Scottish & Southern Electricity Networks

Report on Consultation – Route Options

Elchies (Rothes III) Wind Farm Grid Connection

September 2020

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Scottish & Southern Electricity Networks

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Figures

GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line, along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
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, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between 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)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development.
GWDTE	Ground Water Dependent Terrestrial Ecosystem
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 reduction 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.
RAG Rating	Each topic within the environmental, technical and cost categories should be considered in terms of the potential for the development to be constrained and a Red/Amber/Green (RAG) rating applied as appropriate.
Riparian Woodland	Natural woodland home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.

Term	Definition
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 supporting 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.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
The National Grid	The electricity transmission network in Great Britain.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between SHE Transmission and a landowner upon whose land an overhead line is to be constructed for the installation and retention of the transmission equipment.

PREFACE

This Report on Consultation has been prepared by Scottish Hydro Electric Transmission plc (SHE Transmission) with input by ASH Design and Assessment Ltd. to provide a summary of the responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) during consultation between June 2020 and August 2020 in response to the preferred route identified for the proposed Elchies (Rothes III) Wind Farm Grid Connection[1].

Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the Covid 19 pandemic these events could not be held.

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

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

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

- 8th July 2020; 13:00 – 15:00 and 17:00 – 19:00; and
- 9th July 2020; 14:00 – 16:00 and 18:00 – 20:00

This Report on Consultation also provides a summary of how SHE Transmission have responded to comments received by key stakeholders on the preferred route, and details the actions that will be taken as the project progresses through to the alignment stage.

[1] SHE Transmission (July 2020). Elchies (Rothes III) Wind Farm Grid Connection Consultation Document

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 2024. 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.

This Report on Consultation documents the consultation process which has been undertaken for the project between June and August 2020. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that Route Option A1 should be taken forward as the preferred route, within which further study will seek to identify alignment options. It is recognised that the preferred route runs through a sensitive environment with challenging terrain in places. However, the preferred route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will become the proposed route taken forward to the alignment stage of this project.

1. INTRODUCTION

1.1 Background and Purpose of Document

Scottish Hydro Electric Transmission Plc (SHE Transmission) is proposing to construct a new 132 kV overhead line between Rothes III wind farm on-site substation and Blackhillock substation near Keith. The project is known as the Elchies (Rothes III) Wind Farm Grid Connection.

The project would comprise 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.

This Report on Consultation documents the consultation process for the project between June 2020 and August 2020, during the route option stage of the project. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route[2].

The report describes the key responses received and details the actions taken in response to the issues raised.

1.2 Objectives

The objectives of this report are:

- To document the consultation process between June 2020 and August 2020;
- To summarise feedback received from stakeholders;
- To document actions undertaken in response to feedback where relevant; and
- To clearly set out how the preferred route has been informed by the consultation process.

1.3 Document Structure

This Report on Consultation is structured as follows:

Part 1: Introduction - setting out the purpose of the Report on Consultation;

Part 2: Project Overview – outlines the background to the project and provides a description of the key elements;

Part 3: Consideration of Route Options – describes how the preferred route was identified;

Part 4: The Consultation Process – describes the framework for consultation and methods which have been employed;

Part 5: Consultation Responses from Statutory and Non-Statutory Consultees - summarises the responses from these bodies;

Part 6: Community Consultation Responses from the Virtual Public Exhibition – summarises the range of responses and key comments and issues arising through the consultation process;

Part 7: Project Responses to Consultation – describes how the comments and issues raised during consultation will be addressed; and

Part 8: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

[2] Identified within the Elchies (Rothes III) Wind Farm Grid Connection Consultation Document (July 2020), produced by SHE Transmission plc

2. PROJECT OVERVIEW

2.1 The Need for the Project

SHE Transmission plc is a wholly owned subsidiary of the SSE plc group of companies. SHE Transmission plc 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.

The proposed Rothes III wind farm (capacity 99 MW) in Moray requires connection to the electricity transmission network at Blackhillock substation by June 2024. 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) Windfarm 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. SHE Transmission is not responsible for this connection to the distribution network and therefore it is not considered further in this report.

2.2 Preferred Technology Solution

On balance based on the options assessed and taking maintenance, environmental and cost considerations into account, the preferred solution is a new 132 kV single circuit OHL supported on a trident wood pole[3]. The main reason for discounting undergrounding the entire circuit is maintenance of the line in the future. In the event of a fault on the line, the fault can be detected and rectified in a matter of days. Whereas a fault in an underground cable could potentially take months to fix. Another reason cabling the entire circuit has been discounted is due to the footprint which would be required to install the cables which would increase the potential to damage the local environment during construction.

2.3 Alternative Options Considered

While SHE 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 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.

2.4 Proposals Overview

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. More detailed information is set out in the Consultation Document[4].

[3] The consideration of other technology options may be required in areas where particular physical or environmental constraints are identified.

[4] SHE Transmission (July 2020). Elchies (Rothes III) Wind Farm Grid Connection Consultation Document

Plate 2.1: Wood Pole Trident Configuration

2.5 Access during Construction

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.

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

3. CONSIDERATION OF ROUTE OPTIONS

3.1 Introduction

The Consultation Document[5] sets out the approach to the consideration and appraisal of route options, in line with SSEN's routeing guidance[6]. The guidance sets out SHE Transmission plc's approach to selecting a route for an OHL. This document helps SHE Transmission plc 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.

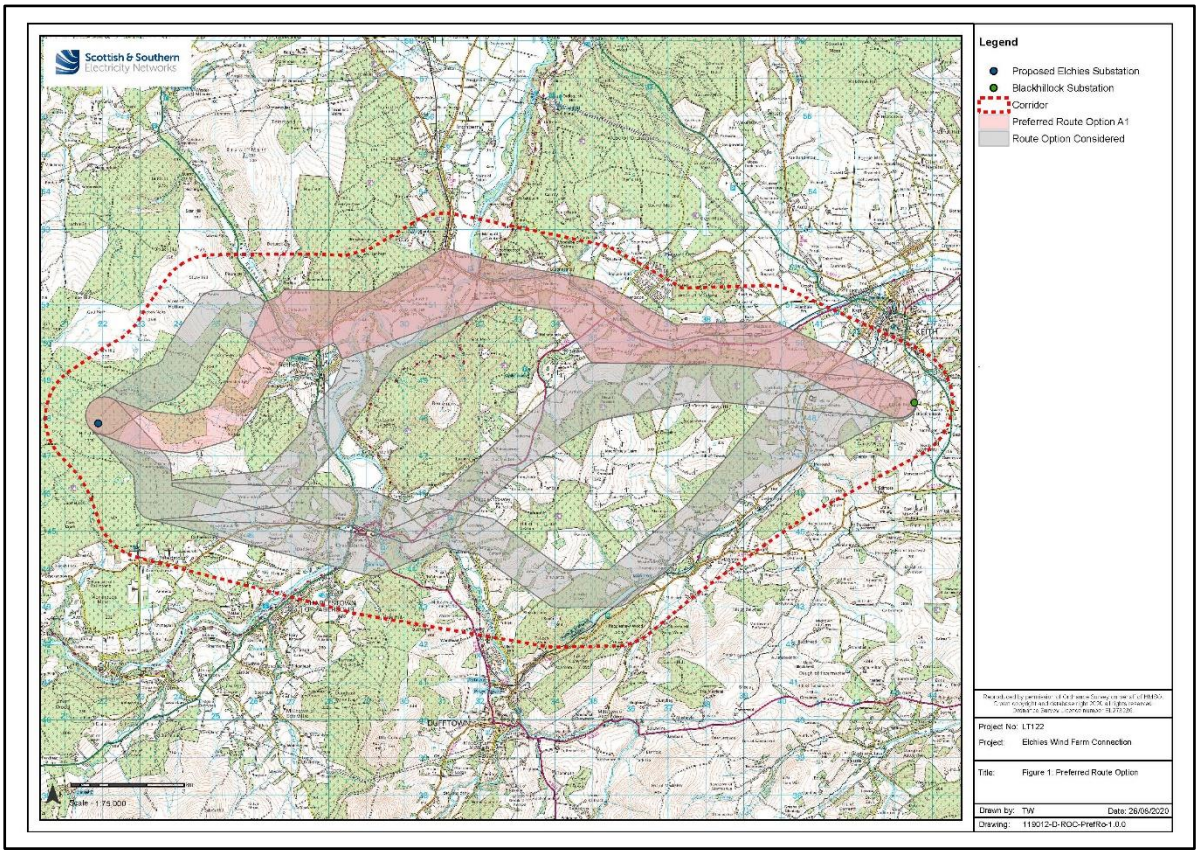
In line with the principles outlined in the guidance document, the method of identifying a preferred route has involved the following 4 key tasks:

- Identification of the baseline situation;
- Identification of alternative route options;
- Environmental, technical and economic analysis of route options; and
- Identification of a preferred route.

3.2 Identification of Preferred Route

The preferred route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors. The preferred route is shown in Plate 3.1 (see also Figure 1).

Plate 3.1: Preferred Route



[5] SHE Transmission (July 2020). Elchies (Rothes III) Wind Farm Grid Connection Consultation Document

[6] SHE Transmission (March 2018), Procedures for Routeing Overhead Lines of 132kV and above

The preferred route would require careful consideration during the alignment selection stage of the project to seek to achieve an acceptable alignment with minimal environmental effects. Moving forward, confirmation of the preferred alignment will be informed by further consultation exercises, and through detailed surveys, which may identify any additional and/or currently unknown engineering, environmental or land use constraints. Should further site and desk-based analysis at the alignment selection stage identify a particular constraint, a further review of route or alignment options may be required prior to the identification of a preferred alignment.

4. THE CONSULTATION PROCESS

4.1 Overview

In accordance with SSEN's guidance[7] , a process of consultation on the preferred route has been undertaken.

4.2 Methods for Consultation

The following methods were used to consult on the preferred route, as set out below.

4.2.1 Consultation Document

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 from https://www.ssen-transmission.co.uk/projects/skye-reinforcement/

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

Table 4-1: List of Stakeholders

Stakeholders	
Statutory Consultees	
Moray Council	Historic Environment Scotland
Scottish Environment Protection Agency	Energy Consents Unit
Scottish Natural Heritage	
Non-Statutory Consultees	
Speyside Community Council	River Spey Fisheries Board
Scottish Forestry	Scottish Water

It had been intended to make the Consultation Document available in hard copy at publicly accessible locations along the route. However, as a result of the Covid-19 pandemic, this was not possible.

Instead landowners, residents and local communities were made aware of the Consultation Document which was made available via the dedicated project website. Updates were issued via email to project website subscribers, local community councils and ward councillors.

Feedback on the Consultation Document was requested by 7th August 2020.

Stakeholders were invited to provide feedback through the following methods:

- A series of questions were asked within the Consultation Document requesting comments on specific aspects of the project as follows:
  - Have we explained the need for this Project adequately?
  - Have we explained the approach taken to select the preferred route adequately?
  - Are there any factors, or environmental features, that you consider may have been overlooked during the preferred route selection process?
  - Do you feel, on balance, that the preferred route selected is the most appropriate for further consideration at the alignment selection stage?
- A feedback form was also provided on the project webpage allowing users to submit comments.

[7] SSEN (March 2018), Procedures for Routeing Overhead Lines of 132kV and above

4.3 Public Consultation Events

Under normal circumstances, consultation on the project would involve public engagement events held in the local area and such events were planned. However, as a result of the Covid 19 pandemic these events could not be held.

To continue engagement on the project SHE Transmission developed an online consultation tool, to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, and the opportunity to share views on the proposals as illustrated in Plate 4.1.

Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current proposals. A feedback form was provided on the portal and all visitors were invited to complete this.

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

- 8th July 2020; 13:00 – 15:00 and 17:00 – 19:00; and
- 9th July 2020; 14:00 – 16:00 and 18:00 – 20:00.

Plate 4.1: Virtual Event Portal

The virtual consultation events were advertised in the local press, SSEN's social media channels, the dedicated project management website and through letters and consultation booklets posted to over 7,000 properties. Local Councillors, Ward Managers and Community Councils along the route were also informed.

Visitor counts during the virtual consultation event recorded 50 unique users (individuals devices accessing the site) and 517 page views (the number of different pages loaded across the site) across the two interactive sessions. There were 18 chats initiated with the project team via the live chat function with a total of 49 questions asked by visitors. A total of 17 feedback forms and 3 emails were received by SHE Transmission during or following the virtual consultation events.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON STATUTORY CONSULTEES

Introduction

Table 5.1 sets out a summary of the feedback received by statutory and non statutory consultees following the consultation period (June to August 2020). A response to the feedback is also provided by SHE Transmission, together with confirmation of the action to be taken, where relevant.

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SHE Transmission
Historic Environment Scotland (HES)	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. At this stage and from the information provided so far, HES consider that it may be possible to accommodate an OHL of this scale within the preferred route, with appropriate mitigation in the form of careful design. HES will welcome further consultation on the OHL design to ensure that significant effects are avoided. The alternative route options would in some cases incorporate greater numbers of Category A listed buildings within and in proximity to the route options. Should any of these options be further considered these assets should be considered for potential direct impacts and impacts to their settings.	These comments are noted. Further work to consider potential impacts on the historic environment will continue throughout the alignment stage of the project, so as to mitigate adverse effects on designated assets where possible. Ongoing consultation with HES will be maintained.
SEPA	SEPA have no specific overall preference of route option, but where applicable have provided advice on route preferences in regard to specific issues. These are detailed below. SEPA also note that consideration of potential environment effects is undertaken in line with appropriate guidance and relevant information is provided prior to an application being submitted in relation to engineering	Comments are noted and responses provided below. Dialogue with SEPA will be maintained throughout the project. Reference will be made where appropriate to SEPA guidance documents prior to an application being submitted.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	activities in accordance with standard SEPA requirements.	
	Areas where deep peat and GWDTEs are present should be avoided. If this is not possible and justification has been provided, appropriate mitigation measures should be put in place to protect these habitats.	Further environmental and engineering studies will be undertaken at the alignment stage to minimise potential effects on deep peat and GWDTEs where practicable, and inform appropriate mitigation measures.
	Routes A, B or C have the least potential 'importance 1' peat disturbance, and as such are preferred from a peat perspective. Depending on alignment, Route A1 could also be acceptable. Peat probing should be used to inform the alignment and more detailed drawings provided showing the results of this with the infrastructure overlain.	Areas of deeper peat will be avoided as far as practicable.
	Rothes has a long history of flooding from a combination of the Back Burn, the Burn of Rothes and the Black Burn. To mitigate against this flooding, Moray Council completed the Rothes Flood Alleviation Scheme (FAS) in 2011, to provide a standard of protection of 1 in 100 years plus an allowance for climate change. SEPA would therefore request that it is demonstrated that any works associated with this development has no impact on the present flow regime of these burns and the level of protection provided by the Rothes FAS.	This comment is noted and potential impacts on the flow regimes of these burns will be considered during the alignment stage of the project.
	The preferred route (A1) crosses the River Spey at Boat of Brig. SEPA operate a hydrology station on the River Spey at this location and it must be demonstrated that there will be no impact on its operation, resulting from this development.	The location of this hydrology station is noted and will be given due consideration during the alignment stage.
	Close to Keith the preferred route (A1) crosses the River Isla. Keith has experienced flooding in the past and therefore it must be demonstrated that no works associated with this development will increase the flood risk downstream in the town.	Flood risk will be considered during the alignment stage of the project.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands.	This comment is noted.
Scottish Forestry (SF)	The Scottish Government's Control of Woodland Removal Policy (CoWRP) includes a strong presumption in favour of protecting Scotland's woodland resources. SHE Transmission should demonstrate that any woodland removal is necessary and unavoidable. This should be allowed only where it would achieve significant and clearly defined additional public benefits, and compensatory planting proposals designed to mitigate impact of any proposal should form part of the development proposals and comply with the UK Forestry Standard. The preferred route overlaps many woodlands that would have this level of protection through the policy. Hopefully the selected route is wide enough to avoid these areas, however there is a definite pinch point from the Boat o' brig east to Mulben, where a high proportion of the route consists of woodlands that would have a strong presumption against removal.	This comment is acknowledged. Potential impacts on woodland and commercial forestry will seek to be minimised at the alignment stage, where practicable. If required, compensatory planting proposals would be developed.
Scottish Natural Heritage (SNH)	The preferred route crosses the River Spey and a large portion of the route is within the river's catchment with potential to impact on tributaries and wetlands linked to the river system. The River Spey is a SSSI and a SAC. The tributaries, the Burn of Rothes, Back Burn, Broad Burn and Burn of Mulben, are partially included within the boundary of the SAC. In most cases it should be possible, with considerate planning and mitigation, to avoid impacting on the watercourses and wetlands linked to the Spey and therefore avoiding harm or damage to the qualifying features of the SAC / SSSI. It is	Comments are acknowledged. Further environmental and engineering studies will be undertaken at the alignment stage to find an acceptable alignment across the River Spey catchment, and identify appropriate mitigation measures to minimise potential impacts. Dialogue with SNH will be maintained through this process.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	likely that a suite of best practice and pollution prevention measures would be sufficient to offer enough protection but there may be locations along the route where the soil conditions or slope stability add an increased risk of erosion that may require specific measures to manage that risk. The catchment of the Burn of Rothes and the Mulben Burn have been prone to erosion and landslips previously. With advice from experts SHE Transmission may find the alignment should focus on areas of more gentle slopes and stable soils.	
	The preferred route comes into contact with the Speyside Way long distance route (LDR) at Boat O'Brig. Visibility maybe somewhat limited on the valley floor but the LDR rises up both sides of the Mulben valley so views of the new OHL are likely. There are also existing OHLs that follow a similar route so 'clutter' may be an issue here given landscape constraints.	This comment is acknowledged. Potential impacts on landscape and visual receptors will seek to be minimised at the alignment stage, where practicable.
	The preferred route only includes one small section of ancient woodland of semi-natural origin as recorded on the Ancient Woodland Inventory. Other sections of long-establish woodland (of plantation origin) are also traversed by the route. The alignment will determine the impact the project will have on woodland and the Scottish Government's Control of Woodland Removal Policy will apply where woodland will be lost to accommodate the route, wayleave and any associated access and compounds etc. Anticipating that it will not be possible to avoid all woodland, some compensatory planting will be necessary and from SNH's perspective there is an opportunity here during future public consultation to seek the communities' views on what type of planting and where could offer enhanced benefits.	This comment is acknowledged. Potential impacts on woodland and commercial forestry will seek to be minimised at the alignment stage, where practicable, and opportunities for compensatory planting will be reviewed.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	The route crosses Hunt Hill, an area of heathland, where black grouse and some upland wader species have been recorded recently. Hunt Hill also has an approved woodland creation scheme across it. There may be recent survey data available that might help inform alignment (e.g. from RSPB).	This comment is acknowledged and recent survey data will be sought to inform the alignment.
Scottish Water	Scottish Water has no objection to this planning application.	This comment is acknowledged.
	The development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets. The proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Further assessment of risks and consultation with Scottish Water required to determine potential impacts on these assets / catchments, and appropriate mitigation.	Further environmental and engineering studies will be undertaken at the alignment stage as appropriate to seek to find an acceptable alignment that minimises potential impacts on the water environment and Scottish Water assets. Reference will be made to Scottish Water guidance documents as appropriate. Dialogue with Scottish Water will be maintained through this process.
Speyside Community Council	An in-person consultation process would have been preferable. Issues were raised with the readability of the booklet and with accessibility of the virtual consultation. Concerns were raised about the ability of individuals to participate in the consultation due to broadband capacity or access to appropriate technology, further compounded by the current COVID-19 restrictions.	This comment is acknowledged. Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the Covid-19 pandemic these events could not be held. SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time.
	Questions were also raised about the potential to use an underground cable and potential associated costs, monetary, environmentally and visually.	Undergrounding the entire circuit has been discounted for a number of reasons. The main reason is for the maintenance of the line in the future. In the event of a fault on the line, the fault can be detected and rectified in a matter of days. Whereas a fault in an underground cable could potentially take months to fix. Furthermore the footprint required to install the cables (a 6m wide and 1.5m deep

Stakeholder	Summary of Feedback	Response by SHE Transmission
		trench along the route) would increase the potential to damage the local environment during construction. From a cost perspective and as a rough guide for a 132kV circuit based on a kilometre of transmission overhead line (dependant on the price of metal) typical cost difference would be between 4 and 8 times more expensive for a cable.
	Questions were raised about whether landowners would be compensated.	The project land manager would discuss the wayleaves process with any affected land owners should the selected alignment cross over their land.
	Questions were raised about the wind farm location due to confusion around the naming of the project.	The proposed Rothes III wind farm is in the vicinity of the hill of Carn na Calliche, approximately 4 km west of Rothes village in Moray. It is located to the east of the existing Rothes I and II wind farms. This transmission connection will be known as the Elchies Windfarm Connection. There will also likely be a connection to the distribution network at a different point and this will be known as the Rothes III Windfarm Connection. The Rothes III Windfarm Connection will not be considered further at this consultation and will be consulted on separately where appropriate.
	Looking forward to being consulted on the Preferred Alignment, preferably through an in-person process.	SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time.

6. COMMUNITY CONSULTATION RESPONSES FROM THE VIRTUAL PUBLIC EXHIBITION EVENT

Introduction

The following part of this report sets out the feedback received by the local community following the consultation period (June to August 2020), including comments received during the live virtual consultation events. The tables also include responses by SHE Transmission, setting out the action to be taken where relevant.

Table 6.1: Local Community Feedback by Topic

Summary of Feedback	Number of Stakeholders to Raise Topic[8]	Response by SHE Transmission
Traffic management needs to be a key consideration for the project. Past projects in the area have failed to follow traffic management plans and have significantly affected the quality of local roads.	1	Traffic management measures will be implemented prior to construction. Ahead of that, determination of the use of the existing road networks will occur during the alignment phase. Interaction with the local road network would be limited as far as possible, and a combination of different types of access will be investigated.
Environmental concerns were raised in relation to: • Badger setts located within the farmland at Mulben Mains. • The potential effects on birdlife. • The habitat provided by the Spey Valley to rare species. • Protection of the natural beauty of the area. • Potential effects on environmental and health concerns more generally.	5	These comments and environmental sensitivities are noted and understood. Further environmental studies will be undertaken at the alignment stage to seek to find an acceptable alignment that minimises potential environmental effects.
Concerns were raised about the potential effects on archaeological assets including listed buildings. More information on the potential effects and mitigation measures was sought.	2	Further environmental studies will be undertaken at the alignment stage to seek to find an acceptable alignment that minimises potential effects on cultural heritage sites and assets.
Approximately half of respondents raised concerns about the visual amenity of the area citing concerns about the intensity of existing electrical infrastructure in the area. Comments on this topic included:	9	The potential for landscape and visual impacts associated with the OHL will be given due consideration during the alignment stage of the project to seek to find an acceptable alignment.

[8] It should be noted that the tally of stakeholders to raise a topic may not match the number of feedback forms submitted or comments listed in the Summary of Feedback column. This is because some stakeholders may have listed more than one issue, or raised several points about a single issue. Some stakeholder comments have also been combined where appropriate. However, where this has been done, care has been taken to identify the number of individuals to raise the topic.

Summary of Feedback	Number of Stakeholders to Raise Topic[8]	Response by SHE Transmission
• Intensity and density of grid connections; • "Urbanisation" and general clutter of the landscape; • Unattractiveness and size of Blackhillock substation; • Convergence of OHLs on Blackhillock substation; • Cumulative effects of biomass plants, OHLs and traffic; • Protection of the natural beauty of the area; • Scarring landscapes; • Destruction of tourist amenities in the local area; and • Potential to hide the OHL within forestry to avoid impacts on open countryside, houses and distilleries.		
Concerns were raised about the potential cumulative effects of the OHL when considered in relation to the biomass plant already in the area.	2	Further consideration will be undertaken at the alignment stage to ensure cumulative impacts are minimised where possible.
Concerns about specific locations within the corridor were raised as follows: • Impacts on the Mulben playpark and football pitch and potential to relocate the play field. • Poles on the south side of the main road between Auchroisk and Glentauchers distilleries. • About land stability around the B9015 where it drops to the flood plain.	2	Further environmental and engineering studies will be undertaken at the alignment stage to seek to find an acceptable alignment through this landscape, giving due consideration to the locations and issues noted.
Concerns about the potential effects on local commercial interests including the distilleries. These included the reliance of the seclusion and natural environment of the surrounding area and future expansion plans.	3	Engagement with local businesses will continue throughout the development stages of the project. The project land manager would discuss the wayleaves process and any arrangements required with affected land owners should the selected alignment cross over their land.
Queries about the merits of running the line underground were also raised by residents.	2	Undergrounding the entire circuit has been discounted for a number of reasons. The main reason is for the maintenance of the line in the future. In the event of a fault on the line, the fault

Summary of Feedback	Number of Stakeholders to Raise Topic[8]	Response by SHE Transmission
		can be detected and rectified in a matter of days. Whereas a fault in an underground cable could potentially take months to fix. (see Table 5.1 above for further information on the associated cost implications)
Concerns were raised by a number of individuals about the lack of attention paid to the concerns of the local community both in the past and going forward. It was noted that local residents concerns should be given the same consideration as larger landowners and business interests.	3	SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time.
Concerns about the information available during the consultation process related to: • The readability of the figures provided in the consultation booklet; • The lack of a figure illustrating the scale of the poles compared to a person; and • The desire for a more open question and answer session where the questions of other members of the community could be heard.	3	SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time. Comments in relation to the presentation of information will be taken on board for future consultations.
A number of comments were made about the ambiguity of the route options. The point was made repeatedly that commenting on / supporting / objecting on a 1 km wide route is very difficult if not premature. These concerns cited the need for an exact alignment to understand the full potential effects of the line.	5	SSEN's routeing guidance seeks to establish the alignment of an OHL through a robust and systematic approach that firstly considers route options at circa 1km width against a series of environmental, engineering and cost considerations. Consultation is undertaken at this stage to seek the views of key stakeholders on the preferred route before progressing to the alignment stage, whereby further consultation will be held.
More detail and direct discussion with affected landowners is required.	1	Engagement with local landowners will continue throughout the development stages of the project. The project land manager would discuss the wayleaves process and any arrangements required with affected

Summary of Feedback	Number of Stakeholders to Raise Topic[8]	Response by SHE Transmission
		land owners should the selected alignment cross over their land.
A number of individuals stated their preference for the preferred route (Option A1). Reasons listed included: • To avoid destroying visual amenity to several tourist amenities, communities and intensifying disruption caused by current overhead wooden pole lines. • It is by far the most suitable option for the Elchies (Rothes III) windfarm connection as it avoid communities between Keith and Dufftown. • It avoids impacting the amenity, quality of life, and impressive views enjoyed by Rothes residents and visitors towards Craigellachie. • Far fewer residential properties will be directly impacted by staying with the preferred option than the others. • Route A1 is by far the best choice. A number of these comments also noted that they would object to the proposals if one of the alternative routes were selected.	4	Comments are acknowledged. Route Option A1 remains the preferred route option at this stage.

7. PROJECT RESPONSES TO CONSULTATIONS

7.1 Overview

This part of the Report summarises how the project has responded to the consultation responses arising from the preferred route set out within the Elchies (Rothes III) Wind Farm Grid Connection Consultation Document. Responses to each of the points raised by stakeholders through the consultation process are included in Sections 5 and 6 above.

The consultation process for the project thus far has raised a number of comments requiring clarification or further assessment. These points include additional detail on the potential alignment, recommendations for continued consultation with stakeholders, and the importance of various surveys and assessments for protection of environmental aspects as the project evolves.

To address these points, the following actions are being undertaken:

- An overhead line engineering consultancy have been engaged by SHE Transmission plc. In addition to advising on alignment options, part of their brief will be to consider appropriate technological options along the route, as well as construction access solutions. The results of these studies will be reported at Alignment Selection (Stage 3);
- Further environmental survey and assessment work will be undertaken in parallel with the engineering studies to enable a collaborative approach to in seeking to identify an acceptable alignment through this sensitive landscape and environment. In particular, this will involve further survey effort and advice relating to landscape and visual, ecology, ornithology, hydrology, peat, soils, forestry and cultural heritage matters. The results of these studies will be reported at Alignment Selection (Stage 3); and
- Further consultation will be organised with key statutory and non-statutory consultees, local councillors and local communities to provide updates on the project during the alignment stage. Formal consultation will be organised on completion of the alignment studies to enable comments to be sought on the preferred alignment identified.

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

8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

The proposed Rothes III wind farm (capacity 99 MW) in Moray requires connection to the electricity transmission network at Blackhillock substation by June 2024. 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.

This Report on Consultation documents the consultation process which has been undertaken for the project between June and August 2020. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route option.

This report has described the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that Route Option A1 should be taken forward as the preferred route within which to identify alignment options. It is recognised that the preferred route runs through a sensitive environment with challenging terrain in places. However, it was selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will become the proposed route taken forward to the alignment stage of this project.

8.2 Next Steps

The project will now be taken into Stage 3 (Alignment Selection), commencing with identification of alignment options within the preferred route. These will be informed by this and further consultation exercises, and through detailed surveys, which may identify any additional and/or currently unknown engineering, environmental or land use constraints.

Scottish & Southern Electricity Networks

Legend

- Proposed Elchies Substation
- Blackhillock Substation
- Corridor
- Preferred Route
- Route Option Considered

N

0 0.5 1 2 3 km

Scale - 1:75,000

Project No: LT122

Project: Elchies Wind Farm Connection

Title: Figure 1: Preferred Route

Drawn by: TW Date: 26/08/2020

Drawing: 119012-D-ROC-PrefRo-1.0.0