrounding farms potentially becoming a prominent feature locally.
- Alignment Variant A: As with the Preferred Alignment, with potential for increased visual effect on receptors in and around the River Spey floodplain due to the additional river crossings. This would be particularly noticeable around Aikenway and the castle remains that sit within the river bend. Similarly to Alignment P5, this variant would also potentially increase visual effects on receptors north of the Burn of Mulben while benefiting from screening when seen from the south near Auchroisk Distillery.
- Alignment Variant A1: As with the Alignment A, with potential for increased visual effects on receptors north of the A95 between Garland and Hillockhead where the variant would cross more open ground closer to properties without the benefit of being back-clothed and partially screened by existing woodland.

7.2.62 Overall, either the Preferred Alignment or a combination of the Preferred Alignment with the Alignment Variant P3 undergrounded sections under the River Spey, would be the preference in terms of potential visual effects.

Land Use

Agriculture

7.2.63 The Preferred Alignment originates in an area classified as Class 5.2 agricultural land. Passing to the west side of Rothes, it then travels through some Class 4.1 land for approximately 2 km. Alignment Variant P2 is less preferable here in terms of agriculture, as it curves south, closer to the northern edge of Rothes and passes into Class 3.1 land for almost its entire length of over 1 km.

7.2.64 After curving back around near the properties at Smallburn, the Preferred Alignment travels into the Class 3.1 land as it turns to travel southeast near the Speyside Distillery to the northeast of Rothes. The Preferred

Alignment would then move east into lower agriculture value Class 5.2 land for approximately 1.5 km rather than moving into higher agriculture value Class 3.1 land as with Alternative Alignment A, Alignment Variant P3 or Alignment Variant P5. Although the Preferred Alignment does enter the Class 3.1 land as it moves southeast to approach Dundurcas Farm, it is slightly preferable in this area in terms of agriculture as a topic consideration.

7.2.65 Rather than travel north then northeast of Rothes, Alignment Variant P1 would diverge from the Preferred Alignment in Class 5.2 land before moving into Class 3.1 land southwest of Rothes. As it moves through Rothes there is no agricultural classification for the land as this is in an urban area. It would then move back into Class 3.1 land where it would remain as it passes along the southern bank of the River Spey before moving into Class 4.2 to the south of Boat o' Brig. This variant would travel for longer in Class 3.1 areas around Rothes and the River Spey than the Preferred Alignment, making it slightly less preferable for this topic.

7.2.66 The Preferred Alignment passes into Class 4.2 land to the south of Boat o' Brig. Alignment Variant P5 would stay in higher agriculture value Class 3.1 land for longer than the Preferred Alignment making it less preferable in terms of agriculture.

7.2.67 Around Mulben the Preferred Alignment passes into Class 3.2 land. To the northeast of Mulben, Alignment Variant P8 would leave the Class 3.2 land and briefly pass through a small area Class 5.2 land around Gallows Hill. However, there would be little difference in terms notable of agricultural benefits.

7.2.68 From Rosarie to Blackhillock substation the land is mostly Class 4.2, although there is some Class 3.2 land around Hillockhead Wood. All alignment options are considered to be broadly similar through these sections of the route. Though Alignment Variant A1 would stay in higher agriculture value Class 3.2 land for longer than the Preferred Alignment.

7.2.69 Overall, the Preferred Alignment is generally the preferred option or considered to be broadly similar in the level of potential effect on agricultural land as the other variants. Alignment Variant P5 is the least preferable in terms of agriculture.

Forestry

7.2.70 The Preferred Alignment leaves the proposed Rothes III on-site substation within a conifer planation, traveling east for approximately 500 m before passing over recently felled open ground. West of Rothes the Preferred Alignment crosses a narrow riparian woodland and then into mixed woodland at the Burn of Rothes which includes NWSS native pinewood. Turning northeast across Broad Burn it crosses the narrow riparian woodland NWSS Upland birchwood before following Small Burn through woodlands at the edge of a large conifer plantation. Alignment Variant P2 would have a minimal impact on this woodland and would therefore lead to reduced felling in comparison with the Preferred Alignment.

7.2.71 East of Speyburn Distillery the Preferred Alignment passes into Straen Buckie Wood which is NWSS consisting of upland birchwood. The alignment continues east into Sourden Woods and reaches an area of native pinewood before turning southeast towards Dundurcas Farm and Kirkhill Farm. Alternative Alignment A branches off from the Preferred Alignment to the south of Straen Buckie Wood and does not pass through it. Instead, it would cut across the River Spey in two places where it passes over two narrow strips of the Wood of Arndilly which is both AWI LEPO 1860 and NWSS wet woodland. Alignment Variants P3 and P4 would also avoid Straen Buckie Wood and Sourden. However, Alignment Variant P3 would cut through lowland mixed deciduous woodland and the Wood of Arndilly (LEPO) and NWSS wet woodland along the riverbanks as it crosses the river as HDD/Cable.

7.2.72 Alignment Variant P1 would avoid the woodlands to the north of the town of Rothes, Straen Buckie Wood and Sourden Woods. However, it would cut through the Wood of Arndilly (LEPO and NWWS) for approximately 2 km to the southern bank of the River Spey.

7.2.73 South of the B9103 near Auchroisk Distillery, the Preferred Alignment would run parallel to a large conifer plantation consisting of Cummings Wood and the Woods of Knockmore. These woodlands are classed as both AWI LEPO 1860 and NWSS native pinewood. The Preferred Alignment crosses this forestry for approximately 250 m on the forest's northern protruding edge southeast of Auchroisk Distillery. Alignment Variant P6 would travel through it for approximately 1.5 km. The Preferred Alignment would require less felling of these woodlands and therefore remains preferable. Alignment Variant P5 and Alternate Alignment A would run to the north of Auchroisk Distillery, into where the Wood of Shalloch which is designated AWI LEPO 1860 and noted in NWSS as upland birchwood and nearly native pinewood plantation. Immediately to the north of the distillery Alternate Alignment A touches upon an area of NWSS lowland mixed deciduous woodland and then crosses parts of NWSS wet woodland before entering the Wood of Cairnty AWI LEPO 1860. Before meeting up with the Preferred Alignment the Alternate Alignment A follows a narrow shelterbelt which turns into NWSS upland birchwood at the southern point. In comparison to this mid-section of Alternate Alignment A, only a narrow tip of NWSS upland birchwood adjacent to the Wood of Shalloch is crossed by the Preferred Alignment and crossing the railway it skirts the edge of the Wood of Shalloch.

7.2.74 Alignment Variant P7 and Alignment Variant P8 have a minimal impact on woodland. Although datasets show Alignment Variant P8 running through an area AWI LEPO, aerial imagery shows this as being recently felled.

7.2.75 North of the Aberdeen to Inverness railway line the Preferred Alignment cuts a narrow strip of Gallow Hill AWI LEPO 1860. At Rosarie the Preferred Alignment crosses the point of AWI LEPO 1860 at Rosarie Wood. East of Rosarie this it dissects a woodland listed in NWSS as upland mixed Ashwood. Alignment Variant A1 would require a corridor through two areas of woodland including a narrow strip of the Wood of Mulderie and the northern tip of a mixed conifer plantation.

7.2.76 On approach to Blackhillock substation from the west, the small woodland at Maisley is both AWI LEPO 1860 and NWSS wet woodland. Alternate Alignment A will travel through the southern section of the Wood of Maisley, though aerial imagery shows this as being recently felled. The Preferred Alignment would also pass over a small narrow strip of NWSS upland mixed ashwood before reaching the substation.

7.2.77 Overall, in the area surrounding the River Spey's prominent northern meander to the east of Rothes, Alignment Variant P3 and Alignment Variant P4 would avoid the NWSS of Straen Buckie Wood and the Sourden Woods. These alignments would therefore lead to reduced felling in these woodlands in comparison to the Preferred Alignment, although the potential for future erosion of the riverbank and potential impacts on Woods of Arndilly would need to be considered. In the area surrounding Auchroisk Distillery, the Preferred Alignment is preferable to Alignment Variant P6 which would travel through the large conifer plantation consisting of Cummings Wood and the Woods of Knockmore for approximately 1.25 km. In general, the Preferred Alignment is comparable to the other alignment variants in terms of constraints posed by forestry for the remaining eastern sections of the connection.

Recreation

7.2.78 There are numerous points of recreational interest along the Preferred Alignment. The area is popular with walkers, hikers, cyclists, canoeists, anglers, whiskey enthusiasts and heritage railway enthusiasts. The various recreational and tourist sites within the town of Rothes, including a golf course, castle, and distilleries and the town of Keith, including a golf course, camping sites and picnic areas, are unlikely to present constraints.

7.2.79 The Preferred Alignment would cross the core path SP01 to the west of Rothes, before it splits in two, to the north of Dounie Cott, to become the continued SP01 and SP12. This could lead to potential influence on the visual amenity of recreational users, and potential short-term disruption when the path is crossed by construction works. As it departs from the Preferred Alignment, slightly north of Dounie Cott, Alignment Variant P1 would cross both the core paths SP01 and SP12 to the west of Rothes after they have split, leading to potential increased influence on the recreational amenity of the routes due to visual effects, and potential short-

term disruption during construction. However, these are unlikely to lead to any notable compromise to the overall recreational amenity of the routes.

7.2.80 As an OHL Alignment Variant P1 would pass through farmland to the south of Rothes Golf Club and Invergarry Castle and the viewpoint to the west of Rothes where it may be visible and could potentially detract from the recreational amenity. As Alignment Variant P1 would pass through Rothes as a HDD/Cable it would be unlikely to affect the recreational amenity of receptors within the town itself.

7.2.81 To the North of Rothes, the Preferred Alignment passes by a small picnic area along the A941 and then the Speyburn Distillery, though any notable compromise of amenity value is considered unlikely. Alignment Variant P2 would travel closer to the northern edge of the town of Rothes and its various recreational and tourist sites than the Preferred Alignment. However, it is still unlikely to affect the recreational amenity of these receptors. To the north of Rothes, Alignment Variant P2 would avoid the small picnic area along the A941 and would pass to the southeast of the Speyburn Distillery, though no notable differences to recreational amenity are considered likely in comparison to the Preferred Alignment.

7.2.82 The River Spey is popular for both fishing and canoe/kayaking and the recreational value the river could be affected by temporary construction activities. The Preferred Alignment remains in forestry to the north of the River Spey's prominent meander to the east of Rothes, avoiding the river at this point. Alignment Variant P1 would cross the river once while Alignment Variant P3 and Alternative Alignment A would do so twice. While Alignment Variant P4 does not cross the river here, it does run directly beside the northern bank as HDD/Cable. While the recreational amenity of this part of the river could be affected by temporary construction activity or OHLs impeding views this is considered less likely with the Preferred Alignment.

7.2.83 The recreational amenity of the small carpark and a canoe/kayak launch site at Boat o' Brig are unlikely to be affected by the Preferred Alignment as the river flows away from the OHL here. The section of the river upstream of this is a popular salmon fishing area, with numerous small fishing huts along the bank of the River Spey. Potential short-term disruption when the river is crossed by construction works are possible and visual effects could potentially compromise the recreational amenity during operation. However careful consideration of the crossing and micro siting of wood poles should help mitigate these. Alignment Variant P5 diverges from the Preferred Alignment before reaching Boat o' Brig. It runs closer to the canoe/kayak launch point at Boat o' Brig, though with careful siting of the wood poles the recreational amenity would still be unlikely to be affected. Alignment Variant P5 would cross the River Spey closer to the bridges where an existing wood pole OHL line already crosses. This would reduce the sensitivity of recreational users along this stretch of the river and limit potential impacts on the section of the river upstream where fishing is popular.

7.2.84 To the southeast of Boat o' Brig, the Preferred Alignment would cross over The Speyside Way long-distance walking route, where it turns south after passing the property at Bridgeton. Here the OHL could potentially impact the visual amenity from the walk, particularly during construction, though recreational opportunities would be unlikely to be affected.

7.2.85 The Preferred Alignment would pass to the south of Auchroisk Distillery remaining approximately 250 m away at the closest point. Although it would be visible, the OHL would be unlikely to lead to any notable compromise of amenity value, particularly as it would be back-clothed by forestry along this stretch. Alignment Variant P6 would remain within the conifer plantation and be less visible from the distillery than the Preferred Alignment, thus reducing potential impacts on the recreational amenity of the distillery. Upon merging with Alternative Alignment A, Alignment Variant P5 would pass to the north of Auchroisk Distillery, also keeping to the north of the Burn of Mulben. The woodland here would screen the alignment reducing potential effects on the recreational amenity of Auchroisk Distillery as a tourist attraction.

7.2.86 The Glentauchers Distillery would be passed by the Preferred Alignment on its northern and eastern sides at a distance of approximately between 250 m and 500 m. Alignment Variant A1 would follow a similar path

although it would continue travelling eastward. Neither option is likely to compromise the recreational amenity of the distillery.

7.2.87 Towards the eastern end of the Preferred Alignment and Alternative Alignment A, the Keith & Dufftown Historic Railway is crossed once by each, though this is unlikely to lead to any notable compromise of amenity value.

7.2.88 Generally, the Preferred Alignment is comparable to the alignment variants from a recreational amenity perspective. The Preferred Alignment is preferable for preserving the recreational value of the River Spey to the east of Rothes as it reduces the number of crossings. It also has the potential to limit recreational impacts on the section of the river upstream of Boat o' Brig where fishing is popular. Around Auchroisk Distillery, Alignment Variant P5, Alignment Variant P6 or Alternative Alignment A may offer some advantage to the Preferred Alignment in terms of recreational amenity from around Auchroisk Distillery as they would largely be screened by woodland.

Planning Context

7.2.89 Adherence to National, Regional and Local planning policy will in large part depend on avoiding or minimising potential constraints noted, particularly in relation to potential impacts on the natural environment given presence of designated sites and areas of landscape importance.

7.2.90 The Moray Local Development Plan (MLDP) policies are supportive of projects) that are compatible with landscape character and capacity (Policy EP3), avoid unnecessary disturbance of peat soils (Policy EP16), avoid areas at risk of flooding (Policies DP1 and EP12), avoid or mitigate the impacts of forestry felling (Policy EP7) and safeguard the natural environment (Policies EP1). It is considered that opportunities exist to minimise potential impacts on the River Spey Floodplain, SSSI, SAC and SLA designations and forestry felling, through design, micro-siting of pole locations, or mitigation measures that will allow adherence with planning policy. As such, there is no clear preference for any option in planning policy terms.

7.3 Engineering Topic Areas

7.3.1 Given the similarities between the alignment options, many of the engineering constraints are comparable. The following section draws out where notable differences exist in constraints between options, or otherwise identifies that options are similar and no preference has been identified. A high level summary of the engineering constraints is provided in the following sections.

Infrastructure Crossings

Major Crossings

7.3.2 Several pieces of key infrastructure are located along the alignment options in the area between Rothes III Wind Farm on-site substation in the west and Blackhillock substation in the east. This infrastructure includes, but is not limited to, major crossings of the Aberdeen to Inverness railway line, a transmission gas pipeline, and electrical overhead lines and cables. The River Spey, despite not meeting the criteria of being navigable, is also considered a major crossing for the purposes of this assessment, due to its cultural, economic and environmental significance. The Preferred Alignment encounters approximately 32 major crossings between the two substation locations. The number of major crossings along the Alignment Variants and Alternative Alignments range from 20 % less to 20 % more than the Preferred Alignment, however the type and classification of crossing encountered must be taken into consideration. For, the purpose of this assessment, preference was given to reducing the number of crossings (by overhead lines or cables/HDD) of the River Spey and the gas pipeline. As a result, Alignment Variants P3 and P4 were discounted as P3 would result in three crossings of the Spey, whilst P4 would interact with two high voltage cables, one high voltage line and infringe on the buffer of the gas pipeline respectively. Considering these criteria, the Preferred Alignment was ultimately preferred.

Road Crossings

7.3.3 An extensive road network exists within Proposed Route consisting of A, B and C class roads in addition to local access roads. A and B class roads create a more significant crossing challenge from an engineering perspective and therefore, greater consideration is given to these for the purposes of this assessment. The A-roads present in the study area are the A941 and A95 while the B-roads include the B9013, B9014 and B9015. The Preferred Alignment encounters 5 crossings of A and B category roads. All other alignment options also cross a combination of the aforementioned roads 5 times with the exception of Alignment Variant P4 which has 4 crossings. No preference is given for consideration of road crossings.

Environmental Design

Elevation

7.3.4 The elevation on which an overhead line is constructed can have a significant effect in terms of influencing both wind and ice loading resulting in reduced span lengths. In order to limit these effects, it is favourable to minimise the positioning of overhead lines on lands above 200 m OD. The area approaching the Rothes III Wind Farm on-site substation is located at an elevation of greater than 200 m OD. A section of the Preferred Alignment (approx. 2.25 km length) rises from an elevation of 200 m OD to an elevation of approximately 280 m OD. As this section is common to all Alignment Variants and Alternative Alignments, no preference is given to any particular alignment option.

Ground Conditions

Terrain

7.3.5 Unfavourable terrain can lead to many design and construction related challenges for new overhead line builds. Steep slopes, mountainous terrain and/or cliffs create difficult pinch points for overhead lines to overcome and therefore, it is preferred to limit construction in this terrain where possible. The Preferred Alignment encounters some difficult terrain in the section between Rothes III Wind Farm on-site substation and Rothes which includes crossings of both the Burn of Rothes and the Back Burn as well as steep side slopes. The burns can be described as deep, wide valleys, particularly from a poling perspective which requires flat terrain on either side of the burn. This may present challenges in spanning directly across the burns considering the structure span constraints. These terrain pinch points are common to all Alignment Variants and Alternative Alignments with the exception of Alignment Variant P1 which encounters its own unique terrain and side slope challenges along the southern banks of the River Spey. On the east side of the River Spey, Alternative Alignment A, encounters difficult terrain and steep side slopes to the north of the railway line. Access into this area for construction and maintenance purposes may prove difficult and therefore, Alternative Alignment A, and associated options Alignment Variant P5 and Alternative Alignment A1 are deemed not preferred. The Preferred Alignment is the preferred option considering the terrain constraints.

Peat

7.3.6 Construction in areas of peat can pose several engineering challenges during both the design and construction stages of a new overhead line. However, with appropriate assessment, design and mitigation peat is not necessarily a development constraint. The Preferred Alignment passes through a peat deposit for approximately 2 km length in the area approaching Rothes III Wind Farm on-site substation with further discrete peat deposits of approximately 200 m and 550 m located due west of Rothes town. To the east of the River Spey, near Mulben, the Preferred Alignment passes through a further peat deposit for approximately 200 m. The Alignment Variants and Alternative Alignment options do not eliminate the presence of peat in the alignment and therefore, no preference is given for this criterion.

Construction / Maintenance

7.3.7 Constructability is an important consideration for all OHL developments considering the wide-ranging terrain and multiple obstacles that are often encountered. Therefore, giving some forethought to access routes and the number of critical angle masts to be used on this OHL is important for the construction and future maintenance requirements of the line.

Access

7.3.8 Adequate access is an important consideration for both construction and maintenance activities. It is preferable to position an overhead line in close proximity to existing public roads and/or networks of tracks where possible and to also minimise the number infrastructure crossings, particularly gas pipelines, located in non-reinforced or open ground. The Preferred Alignment provides good access opportunities on the west side of the River Spey with public roads or tracks generally within less than 1000 m of the alignment. One potential access pinch point is identified north of the River Spey horseshoe at Sourden Woods however this is considered less significant to the access constraints faced by the Alternative Alignment A (and subsequently, P3 and P4), west of the Spey where a section of the alignment is “land-locked” by the gas pipeline. A section of the Alignment Variant P5 is also “land-locked” between the gas pipeline and the River Spey near Boat o’Brig. On the east of the River Spey, access is generally good with the majority of the alignment options within less than 1000 m of public roads or existing farm, forestry or windfarm tracks. Considering the above, preference is given to the Preferred Alignment.

Angle/Strain Structures

7.3.9 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. A high level assessment of the potential number of angle structures required was undertaken. Considering the Preferred Alignment, the number of angle structures required on the Alignment Variants and Alternative Alignments can vary significantly (by as much as +/- 20 %). It is noted, however that some of this difference can be attributed to the variants with the cable sections. Of the overhead line only options, Alternative Alignment A, may have the least number of angle structures, however this design may not be feasible due to terrain and other constraints. Therefore, the Preferred Alignment is the preferred option.

Proximity

Clearance Distance

7.3.10 An initial assessment determined that there are over 300 existing and proposed dwellings located within the Proposed Route between Rothes III Wind Farm substation and Blackhillock substations. A radial clearance buffer of at least 100 m should be maintained from the proposed alignment options to these dwellings and careful consideration was given when planning the alignments to provide this clearance where possible. The Preferred Alignment provides the 100 m clearance margin to buildings and dwellings throughout with the exception of one potential infringement immediately east of the River Spey near Rothes. This infringement occurs at the same location as an existing HV line and is common to all the Alignment Variants. The Alterative Alignments A and A1, do not infringe on the required clearance buffers to dwelling and buildings and therefore is the preferred option considering this constraint.

7.4 Cost Topic Areas

7.4.1 Costs were not assessed in detail as part of this alignment selection process but were considered during development design meetings in which the alignment options were discussed. The following provides an overview of the main considerations relating to costs.

Capital

7.4.2 The preferred technology solution is a new 132 kV single circuit OHL supported on a trident wood pole. From a capital cost perspective this option reduces costs when compared to other technologies. This is largely due to the reduced foundation and access requirements.

7.4.3 Underground cable would be utilised for approximately 1 km to connect into Blackhillock substation for the Preferred Alignment and variations from it. Further engineering studies will be undertaken to determine the specific point at which the OHL would require to change from trident wood pole to underground cable. Underground cable is notably more expensive than OHL solutions for any given distance, and generally used only in instances where an OHL is unsuitable. Further underground cables would be required for Alignment Variants P1, P3 and P4, making them less preferable in cost terms than other options considered.

7.4.4 Tree felling and associated compensatory planting would be a particular consideration for this development due to the presence of woodland along all alignment options. Alignments which require less felling are thus preferred due to reduced tree felling costs, giving slight preference to the Preferred Alignment in combination with the UGC of Alignment Variants P3 or P4.

7.4.5 Although a combination of the Preferred Alignment with Alignment Variant P3 or P4 would reduce tree felling costs, the increased costs associated with undergrounding cables would likely outweigh any savings. Given these conflicting preferences, all options are generally considered comparable in terms of capital costs, with a slight preference for the Preferred Alignment given reduced underground cable requirements.

Operational

7.4.6 Operational costs relate to inspections and maintenance. Compared to other overhead line technologies a single circuit OHL supported on a trident wood pole is relatively straight forward technology to inspect and maintain. As noted previously, underground cables entail higher maintenance costs than OHLs making Alignment Variants P1, P3 and P4 less preferable.

7.4.7 Given the similarities between the remaining alignment options, operational costs are considered to be comparable with no notable preference.

7.5 Comparative Analysis Summary

Environmental Summary

7.5.1 The key environmental considerations in determining the preferred alignment are Natural Heritage Designations, Landscape and Visual, and Forestry.

7.5.2 The River Spey SSSI is a significant watercourse within the Proposed Route. The River Spey and the lower reaches of Broad Burn (at Rothes) and Burn of Mulben (at the B9103 crossing of the Spey) are also designated as SAC. No other designated sites are located within 1 km of the Proposed Route. The Preferred Alignment crosses the SSSI and SAC once as an OHL to the south of Boat o' Brig prior to reaching Auchroisk Distillery. Subject to control measures and good practice it is unlikely that works associated with construction would impair water quality and compromise the qualifying interests of the adjacent River Spey SSSI and SAC. In

order to reduce the number of crossings of the River Spey SSSI and SAC and potential effects on Natural Heritage Designations the Preferred Alignment would be the preferred option.

7.5.3 Landscape and visual impacts are another key consideration for the alignment options due to the potential for impacts upon sensitive landscape and visual receptors in the vicinity. The preferred alignment should seek to avoid exceeding the capacity of the landscape to accommodate this type of development and minimise visual impact on views from nearby sensitive visual receptors, such as residential properties. The preferred combination is for the Preferred Alignment with Alignment Variant P3, undergrounded sections to the east of Rothes.

7.5.4 Forestry is a further key consideration for the alignment options given its presence throughout the Proposed Route, complexity of woodland structure and its sensitivity, particularly native woodland areas. The preferred alignment should seek to minimise felling wherever practicable, with a particular focus on avoiding felling of native woodland. The Preferred Alignment in combination with the UGC of Alignment Variants P3 or P4 would be the preferred options to reduce felling of NWSS of Straen Buckie Wood and the Sourden Woods. Although the potential for future erosion of the riverbank and potential impacts on Woods of Arndilly would need to be considered. Further eastward the Preferred Alignment remains the preferred option as it would minimise felling of Cummings Wood and the Woods of Knockmore. For the remaining eastern sections of the connection the Preferred Alignment is comparable to the other alignment variants in terms of potential impacts on forestry.

Engineering Summary

7.5.5 The engineering constraints assessed for this report has confirmed the Preferred Alignment, Alignment Variants and Alternative Alignments are broadly comparable with different options providing marginal benefits for some constraints over others. It is important, however, to take a holistic approach to this assessment and the interaction of the engineering constraints as a whole. Major crossings, terrain, access and angle structures are important criteria to consider when designing, constructing, and maintaining an overhead line. The Preferred Alignment was preferred considering these four criteria while no preference was determined for three of the remaining four constraints. Therefore, overall preference is given to the Preferred Alignment.

Cost Summary

7.5.6 Underground cabling and tree felling has been identified as the significant capital cost considerations likely to differ between the alignment options considered, with a preference given to the Preferred Alignment due to its reduced felling and underground cable requirements compared with other options.

7.6 Preferred Alignment taken forward to Stakeholder Consultation

7.6.1 The Preferred Alignment taken forward to stakeholder consultation has been informed by consideration of environmental, engineering and cost constraints.

7.6.2 From an environmental perspective, the Preferred Alignment is generally favourable across most topic areas. Within the Spey Valley, the Preferred Alignment reduces the number of crossings of the River Spey SSSI and SAC in comparison with other variants, and therefore offers the opportunity to reduce potential effects on the Spey, albeit other variants do offer opportunities to reduce effects in some topic areas .

7.6.3 From an engineering perspective the Preferred Alignment is favoured due to the advantages it offers compared with other variants in terms of major crossings, terrain, access and angle structures, particularly in relation to the single crossing of the River Spey and less challenging terrain to the east of the Spey. Constraints for other topic areas such as elevation, peat and road crossing criteria were generally comparable.

7.6.4 From a cost perspective the Preferred Alignment is slightly preferred over other variants given the reduced underground cable and tree felling requirements. However, it is noted that this would likely be a small part of the overall capital costs of the development and is not weighted as heavily as environmental considerations.

7.6.5 **Figure 11** shows the Preferred Alignment.

8. CONSULTATION ON THE ALIGNMENT OPTIONS

8.1.1 SSEN Transmission places great importance on, and is committed to, consultation and engagement with all parties, or stakeholders, likely to have an interest in proposals for new projects such as this. Stakeholder consultation and engagement is an essential part of an effective development process.

8.2 Questions for Consideration by Consultees

When providing comments and feedback on this Consultation Document, SSEN Transmission would be grateful for your consideration of the questions below:

- 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?

8.3 Next Steps

8.3.1 In-person and virtual online consultation events will be held, as detailed in the preface of this document. The responses received from these consultation events, and those sought from statutory consultees and other key stakeholders, will inform the identification of a Proposed Alignment to take forward to Stage 4: EIA and Consenting.

8.3.2 All comments are requested by **15 October 2021**. A Report on Consultation will be produced which will document the consultations received, and the decisions made in light of these responses, prior to confirming the Proposed Alignment.

8.3.3 The Proposed Alignment to be taken forward will require careful consideration during the EIA and Consenting stage of the project. Should further site and desk-based analysis at the EIA and Consenting stage identify a particular constraint, a further review of the Proposed Alignment may be required.

8.3.4 It is anticipated that an application for consent for a proposed alignment will be submitted in early 2022.