



Code: UKCAL-CWF-CON-EIA-APL-00001-A009

Application Document 3

Onshore Planning Statement

Caledonia Offshore Wind Farm Ltd

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Application Document 3 Onshore Planning Statement

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Acronyms and Abbreviations

AMSC	Approval of Matters Specified in Conditions
BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plan
CO₂	Carbon Dioxide
CTMP	Construction Traffic Management Plan
DAS	Design and Access Statement
DE	Design Envelope
EIAR	Environmental Impact Assessment Report
EU	European Union
GHG	Greenhouse Gas
GW	Gigawatt
Ha	Hectare
HDD	Horizontal Directional Drilling
HRA	Habitats Regulation Appraisal
km	Kilometre
km²	Square kilometre
kV	KiloVolt
LDP	Local Development Plan
LPA	Local Planning Authority
LSE	Likely Significant Effect
LVIA	Landscape and Visual Impact Assessment
MD-LOT	Marine Directorate Licensing Operations Team

MLWS	Mean Low Water Springs
MSA	Mineral Safeguarding Areas
NETS	National Electricity Transmission Systems
NPF4	National Planning Framework 4
ONEC	Onshore Export Cable Corridor
OnTI	Onshore Transmission Infrastructure
OWF	Offshore Wind Farm
PAC	Pre-Application Consultation
PPP	Planning Permission in Principle
RIAA	Report to Inform Appropriate Assessment
RLB	Red Line Boundary
SAC	Special Areas of Conservation
SLA	Special Landscape Areas
SPA	Special Protection Areas
Sq.m	Square metre
SSEN-T	Scottish and Southern Energy Networks Transmission
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TJB	Transition Joint Bays
UK	United Kingdom

1 Introduction

1.1 Overview and Purpose

- 1.1.1.1 This Planning Statement ('the Statement') has been prepared on behalf of Caledonia Offshore Wind Farm Limited, ('the Applicant') in support of an application for Planning Permission in Principle (PPP) submitted to Aberdeenshire Council for the associated Onshore Transmission Infrastructure (OnTI) landward of Mean Low Water Spring (MLWS) that is required to export the power generated from the Caledonia Offshore Wind Farm (OWF) to the National Electricity Transmission Network (NETS).
- 1.1.1.2 Caledonia Offshore Wind Farm Limited is a wholly owned subsidiary of Ocean Winds.
- 1.1.1.3 The Caledonia OWF comprises, Caledonia North and Caledonia South, collectively referred to as the Proposed Development (Offshore). Separate offshore consents (Section 36 and Marine Licences) are sought for Caledonia North and Caledonia South.
- 1.1.1.4 The OnTI required to transfer the power from the Proposed Development (Offshore) to a connection to the NETS is referred to as the Proposed Development (Onshore).
- 1.1.1.5 Collectively, the Proposed Development (Offshore) and Proposed Development (Onshore) are referred to in this Statement as the "Proposed Development".
- 1.1.1.6 This Statement considers the Proposed Development (Onshore) in the context of the extant planning policy and guidance framework and material considerations. It demonstrates that the Proposed Development (Onshore) accords with the relevant planning policy tests and is acceptable in land use and planning terms.
- 1.1.1.7 Applications for planning permission are determined in accordance with the development plan, unless material considerations indicate otherwise, under Section 37(2A) of the Town and Country Planning (Scotland) Act 1997 (Scottish Parliament, 1997¹).
- 1.1.1.8 A single Environmental Impact Assessment Report (EIAR) has been submitted in support of the Proposed Development which encompasses the Proposed Development (Offshore) and the Proposed Development (Onshore). This Statement should be read in conjunction with the EIAR.

1.1.1.9 The planning application for the Proposed Development (Onshore) seeks PPP for the following components:

- Landfall Site;
- Onshore Export Cable Corridor (ONEC), over a total approximate length of 37 kilometres (km) from Landfall Site to the Onshore Substation Site);
- Onshore Substation Site, with two Onshore Substations co-located within the same footprint; and
- Onshore Grid Connection Cable Corridor (for Phase 1 only) (from the Onshore Substations to Grid Connection Point).

1.1.1.10 Figure 1-1 provides an indicative schematic of the overall Proposed Development and Figure 2-1 identifies the Proposed Development (Onshore) consent boundary, also referred to as the OnTI Red Line Boundary (RLB).

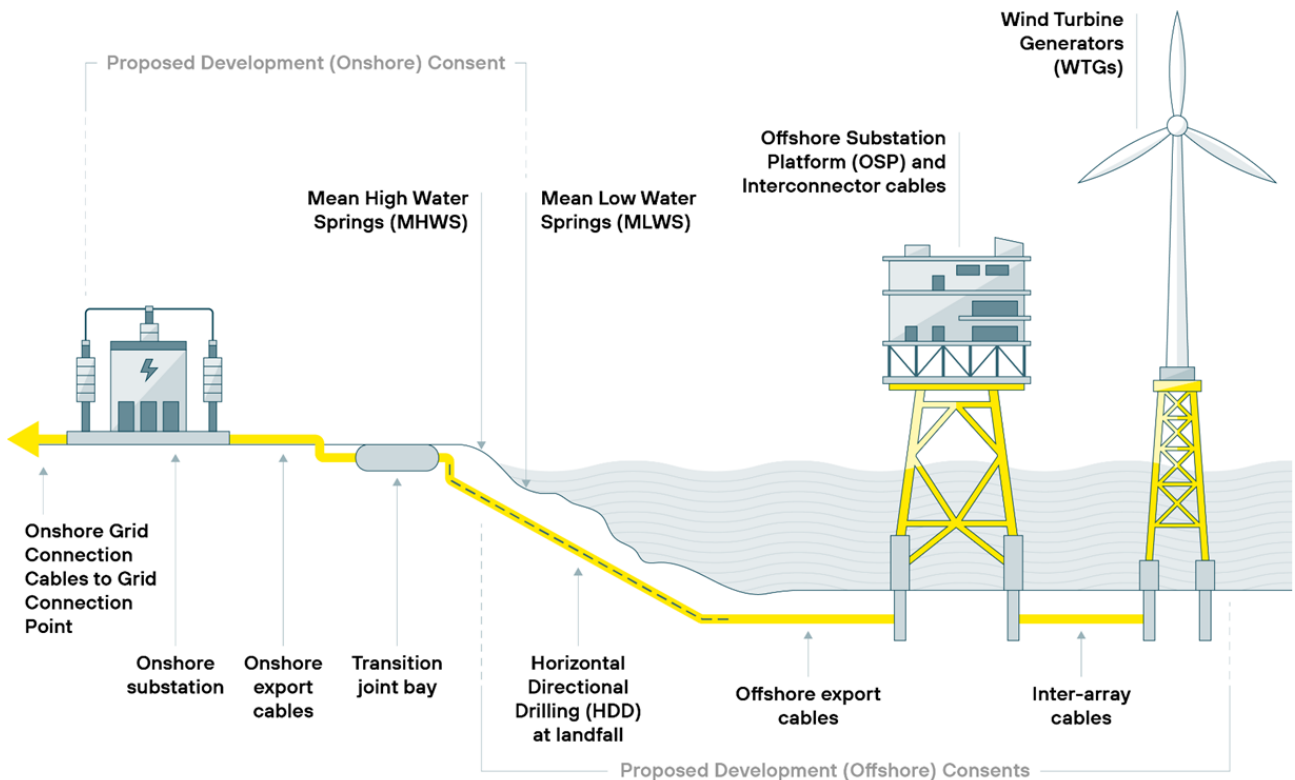


Figure 1-1: Proposed Development Indicative Schematic

1.2 Background

1.2.1 Overview

1.2.1.1 In January 2022, as part of the ScotWind leasing round, the Applicant was successfully awarded an Option Agreement granting exclusive rights to develop an OWF which is located within the outer Moray Firth, off the north-east coast of Scotland.

1.2.1.2 The OWF site was known as the NE4 Plan Option during the ScotWind Leasing process run by Crown Estate Scotland and subsequently named the Caledonia OWF via the newly incorporated limited company of Caledonia Offshore Wind Farm Limited (the Applicant). The 429 square kilometre (km²) site sits in the outer Moray Firth in the North of Scotland, immediately adjacent to the north-eastern boundary of the Moray East OWF.

1.2.1.3 The Applicant is progressing the proposals for Caledonia OWF. The terms of the Option Agreement are dependent upon the Applicant being awarded all key consents and permissions to construct and operate the OWF from the relevant regulatory authorities.

1.2.1.4 To make efficient use of the available grid capacity, the Applicant is seeking to retain the flexibility to deliver the OWF generation capacity across two phases. Aligned with this, the Proposed Development (Onshore) is seeking to consent the OnTI across two phases of construction works.

1.2.1.5 See Section 3 of this Statement and Volume 1, Chapter 5: Proposed Development Phasing of the EIAR for further detail in relation to the phased approach and grid connection.

1.2.2 Consenting Approach

1.2.2.1 To facilitate the development of the Caledonia OWF and support the deliverability of phasing, the Applicant is required to submit the following consenting applications:

- 2no. Section 36 applications under the Electricity Act 1989 (Caledonia North and Caledonia South) for the construction of the power generation site (offshore wind farm) and any inter-array cabling. To be submitted to the Marine Directorate Licensing Operations Team (MD-LOT).
- 4no. Marine Licence applications for any offshore platforms and cabling to the platforms and to shore, to be submitted to MD-LOT.
 - 2no. marine licence applications for generation; and
 - 2no. marine licence applications for Transmission.

- A PPP application under the Town and Country Planning Act 1997 submitted to Aberdeenshire Council for all onshore works (all works landward of MLWS).

1.2.2.2 These applications are supported by a single EIAR (covering the Proposed Development).

1.2.3 Need for the Proposed Development

1.2.3.1 The following key considerations, which relate to Scottish and United Kingdom (UK) energy policies, demonstrate the need for the Proposed Development:

- **Delivery of Scottish Government Energy Policy:** Scotwind is a primary component of the Scottish Government's Energy & Net Zero policy:

"Today, I would like to update Parliament on the outcome of the ScotWind Offshore Wind Leasing Round, a major milestone in our journey to Net Zero;

ScotWind will provide us with enough power for every home in Scotland, place Scotland at the forefront of the green hydrogen revolution and allow us to become a major exporter of clean energy."

(Michael Matheson, Cab Sec for Net Zero & Energy, Scottish Government Press Release 18 January 2022)."
- **Deliverability:** As one of the few ScotWind sites capable of early delivery using proven technology (fixed bottom foundations), the proposed development is a vital contributor to the Scottish and UK Government's energy policy targets.
- **Climate Change, Net Zero and Decarbonisation:** Both the Scottish Government and UK government have ambitious targets relating to climate change and net zero to mitigate the impacts of global climate change. The Proposed Development will contribute substantially to these targets through the generation of low-carbon renewable energy.
- **Security of Supply:** Energy security has become a greater concern in recent years following Covid, and Russia's invasion of Ukraine. These events highlighted the importance of energy independence from imported sources. Offshore wind is considered to be a key step in reducing Scotland's reliance on imported sources given the industry's maturity in Scotland.
- **Affordability of Supply:** Ensuring the energy is available to consumers at the lowest possible cost to ensure the highest quality of life. The Offshore Wind Policy (Scottish Government, 2020a²) statement states "Offshore wind is one of the lowest cost forms of electricity generation at scale, offering cheap, green electricity for consumers, with latest projects capable of generating power at below wholesale electricity prices". It is therefore considered the expansion of offshore wind will improve the affordability of supply for the UKs citizens.

- 1.2.3.2 The Proposed Development, in generating and exporting low-carbon renewable energy, will make an important contribution in helping to achieve the climate change policy aims and legislative requirements.
- 1.2.3.3 The Proposed Development will also contribute to Scotland and UK net zero targets as well as offshore wind overall delivery targets.

1.3 List of Plans and Documents

- 1.3.1.1 The following key plans and documents are submitted in support of the PPP application and provide key details of the Proposed Development (Onshore).
- 1.3.1.2 The suite of technical documents and drawings agreed with Aberdeenshire Council are as follows:
- Application Form;
 - Landowner/Agricultural Tenant Notification;
 - Location Plan;
 - Existing and Indicative Proposed Onshore Substation Site Plans;
 - Pre-Application Consultation (PAC) Report;
 - Design and Access Statement (DAS);
 - Planning Statement (this document);
 - EIAR and Non-Technical Summary;
 - Outline Drainage Impact Assessment;
 - Onshore Habitats Regulation Appraisal (Stage 2);
 - Biodiversity Enhancement Report;
 - Outline Peat Management Plan;
 - Outline Construction Traffic Management Plan (CTMP); and
 - Outline Construction Environmental Management Plan (CEMP).

1.4 Report Structure

1.4.1.1 The remainder of this Statement is structured as follows:

- Section 2 – Context;
- Section 3 – Proposed Development;
- Section 4 – Compliance with the regulatory and Policy Framework;
- Section 5 – Policy Assessment; and
- Section 6 – Conclusion.

2 Site Context

2.1.1.1 This section of the Statement provides context of the OnTI RLB for the Proposed Development (Onshore).

2.1.1.2 The OnTI RLB, in context, is shown on the Site Location Plan submitted to support the planning application as shown on Figure 2-1.

2.2 Administrative Boundaries

2.2.1.1 The OnTI RLB is located in Aberdeenshire, in north-east Scotland. The entirety of the OnTI RLB is situated within the administrative boundary of Aberdeenshire Council.

2.2.1.2 The northern extent of the OnTI RLB is within the parliamentary constituency of Banff and Buchan. The southern extent of the OnTI RLB is within the parliamentary constituency of Gordon.

2.3 Site Description

2.3.1.1 The Proposed Development (Onshore) is located along the north Aberdeenshire coast in the Banff/Whitehills area running in a south-easterly direction towards Burnside/New Deer. The nearest settlements from the OnTI RLB include Whitehills, Ladysbridge, Fintry and King Edward.

2.3.1.2 The OnTI RLB extents OS grid ref are: northern extremity OS Grid Ref: 363079 (easting) and 866080 (northing); southern extremity OS Grid Ref: 383512 (easting) and 844425 (northing); and centre point OS Grid Ref 373336 (easting) and 854110 (northing).

2.3.1.3 The OnTI RLB and its context are shown on the enclosed Site Location Plan, submitted as part of the application as shown on Figure 2-1. The OnTI RLB extends to 876.26 hectare (Ha) or 8,762,578.65 square metre (sq.m).

2.3.1.4 The OnTI RLB presented is larger than the area the OnTI will ultimately occupy. The parameters within the EIAR represent the largest possible spatial extents of the Proposed Development (Onshore) as a reasonable worst-case Design Envelope (DE). The exact location and arrangement of the Onshore Export Cable Circuits within the ONEC and the layout of the Onshore Substation Site will be determined at detailed design following further technical studies and subject to Approval of Matters Specified in Conditions (AMSC) applications.

2.4 Character and Surrounding Area

- 2.4.1.1 The character of the OnTI RLB ranges from coastal to rural but is predominantly characterised by both arable and grazed farmland with smaller areas of forestry, ancient woodland, residential properties, and farm steadings in the surrounding area. The land types cover Gently Undulating Coastal Farmland, Undulating Agricultural Heartland and Farmed and Wood River valleys.
- 2.4.1.2 Notable infrastructure includes the existing road network, electrical overhead lines and wind turbines which service local farms. The existing Scottish and Southern Electricity Networks - Transmission (SEN-T) New Deer Substation and Moray East Substation, is located adjacent to the Onshore Substation Site.

2.5 Designated Sites

- 2.5.1.1 The Cullen to Stake Ness Coast Site of Special Scientific Interest (SSSI) runs along the coastline and within the OnTI RLB. No other areas of Statutory or Non-statutory Designated Sites are present within the OnTI RLB. There are four European designated sites within 20km of the Onshore Scoping Area; Moray Firth Special Protection Areas (SPA), Reidside Moss Special Areas of Conservation (SAC), Troup, Pennan and Lion's Heads SPA and Turclossie Moss SAC.

2.6 Allocated Sites

- 2.6.1.1 There are no opportunity sites, retail centres, existing employment land or strategic reserved employment land designated within the Aberdeenshire Council Local Development Plan (LDP) 2023 (Aberdeenshire Council, 2023)³ within the OnTI RLB. There are small pockets of land in proximity to the OnTI RLB allocated under the Aberdeenshire Local Development Plan 2023, including Protected / Reserved Sites and Opportunity Sites at Ladysbridge and Whitehills (as outlined in Appendix 7a Banff and Buchan Settlement Statement of the Aberdeenshire LDP⁴).
- 2.6.1.2 Further descriptive details of the Proposed Development (Onshore) and existing land uses are provided within the EIAR in Volume 5, Chapter 2: Land Use.

2.7 Cultural Heritage

2.7.1.1 There are no designated heritage assets within the OnTI RLB.

2.7.1.2 Within 500m of the OnTI RLB, there are:

- Two Scheduled Monuments;
- 15 Listed Buildings (one Category A, 13 Category B and one Category C);
- One Conservation Area (Whitehills Conservation Area); and
- One Inventory Garden and Designed Landscape (Hatton Castle, GDL003993).

2.7.1.3 Within 5km of the Onshore Substation Site, there is:

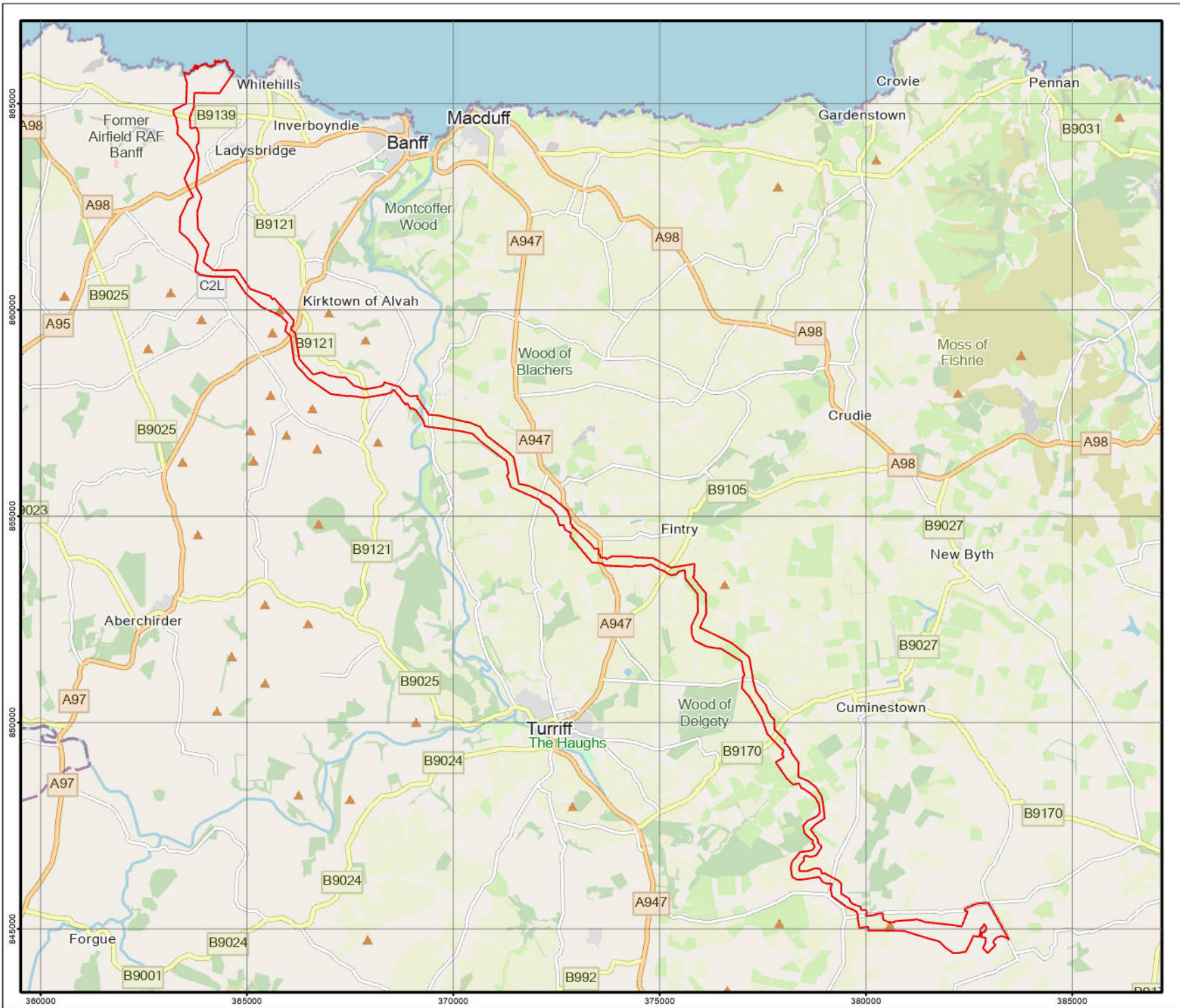
- One Scheduled Monument (North Main of Auchmaliddie (SM9392));
- Two Category C Listed Buildings, namely Cairnbanno House (LB16160) and Millbren Church (LB9629); and
- One Inventory Garden and Designed Landscape (GDL00399) at Hatton Castle.


2.7.1.4 There are no World Heritage Sites or Battlefields within the OnTI.

2.7.1.5 There are non-designated heritage assets broadly from the Prehistoric, Early Medieval, Medieval, Post-medieval and Modern periods within 500m of the OnTI RLB. The majority of assets recorded by the Aberdeenshire Historic Environment Record either date to the Prehistoric or Post-medieval periods.

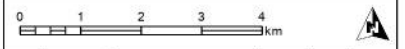
2.8 Site Ownership

2.8.1.1 The OnTI RLB extent is owned by a mix of estate, farm and residential ownerships. The Applicant owns the Onshore Substation Site land in relation to the Proposed Development (Onshore).



 Onshore Transmission Infrastructure Red Line Boundary

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03	30/08/2024	Approved	CW	GS	GS
02	22/07/2024	For Review	CW	GS	EC
01	04/03/2024	For Review	MM	GS	EC
REV	DATE	DOC STATUS	ORIGIN	REVIEW	APP



CONTRACTOR DRAWING NO: UKCAL1_ARP_WNF_ENV_MAP_00546
 CONTRACTOR REV: 03

GEODETIC PARAMETERS: OSGB36 / British National Grid (EPSG:27700)

DRAWING TITLE: **Figure 2-1:
Proposed Development (Onshore)
Red Line Boundary**

STATUS: Approved	SCALE: 1:125,000
DRAWING NUMBER: N/A	SHEET NO: 01 of 01
	REV: N/A

2.9 Pre-application Consultation process

- 2.9.1.1 There is a Planning Processing Agreement in place for the Proposed Development (Onshore) and associated PPP application with Aberdeenshire Council, the Local Planning Authority (LPA). This has involved extensive engagement with the LPA and technical stakeholders throughout the development of this application.
- 2.9.1.2 A formal pre-application advice response for the Proposed Development (Onshore) was provided by Aberdeenshire Council on 18 April 2024. The following points were covered in the response which are addressed throughout this Statement:
- Supporting Information Requirements.
 - Planning Policy and Guidance.
 - Summary of advice in relation to key issues:
 - Principle of Development;
 - Landscape and Visual Impact (both individually and cumulative);
 - Ecology;
 - Biodiversity Net Gain;
 - Built and Cultural Heritage;
 - Traffic and Transport;
 - Hydrology and Flood Risk;
 - Contaminated Land; and
 - Noise.
- 2.9.1.3 A comprehensive approach to stakeholder engagement and public consultation has been undertaken to help inform the proposals for the Proposed Development (Onshore).
- 2.9.1.4 Public consultation has been undertaken to inform the development of this planning application at key stages; first consultation events (Offshore: November 2022 to February 2023 and Onshore: June 2023) and further feedback events (Onshore and Offshore April to June 2024). The PAC Report (Application Document 1) submitted in support of this application summarises the pre-application process, responses received and how the design has developed in response.

3 Proposed Development

3.1 Proposed Development Description

- 3.1.1.1 The purpose of the OnTI will be to supply power generated by the Caledonia OWF to the NETS onshore. The power will be transmitted as a High Voltage Alternating Current .
- 3.1.1.2 To enable this, the following infrastructure, collectively referred to as the Proposed Development (Onshore), is proposed:
- The Landfall Site: the area from MLWS where the Offshore Export Cable Circuits are connected to the Onshore Export Cable Circuits, via Horizontal Directional Drilling (HDD) ducts, within TJB (buried box-like structures which house the jointing between the Offshore and Onshore Export Cable Circuits). The Landfall Site is located at Stake Ness, 1km west of the village of Whitehills and approximately 5km west of Banff.
 - The ONEC: where the Onshore Export Cable Circuits would be located which connects the TJBs at the Landfall Site to the Onshore Substation Site. The ONEC, extends approximately 37km from Stake Ness to an area in the vicinity of the existing New Deer Substation.
 - The Onshore Substation Site: comprising two co-located Onshore Substations located adjacent to the existing New Deer substation. These are required to transform the power before feeding it into the NETS at the Grid Connection Point; and
 - The Onshore Grid Connection Cable Corridor: connecting the Onshore Substation to the Grid Connection Point at the existing New Deer Substation (for Phase 1) (owned by SSEN-T), via up to two onshore cable circuits with a nominal voltage of 400 kiloVolt (kV).
- 3.1.1.3 Further descriptive details are contained within the EIAR in Volume 1, Chapter 4: Proposed Development Description (Onshore).
- 3.1.1.4 Should PPP be granted, the details of the final design of each component of the Proposed Development (Onshore) are proposed to be agreed with Aberdeenshire Council through the approval of AMSC applications.

3.2 Grid Connection Point

- 3.2.1.1 Phase 1 of the Proposed Development is expected to connect to the NETS at the existing New Deer substation.

3.2.1.2 This EIA does not consider the Onshore Grid Connection Cable Corridor for the Proposed Development's second phase, which will be required to connect the Onshore Substation to Greens. This is because the preferred location of the Greens substation was only confirmed in late January 2024ⁱ. Resultingly, the design of the 400kV connection for the Proposed Development's second phase from the Onshore Substation into Greens is still under development. Consequently, this EIA does not consider the Onshore Grid Connection between the Onshore Substation Site and the NETS for Phase 2 of the Proposed Development and this will be subject to a separate planning application. Consequently, this EIA does not consider the Onshore Grid Connection between the Onshore Substation Site and the NETS for Phase 2 of the Proposed Development, and this will be subject to a separate planning application.

3.3 Development Phasing Approach

3.3.1.1 As per EIAR Volume 1, Chapter 5: Proposed Development Phasing, the Proposed Development is being brought forward in a phased manner as a result of a grid capacity availability.

3.3.1.2 As a result, the Proposed Development (Offshore) has been split into Caledonia North and Caledonia South, with separate Section 36 consents sought for each (Caledonia North and Caledonia South).

3.3.1.3 The approach to the consenting of the Proposed Development (Onshore) aligns with the phased offshore application strategy, and therefore considers two onshore construction phases to align with the delivery of the Caledonia North and Caledonia South offshore phases. These are as follows:

- Phase 1: Landfall Site, ONEC, 1 x Onshore Substation and Onshore Grid Connection Cable Corridor; and
- Phase 2: Landfall Site, ONEC, 1 x Onshore Substation and Onshore Grid Connection Cable Corridor.

ⁱ See Proposal of Application Notice on the Aberdeenshire Council planning portal, ref: ENQ/2024/0139

- 3.3.1.4 Figure 3-1 provides an indicative cross section of the ONEC and the works undertaken for each phase. Figure 3-2 provides an indicative plan of the phasing of the Onshore Substation Site.
- 3.3.1.5 The two onshore phases would be brought forward under one of the following construction scenarios:
- Sequential – Construction of Phase 1; a gap of up to five years and then the build out of Phase 2. An Onshore Grid Connection Cable Corridor will be required for Phase 2 but may be subject to a separate planning application; and
 - Concurrent – Construction of both phases at the same time. This scenario may be progressed if external factors make it the most economical, timely and least impactful solution. For example, to address any potential situation where there is a delay to the NETS reinforcement works impacting the first phase of works.
- 3.3.1.6 The Applicant is also exploring the feasibility of undertaking targeted enabling works for Phase 2 at Phase 1. The following scenario has been included in the assessment (where it is deemed to be material) to ensure it has been assessed should it be possible to implement, however:
- Enabling – Construction of Phase 1 and enabling works for Phase 2 including HDD at the Landfall Site, trenching of ONEC, laying of ducts and construction of the platform for substation 2. A gap of up to five years and the remaining Phase 2 construction works of a cable pull at the Landfall Site, installation of haul road, cable pull along the ONEC and construction and electrical commissioning of the Phase 2 Onshore Substation.
- 3.3.1.7 Refer to EIAR Volume 1, Chapter 5: Proposed Development Phasing for further details.

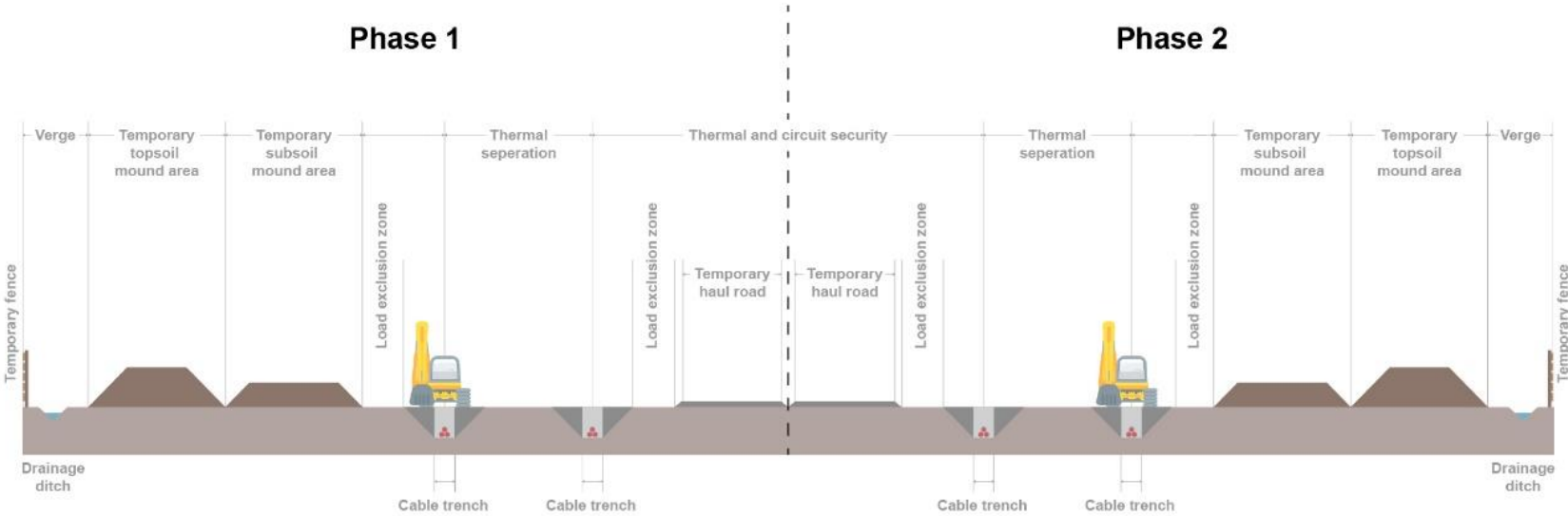


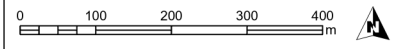
Figure 3-1: Indicative Cross Section of the Onshore Export Cable Corridor



- Onshore Transmission Infrastructure Red Line Boundary
- Substation A
- Substation B
- Indicative Permanent Onshore Substations Access

*The precise order and timescale in which the Onshore Substations will be constructed will be determined at a later stage depending on the construction programme and phasing scenario adopted.

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01	07/10/2024	Approved	CW	BD	EC
REV	DATE	DOC STATUS	ORIGIN	REVIEW	APP



CONTRACTOR DRAWING NO: UKCAL1_ARP_WNF_ENV_MAP_00606
 GEODETIC PARAMETERS: OSGB36 / British National Grid (EPSG:27700)
 CONTRACTOR REV: 01

**Figure 3-2:
Onshore Substation Site Phasing**

STATUS: Approved	SCALE: 1:10,000
DRAWING NUMBER: N/A	SHEET NO: 01 of 01 REV: N/A

3.4 Planning Permission Conditions

3.4.1.1 The decision on which of the three construction scenarios will be enacted will not be made until a point after the determination of this PPP application.

3.4.1.2 It is therefore, important that any grant of PPP retains the flexibility for the Applicant to choose, post determination, which phasing scenario is implemented. As such the following approach is suggested:

- Any grant of PPP should include a Reserved Matters Condition requiring the submission and agreement of a detailed phasing plan which will align with one of the above delivery scenarios; and
- All reserved matters requiring the submission of an application are tied specifically to each phase.

3.4.1.3 The inclusion of planning conditions as suggested would allow each subsequent “reserved matter” to be addressed as relevant to the development phase in question and avoiding the need, for example, to address all suspensive conditions before commencement of Phase 1.

3.4.1.4 This suggested use of planning would also comfortably adhere to each of the “six tests” specified by Planning Circular 4/1998: the use of conditions in planning permissions (Scottish Government, 1998⁵), namely:

- Necessary;
- Relevant to planning;
- Relevant to the development being permitted;
- Enforceable;
- Precise; and
- Reasonable in all other aspects.

4 Compliance with the Regulatory and Policy Framework

- 4.1.1.1 A full review of the relevant planning legislation and policy associated with the Proposed Development (Onshore) is provided in the EIAR, Volume 1, Chapter 2: Legislation and Policy. The EIAR topic specific chapters submitted with this application include a comprehensive assessment of the Proposed Development in accordance with environmental policy and legislation.
- 4.1.1.2 Design and access related policies are assessed in relation to the Proposed Development (Onshore) in the DAS submitted with this application (Application Document 2).
- 4.1.1.3 This section focuses on the relevant planning legislation and policy documents considered as part of this planning application.

4.2 Relevant Legislation

4.2.1 Town and Country Planning Act 1997

- 4.2.1.1 The primary legislation setting the structure of the terrestrial planning system, which extends inland from MLWS, is the Town and Country Planning (Scotland) Act 1997 ("the 1997 Act") (Scottish Parliament, 1997)⁶. This Act governs the day-to-day operation of the planning system in Scotland and seeks to ensure that future development and use of land is sustainable. Its primary objectives are to promote sustainable economic development, encourage regeneration and to maintain and enhance the quality of the natural heritage and built environment.
- 4.2.1.2 Section 28 (1) of the 1997 Act requires planning permission to be obtained for the "development" of land. What amounts to "development" is defined in Section 26, as the "carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land".
- 4.2.1.3 Section 26A of the 1997 Act defines the three categories in the hierarchy of development to which all developments will be allocated: -
- national development;
 - major development; and
 - local development.
- 4.2.1.4 It outlines that the National Planning Framework may describe types of national developments or designate specific sites.

- 4.2.1.5 The Proposed Development (Onshore) would be classified as a 'national' development under the NPF4 (Scottish Government, 2023)⁷ (as outlined in Section 4.5.2).
- 4.2.1.6 Consent for the Proposed Development (Onshore) is being sought via an application for PPP for a national development, in accordance with the 1997 Act to Aberdeenshire Council.

4.2.2 The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

- 4.2.2.1 The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (Scottish Parliament, 2013⁸) set out in detail the requirements/procedure at each stage of the development management process, from pre-application through to post decision, as relevant to both the Applicant and the determining authority.
- 4.2.2.2 These regulations were amended by the Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021 (Scottish Parliament, 2021⁹). This changes some of the consultation activities required.
- 4.2.2.3 The pre-application process, application preparation and submission of the Proposed Development (Onshore) planning application has been progressed in accordance with the stipulations of these regulations and relevant amendments. The PAC Report (Application Document 1) submitted with this application outlines the process in line with the requirements.

4.3 Key Environmental Legislation

4.3.1 EIA Development

- 4.3.1.1 Requirements for EIA were defined in the EIA Directive (2011/92/EU¹⁰, as amended by Directive 2014/52/EU¹¹) which were transposed into Scottish law. The purpose of the EIA Directive was to ensure that the potential effects of a project on the environment are taken into consideration before relevant consents are granted. Following the UK's departure from the European Union (EU) on 31 December 2020, the UK is no longer an EU Member State. Amendments have therefore been made to EIA Regulations so that they continue to be effective and maintain the same standards of protection now that the UK is no longer part of the EU. The EIA Regulations continue to apply in substantially the same way as they did before the UK's departure from the EU.

- 4.3.1.2 If a development is deemed to have the potential to have a significant effect on the environment by virtue of its scale, size and location, then an EIA is required. The competent authority could not grant consent for an EIA development without taking into account the EIAR.
- 4.3.1.3 The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations 2017) (Scottish Parliament, 2017¹²) set out the criteria of development that are to be considered as 'EIA development'. Regulation 6 of the Regulations considers that a development is an EIA development where either the LPA or Scottish Government has issued a Screening Opinion or Direction that the development is an EIA development, or an EIAR is issued to the determining authority by an applicant or where an applicant elects that it is EIA development.
- 4.3.1.4 This PPP application is supported by an EIAR, which is intended to clearly inform stakeholders of any likely significant effects (LSE), mitigation measures and residual effects expected to result from the Proposed Development.
- 4.3.1.5 The scope of the EIAR was agreed with stakeholders, and a Scoping Report was issued to Aberdeenshire Council in December 2022 (Volume 7, Appendix 1: Onshore Scoping Report). The Onshore Scoping Report considered all activities associated with the OnTI extending landwards from MLWS. This included the Landfall Site, ONEC, Onshore Substation and associated ancillary infrastructure. A formal Scoping Opinion was received from Aberdeenshire Council in February 2023 (Volume 7, Appendix 4: Onshore Scoping Opinion).
- 4.3.1.6 The following effects are assessed in the relevant chapters of Volume 5 and Volume 6 of the EIAR in relation to the Proposed Development (Onshore):
- Volume 5, Chapter 2: Land Use;
 - Volume 5, Chapter 3: Terrestrial Ecology and Biodiversity;
 - Volume 5, Chapter 4: Landscape and Visual;
 - Volume 5, Chapter 5: Terrestrial Archaeology and Cultural Heritage;
 - Volume 5, Chapter 6: Hydrology and Hydrogeology;
 - Volume 5, Chapter 7: Geology, Soils and Contaminated Land;
 - Volume 5, Chapter 8: Airborne Noise and Vibration;
 - Volume 5, Chapter 9: Traffic and Transport;
 - Volume 6, Chapter 2: Socio-Economics, Recreation and Tourism;
 - Volume 6, Chapter 3: Climate Change Resilience;
 - Volume 6, Chapter 4: Greenhouse Gases; and
 - Volume 6, Chapter 5: Intertidal Assessment.

4.3.2 EIA Alternatives

- 4.3.2.1 Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (Scottish Parliament, 2017¹³) requires an EIAR to provide a reasonable description of the 'alternatives' studied by the developer, which are relevant to the project.
- 4.3.2.2 The site selection process and geographical alternatives considered, taking account of the potential environmental effects are presented in EIAR, Volume 1, Chapter 6: Site Selection and Alternatives.
- 4.3.2.3 The site selection process followed a robust process of the utilisation of desk based assessments to identify the initial potential Proposed Development (Onshore) component options. The Applicant has then sought to verify desk based information obtained to inform these assessments though the undertaking of surveys and additional assessments to 'ground truth' desktop information.
- 4.3.2.4 Site selection and the Proposed Development (Onshore) design has also taken into account Schedule 9 of the Electricity Act 1989 (UK Parliament, 1989¹⁴). Within Schedule 9 a duty is placed on those holding an electricity generation licence to have regard to the preservation of amenity. Schedule 9 requires the relevant licence holder when formulating proposals in connection with the generation and transmission of electricity to take account of the effects the proposals would have on the natural beauty of the countryside, on any flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest.
- 4.3.2.5 Volume 1, Chapter 6: Site Selection and Alternatives notes that for the purpose of identifying the Onshore Export Cable Route and Onshore Substation layouts, design refinements will continue post PPP being granted through the detailed design and routing processes.
- 4.3.2.6 Accordingly, it is considered the requirements of Schedule 4 have been met for this PPP application. Should PPP be granted, upon submission of applications for AMSC, the Applicant will set out how design refinements have been further considered and have informed the detailed design and routing approach.

4.3.3 EIA and Phasing – Rochdale Envelope Approach

- 4.3.3.1 The Proposed Development's need for flexibility, as outlined in Section 2, must be balanced with the requirement to assess its LSEs on the environment. As a result, in accordance with the Rochdale Envelope approach and Scottish Government guidance on the use of a DE (Scottish Government, 2022¹⁵) the EIAR has utilised a DE approach (also known as the Rochdale Envelope approach), which involves the identification of the worst case assessment scenario for each impact assessed.

- 4.3.3.2 This approach enables the consideration within the assessment of the scenario that would result in the greatest impact (e.g., largest footprint, longest exposure, or largest dimensions). Unless otherwise identified it can then be assumed that any other (lesser) scenario for that impact would result in no greater significance than that assessed in the EIA.
- 4.3.3.3 Each topic specific assessment within the EIAR has considered factors such as overall length of construction activities, the likelihood for impacts to the same receptor to occur across two phases of works, and the intensity and location of construction activities to determine the worst-case scenario.
- 4.3.3.4 The determination of a worst-case scenario does not consider spatial extents given the Proposed Development (Onshore) footprint remains the same across all scenarios. The worst-case construction scenarios for each topic specific assessment are identified within each EIAR chapter.

4.3.4 Habitats Regulations

- 4.3.4.1 For Scotland's terrestrial environment, the requirements of the Habitats and Birds Directives (92/43/EEC¹⁶ and 2009/147/EC¹⁷ respectively) were largely transposed into domestic legislation by the Conservation (Natural Habitats. & c.) Regulations 1994 (UK Government, 1994¹⁸), The Conservation of Habitats and Species Regulations 2017 (UK Government, 2017a¹⁹) and the Wildlife and Countryside Act 1981 (UK Government, 1981²⁰) (collectively referred to as the 'Habitats Regulations').
- 4.3.4.2 Despite the UK's departure from the EU in 2020, the Habitats Regulations, detailed above, remain in force and continue to provide the legislative framework for habitat regulation assessments.
- 4.3.4.3 The Habitats Regulations require a Habitats Regulations Appraisal (HRA) to be conducted prior to a plan, project or activity being granted consent where there is potential for the development to have a LSE on a European site. In accordance with the Habitats Regulations, and the HRA process, where HRA screening has identified an LSE on a European site, the applicant is required to produce a RIAA. The RIAA provides information to inform an appropriate assessment to be undertaken by the competent authority.
- 4.3.4.4 HRA Screening has been undertaken to identify designated sites that are protected for their conservation interests and their qualifying features that have potential connectivity to the Proposed Development (Offshore) and the Proposed Development (Onshore). Refer to Application Document 12: Proposed Development (Offshore) Habitat Regulations Appraisal Stage 1 Screening Report and Application Document 10: Proposed Development (Onshore) Habitat Regulations Appraisal Stage 1 Screening Report to assess whether LSE to these designated sites from potential impacts could be ruled out.

- 4.3.4.5 A RIAA for the Proposed Development (Onshore) and the Proposed Development (Offshore) where potential LSE could not be ruled out has also been undertaken (refer to Application Document 13: Caledonia North Report to Inform Appropriate Assessment, Application Document 14: Caledonia South Report to Inform Appropriate Assessment and Application Document 11: Proposed Development (Onshore) Report to Inform Appropriate Assessment). The RIAA assesses whether the Proposed Development will have an adverse effect on site integrity of the designated sites screened in for assessment in order to fulfil the requirements of HRA.
- 4.3.4.6 The HRA process has been progressed alongside the EIA but is reported upon separately. The EIA and HRA have drawn from, and cross referenced, similar ecological information.

4.4 Other Consents

- 4.4.1.1 Whilst this application is seeking PPP for the Proposed Development (Onshore), it is acknowledged that other consents or procedures are required for some of the works to support the delivery of the OWF. These are described below.
- 4.4.1.2 As highlighted in Section 1 and detailed within EIAR Volume 1, Chapter 1: Introduction, the Applicant requires the following consents in relation to the proposed infrastructure and associated works:
- Two consents under Section 36 of the Electricity Act 1989²¹ for the OWF generating stations, specifically for Caledonia North and Caledonia South;
 - Four marine Licence applications under the provisions of Part 4 of the Marine (Scotland) Act 2010 (Scottish Parliament, 2010²²) and Part 4 of the Marine and Coastal Access Act 2009 (UK Parliament, 2009²³) broken down below:
 - Two marine licences for the generating stations to allow for the construction of each wind farm infrastructure:
 - one applicable to Caledonia North; and
 - one applicable to Caledonia South; and
 - Two marine licences for the construction of the Offshore Transmission Infrastructure (OfTI) assets:
 - one applicable to Caledonia North; and
 - one applicable to Caledonia South.
 - One PPP application for the OnTI, under the Town and Country Planning (Scotland) Act 1997 (as amended) (Scottish Parliament, 1997²⁴).

- 4.4.1.3 Additionally, several other environmental consents and licences may be required:
- European Protected Species Licences;
 - Basking Shark licences;
 - Safety zones;
 - Decommissioning for renewable energy installation in Scottish Waters; and
 - Controlled activities regulations for proposed engineering works within the water environment.

4.4.1.4 Volume 1, Chapter 2: Legislation and Policy of the EIAR details the consenting process and requirements for each of these consents in more detail.

4.5 Relevant Plans and Policy

4.5.1.1 This section highlights the plans and policies relevant to the determination of PPP application for the Proposed Development (Onshore).

4.5.2 The National Planning Framework

4.5.2.1 The fourth National Planning Framework (NPF4) (Scottish Government, 2023b²⁵) was adopted by the Scottish Government on 13 February 2023.

4.5.2.2 NPF4 comprises three parts:

- National Spatial Strategy – a shared vision where each part of Scotland can be planned and developed to create: Sustainable, Liveable, Productive places;
- National Planning Policy – detailed national policy on a full range of planning topics; and
- Annexes – National Development Statements of Need, Spatial Planning Priorities, Six Qualities of Successful Places, the Minimum All-Tenure Housing Land Requirement for each planning authority in Scotland, along with a Glossary of terms and Acronyms.

4.5.2.3 NPF4 places significant emphasis on the global climate emergency and the nature crisis. At the core of NPF4's responses to these twin crises is the need for Scotland to decarbonise its energy. NPF4 states that "the global climate emergency and the nature crisis formed the foundations for the spatial strategy as a whole".

4.5.2.4 NPF4 sets out the long-term spatial strategy for Scotland and national planning policies as part of the statutory Development Plan. NPF4 contains six overarching spatial principles:

- Just Transition;
- Conserving and recycling assets;
- Local living;
- Compact urban growth;
- Rebalanced development; and
- Rural revitalization.

4.5.2.5 NPF4 applies these spatial principles outlining the national spatial strategy which supports the planning and delivery of place-based outcomes, namely sustainable places, liveable places and productive places.

4.5.2.6 Given the focus of NPF4 on the climate crisis and what planning and development can do to achieve a net zero, sustainable Scotland by 2045, it is evident that a drive to increase offshore wind energy features heavily throughout.

4.5.2.7 As such NPF4 directs determining authorities to give significant weight towards the contribution that a proposal will make towards the push to net zero.

National Development

4.5.2.8 NPF4 designates 18 national developments which will support the delivery of the spatial strategy.

4.5.2.9 Annex B- National Developments Statements of Need, states that “National developments are significant developments of national importance that will help to deliver our spatial strategy”. Although the designation of a national development does not grant planning permission for any development proposal it does mean that the principle of the development is supported.

4.5.2.10 The Proposed Development (Onshore) meets the criteria of a National Development, as set out by NPF4 Part 3. Section 3: Strategic Renewable Electricity Generation Transmission Infrastructure. Specifically, that a development within one or more of the Classes of Development described below is designated a national development:

- a) On and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

- b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132 kV or more; and) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations. Table 4-1 provides an overview of the key policies of NPF4 pertinent to the Proposed Development (Onshore).

Table 4-1: NPF4 Policies Appraisal

Policy	Overview
Policy 1: Tackling the climate and nature crises	This policy intends to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. In the consideration of development proposals significant weight will be given to the global climate and nature crises.
Policy 3: Biodiversity	This policy aims to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. The policy aims to ensure that developments of the scale of the proposed development will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.
Policy 4: Natural Places	<p>This policy aims to protect, restore and enhance natural assets making best use of nature-based solutions with development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.</p> <p>Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence.</p>
Policy 5: Soils	<p>This policy aims to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.</p> <p>Policy 5 (b) states that development proposals on prime agricultural land, or lesser quality that is culturally or locally important for primary use will only be supported where it is for, (iv).“the generation of energy from renewable sources...</p>

Policy	Overview
	<p>This demonstrates the significant weight of increasing renewable energy sources.</p>
<p>Policy 6: Forestry, woodland and trees</p>	<p>This policy aims to protect and expand forests, woodland and trees. Policy 6 states “Development proposals that enhance, expand and improve woodland and tree cover will be supported.</p> <p>Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy; iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy; iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.</p> <p>Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered. d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.</p>
<p>Policy 7: Historic assets and places</p>	<p>Aims to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.</p> <p>Policy 7 (k) states “Development proposals at the coast edge or that extend offshore will only be supported where proposals do not significantly hinder the preservation objectives of Historic Marine Protected Areas”.</p>

Policy	Overview
Policy 10: Coastal development	<p>Aims to protect coastal communities and assets and support resilience to the impacts of climate change.</p> <p>Policy 10 (b) states in relation to development proposals in undeveloped coastal areas, they will be supported where they:</p> <ul style="list-style-type: none"> i. are necessary to support the blue economy, net zero emissions or to contribute to the economy or wellbeing of communities whose livelihood depends on marine or coastal activities, or is for essential infrastructure, where there is a specific locational need and no other suitable site; ii. do not result in the need for further coastal protection measures taking into account future sea level change; or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems; and iii. are anticipated to be supportable in the long-term, taking into account projected climate change; or iv. are designed to have a very short lifespan.
Policy 11: Energy	<p>This policy aims “to encourage, promote and facilitate all forms of renewable energy development onshore and offshore”. This includes transmission and distribution infrastructure to support energy generation.</p> <p>Development proposals will only be supported where they maximise net economic impact. Policy 11 (e) (i.-xiii.) summarises impacts which must be considered during the project design and proposed mitigations which include, but not limited to, impacts to public access, biodiversity, and cumulative impacts.</p> <p>In considering the impacts set out in Policy 11 (e) (i.-xiii.), significant weight will be placed on the Proposed Developments contribution to renewable energy targets and emission reduction targets.</p>
Policy 18: Infrastructure first	<p>This policy aims to “encourage, promote and facilitate an infrastructure first approach to land-use planning, which puts infrastructure considerations at the heart of placemaking.”</p> <p>Policy 18 (a) indicates that development proposals which align with the relevant LDP and associated delivery programme will be supported.</p> <p>Policy 18 (b) furthermore indicates that any impacts of a proposed development on existing infrastructure will only be</p>

Policy	Overview
	<p>supported “where it can be demonstrated that provision is made to address the impacts on infrastructure.” This can include appropriate planning conditions and obligations which meet the relevant tests.</p>
<p>Policy 22: Flood risk and water management</p>	<p>Aims to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.</p>
<p>Policy 23: Health and safety</p>	<p>This policy aims to “protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.”</p> <p>Policy 23 summarises the types of acceptable developments and outlines the necessary assessments for mitigating any impacts to health and safety.</p> <p>Policy 23 (d) indicates that an air quality assessment may be necessary and that development proposals should consider how to improve air quality and reduce exposure to poor air quality.</p> <p>Policy 23 (e) addresses noise impacts and indicates that the agent of change principle is to be applied to noise sensitive development and where necessary, a Noise Impact Assessment should be undertaken if effects are likely.</p>
<p>Policy 25: Community wealth building</p>	<p>This policy aims to “encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels.” It aims to ensure that proposed developments contribute tangible economic benefits to communities and places.</p> <p>Policy 25 (a) indicates that development proposals should align with local and regional community wealth building strategies and local economic priorities.</p>

4.5.3 Aberdeenshire Local Development Plan

- 4.5.3.1 The Aberdeenshire Local Development Plan (LDP) (Aberdeenshire Council, 2023²⁶) was formally adopted on 13th January 2023 and has been written to accord with the National Planning Framework 3 (Scottish Government, 2014²⁷) and be consistent with the Aberdeen City and Shire Strategic Development Plan 2020 (Aberdeenshire Council, 2020²⁸).
- 4.5.3.2 The Shire Strategic Development Plan 2020 and NPF3 have now been superseded by NPF4 and as such in the event of any incompatibility between a provision of NPF4 and a provision of the LDP, NPF4 will take priority.
- 4.5.3.3 The LDP directs decision-making on all land-use planning issues and planning applications in Aberdeenshire, sets out broad principles for development in the area and sets out planning policies.
- 4.5.3.4 Table 4-2 provides an overview of the key LDP policies pertinent to the Proposed Development (Onshore).

Table 4-2: Aberdeenshire LDP Policy Appraisal

Policy	Overview
Policy R1 Special Rural Areas	Coastal zone development must have clear social, economic, environmental and community benefits to be approved and that coastal habitats should be protected.
Policy R2 Development Proposals Elsewhere in the Countryside	Developments in the countryside which utilise brownfield land are preferred to sites which utilise greenfield land.
Policy P1 Layout, Siting and Design	Applies the six qualities of successful place to proposals for single buildings and small-scale development. Including: distinctive, safe and pleasant, welcoming, adaptable, efficient and well-connect. It provides detailed design guidance for individual building proposals.
Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land	Developments which present a risk of significant pollution, nuisance or danger to the public or environment will not be supported. Furthermore developments on contaminated land will not be supported unless site investigations and remedial actions are proposed.

Policy	Overview
	<p>If an Air Quality Assessment or a Noise Impact Assessment identifies significant impacts then appropriate mitigation measures must be proposed.</p>
<p>Policy E1 Natural Heritage</p>	<p>Outlines that new development on Nature Conservation sites will not be supported unless the impacts can be clearly outweighed by other social, environmental and economic benefits and any impacts are appropriately mitigated in line with the relevant legislation and guidance.</p> <p>With regards to Protected Species, developments must avoid unacceptable detrimental impact on species that may exist on or adjacent to the site. In accordance with the Wildlife and Countryside Act a development with significant impact on protected species will not be improved unless there is significant social, economic and environmental benefits.</p> <p>Policy E1 indicates that a baseline ecological survey must be carried out where there is evidence of habitats, geological features or species of importance. The development must be designed to avoid impacts where possible, enhance ecological net gain and impacts cannot be avoided be clearly outweighed by public benefits.</p>
<p>Policy E2 Landscape</p>	<p>Aims to ensure that Special Landscape Areas (SLAs) are afforded adequate protection against inappropriate development. It supports the criteria of Policy P1 when applying the six qualities of successful place.</p>
<p>Policy E3 Forestry and Woodland</p>	<p>Aims to protect and safeguard forestry and woodland in Aberdeenshire with a "presumption against the removal of safe and healthy trees, non-commercial woodlands and hedgerows." If a proposed development is required to be removed, then relevant national criteria shall be used to determine acceptability of removal.</p> <p>Furthermore, development should promote the role of woodlands through ecological enhancement, community development opportunities and education and recreational access.</p>

Policy	Overview
<p>Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)</p>	<p>Introduces protection measures stating that the Council will not allow development that would have a negative effect on the character, integrity or setting of listed buildings, scheduled monuments, or other archaeological sites.</p>
<p>Policy PR1 Protecting Important Resources</p>	<p>Establishes that developments resulting in negative effects on resources such as air quality, water environment, mineral deposits, prime agricultural land, peat and other carbon rich soils, open spaces and important trees and woodlands will not be approved. Public economic and social benefits must be greater than any negative effects on resources and there must be no reasonable alternative sites.</p>
<p>Policy C2 Renewable Energy</p>	<p>Indicates that renewable energy developments will be supported as long as assessment takes into account: socio-economic aspects; renewable energy targets; Greenhouse Gas (GHG) emissions; communities; landscape and visual aspects; natural heritage; carbon rich soils; the historic environment; tourism and recreation; aviation, defence, telecommunications and broadcasting interests; road traffic; hydrology; and opportunities for energy storage.</p> <p>Support for renewable energy projects does not come at the expense of other policies regarding heritage, environment and natural resources.</p>
<p>Policy C3 Carbon Sinks and Stores</p>	<p>Indicates that carbon capture and storage developments are supported. Policy C3 also indicates that natural carbon sinks and stores such as woodland and peat will be protected. In the case of peat, loss of or disturbance will only be permitted if there is calculated to be no net effect on CO2 over the lifetime of the development. Similarly, the removal of woodland will be permitted only if an equal is replanted.</p>
<p>Policy C4 Flooding</p>	<p>Indicates that development should not increase flood risk and should avoid areas of medium to high flood risk, functional floodplains and other areas of heightened risk.</p> <p>Policy C4 also indicates that a Flood Risk Assessment should be undertaken and is required for development in</p>

Policy	Overview
	<p>areas of medium to high flood risk of 0.5%. If development is permitted on medium to high risk areas then development should be designed to be flood resilient, not increase flood risk and apply Sustainable Urban Drainage principles.</p>
<p>Policy RD1 Providing Suitable Services</p>	<p>Indicates that development should be designed and located to incorporate services, facilities and infrastructure, which includes considerations such as sustainable transport, alternatively fuelled vehicle facilities, water management provision, water supply and wastewater connections and treatment.</p> <p>Any new access roads as part of the proposed development must be confirmed with Aberdeenshire Council or Transport Scotland and a Transport Assessment may be required.</p>
<p>Appendix 13: Special Landscape Areas</p>	<p>Appendix to support Policy E2 'Landscape'. Appendix provides guidance on SLAs for the decision making process with regards to development management. Aims to help those involved in land management to ensure proposals do not adversely impact locally valued landscapes.</p>

4.5.4 Supplementary Guidance

Securing Positive Effects for Biodiversity in New Development: Planning advice PA20203-10

- 4.5.4.1 The Securing Positive Effects for Biodiversity in New Development: Planning advice PA20203-10 (Aberdeenshire Council, 2023c²⁹) was adopted in September 2023 and outlines the requirements for biodiversity enhancement as stipulated in Policy P1 Layout, Siting and Design of the Aberdeenshire Local Development Plan.
- 4.5.4.2 Aberdeenshire Council recommends using the English Nature Biodiversity Metric to value habitats, which requires information on habitat type, size, distinctiveness, condition, ecological connectivity and strategic significance. This data should be used to assess the impact of the data and design appropriate mitigation strategies and deliver biodiversity enhancement.

- 4.5.4.3 The delivery of biodiversity enhancement, dependent on the size of the proposed development, should be outlined within a Biodiversity Enhancement Plan, a Habitat Management Plan, a Species Protection Plan, a Species Action Plan or a Green Infrastructure Plan. It prioritises the long-term management of habitats and requires a 20 year Habitat Management Plan which includes details on actions taken for each habitat, responsible stakeholders, monitoring programmes and responsibilities and funding resources.

Baseline Ecological Survey: Planning Advice PA2023-17

- 4.5.4.4 The Baseline Ecological Survey: Planning Advice PA2023-17 (Aberdeenshire Council, 2023d³⁰) was adopted in September 2023 to support the Aberdeenshire Local Development Plan and accord with Policy 3 Biodiversity of NPF4.
- 4.5.4.5 A baseline ecological survey is required under Policy E1 Natural Heritage of the Aberdeenshire Local Development Plan and should assess any impacts of the development as well as any cumulative impacts. A baseline ecological survey is necessary to establish the data necessary to measure any positive effects and biodiversity enhancement as required by Securing Positive Effects for Biodiversity: Planning advice PA2023-10.
- 4.5.4.6 It outlines best practice and acceptable methodologies for ecological surveys to ensure that development conserves, restores and enhances biodiversity, leaving it in a better state than prior to development. It further outlines recommended timings, extent, scope and content of required surveys as well as resources and data sources on protected and notable species.

4.6 Other Material Considerations

- 4.6.1.1 Section 25 of the 1997 Act, stipulates that in "making any determination under the planning Acts, regard is to be had to the Development Plan, the determination is, unless material considerations indicate otherwise, to be made in accordance with that plan".
- 4.6.1.2 The section above outlines the key policy considerations, and section 5 details how the Proposed Development (Onshore) is in compliance with the provisions of the Development Plan.
- 4.6.1.3 Notwithstanding this, this section outlines other material considerations and assesses the development against these.

4.7 Energy Policy and the Climate Crisis

4.7.1.1 The key legislation, policies, and other material considerations applicable to the Proposed Development (Onshore) are discussed in Volume 1, Chapter 2: Legislation and Policy of the EIAR. An overview of these key policies and legislation is provided in Table 4-3 below; this is not an exhaustive list.

Table 4-3: Energy and Climate Policy and Legislative Context

Policy/Legislation	Objectives/Targets
The United Nations Framework Convention on Climate Change (United Nations, 1992 ³¹)	International treaty for addressing climate change. Sets out the framework for the creation of future agreements that would create obligations on the reduction of GHG emissions.
The Kyoto Protocol (United Nations, 2002 ³²)	Sets clear GHG emissions reduction targets for state parties. The UK and Scotland transposed these commitments via the Climate Change Act 2008 (UK Parliament, 2008 ³³) and the Climate Change (Scotland) Act 2009 (Scottish Parliament, 2009 ³⁴) respectively. Superseded by the Paris Agreement (see below)
The Paris Agreement (United Nations, 2016 ³⁵)	Legally binding international treaty on climate change. Key actions are to reduce the human impact on climate change, limiting global warming to just under 2°C but a maximum increase of 1.5°C
Electricity Generation Policy Statement - 2013 (Scottish Government, 2013 ³⁶)	Aims to deliver equivalent of 100% gross electricity consumption from renewables by 2020.
UK Renewable Energy Roadmap Update 2013 (UK Government, 2013 ³⁷)	Initially established a target of 15% of all UK electricity generated by renewables by 2020.
Clean Growth Strategy (UK Government, 2017 ³⁸)	Continued to commit the UK to strengthening its status as a leading market for offshore wind development.
Scottish Energy Strategy (Scottish Government, 2017 ³⁹)	By 2030 the equivalent of 50% energy for heat, transport and electricity to be supplied from renewable sources and an increase by 30% in the productivity of energy use across the Scottish economy.

Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Scottish Parliament, 2019 ⁴⁰)	An amendment to the Climate Change (Scotland) Act 2009 introducing a 2045 target for achieving net zero.
Offshore Wind Energy Policy (Scottish Government, 2020 ⁴¹)	Scottish Government’s ambition to capitalise on the potential that offshore wind development can bring to Scotland and the role this technology could play in meeting Scotland’s commitment to reach net zero by 2045
UK Government Build Back Better: Our Plan for Growth (UK Treasury, 2021 ⁴²)	The UK will aim to generate 40GW from offshore wind by 2030 and support up to 60,000 jobs.
The British Energy Security Strategy (UK Government, 2022 ⁴³)	Sets out the UK Government’s ambition to deliver up to 50GW of offshore wind energy development by 2030, including up to 5GW of innovative floating wind.
Blue Economy Vision for Scotland (Scottish Government, 2022 ⁴⁴)	Offshore wind is one of the many components that form Scotland’s Blue Economy. The Scottish Government has created a vision for Scotland’s Blue Economy.
Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023 ⁴⁵)	As a cheap form of electricity, offshore wind will help to decarbonise energy demand and facilitate just transition to net zero.
The Energy White Paper – Powering our Net Zero Future (UK Government, 2020 ⁴⁶)	Outlines the main route to achieving the target of 40GW of offshore wind capacity by 2030, including 1GW of floating offshore wind capacity.
Overarching National Policy Statement for Energy (EN-1) (UK Government, 2024 ⁴⁷)	Identifies the need for energy infrastructure to meet the UK’s energy demand and places a greater sense of urgency on new energy developments. Provides significant support for a faster deployment of offshore wind and supporting grid infrastructure.
National Policy Statement for Renewable Energy Infrastructure (EN-3) (UK Government, 2024 ⁴⁸)	Sets a positive policy environment for renewable energy developments and designated offshore wind developers as critical national priority projects.

- 4.7.1.2 The above policy and regulatory aims can be summarised as four key drivers for the shift in energy production to low carbon sources in the UK and Scotland, including renewable energy, which are:
- The urgent need to tackle climate change;
 - The need to secure an affordable energy supply;
 - The need for new energy infrastructure; and
 - The need to maximise economic opportunities of the transition to a low carbon economy.
- 4.7.1.3 Delivering on the UK and Scotland’s offshore wind energy production potential is an absolutely integral part of achieving the legally binding net zero targets.
- 4.7.1.4 The Proposed Development, as a source of clean energy, will make an important contribution in helping to achieve the relevant International, European, UK and Scottish climate change policy aims and legislative requirements. It is evident that wind energy has a very significant role to play in the effort to reduce global carbon emissions. The Proposed Development will contribute to the four drivers above by delivering around 2GW of low carbon power generation capacity.

5 Planning Assessment

5.1.1.1 In this section of the Statement, the Proposed Development (Onshore) is assessed against the key policies and material considerations for the determination of the planning application.

5.2 Principle of Development

5.2.1.1 The Proposed Development (Onshore) which seeks to provide the development of the following infrastructure; Landfall Site, ONEC, Onshore Substations, and an Onshore Grid Connection, to facilitate the export of circa 2GW of power generated from the Caledonia OWF; qualifies as a National Development as set out by Part 3, Section 3: 'Strategic Renewable Electricity Generation and Transmission Infrastructure of NPF4. Specifically, that a development within one or more of the Classes of Development described below is designated a national development:

- a) On and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity; and
- b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132 kV or more; and) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.

5.2.1.2 For National Developments, the NPF4 provides that the 'need' has already been established and that consenting considerations should deal with design and mitigation.

5.2.1.3 The application for PPP therefore requires to be determined on the basis of its design and mitigation and the residual effects it is likely to give rise to, with recognition that both the application for PPP and the OWF it facilitates are defined as developments of national significance.

5.2.1.4 At a local level, Policy C2 of the Aberdeenshire LDP 2023 also provides support for the provision of renewable energy infrastructure so long as they are appropriately sited and adopt a suitable design.

5.2.1.5 Further considerations include but are not limited to renewable energy targets, landscape and visual aspects, natural heritage, traffic and transport, noise and historic environment.

5.2.1.6 In principle, the LDP provides high level support for development of this nature, subject to detailed assessment and consideration of the likely environmental impacts, and avoidance of unacceptable significant impacts.

5.3 Land Use

5.3.1.1 The policies identified to be of relevance to land use and agriculture (Volume 5, Chapter 2: Land Use) are as follows:

NPF4

- Policy 5: Soils; and
- Policy 6: Forestry, woodland and trees.

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- Policy PR1: Protecting Important Resources; and
- Policy E3: Forestry and Woodland.

5.3.1.2 Policy 5 (b) (iv) permits development proposals on prime agricultural land where the development proposal is for renewable energy sources, and it can be demonstrated that the layout and design of the development proposal has minimised the impact on protected land. Policy PR1 aims to conserve and protect natural resources and development proposals which have an adverse impact on prime agricultural land, peat and other carbon rich soils, and important trees and woodlands. Policy PR1 further outlines that agricultural land classes 1, 2, and 3.1 should not be developed unless it's essential.

5.3.1.3 Policy 6 aims to protect and expand forests, woodlands and trees. Policy 6 (b) sets out instances where development proposals will not be supported which includes loss of ancient woodlands, adverse impacts on native woodlands, hedgerows or trees of high biodiversity value and the fragmenting or severing of woodland habitats. Policy E3 aims to protect and safeguard forestry and woodland in Aberdeenshire with a presumption against the removal of safe and healthy trees, woodlands and hedgerows.

5.3.1.4 EIAR Volume 5, Chapter 2: Land Use assesses the potential impacts of agricultural land, soils and forestry and any resulting environmental effects of the Proposed Development (Onshore). The Proposed Development (Onshore) has avoided high value agricultural and forestry land as far as practicable for the ONEC. Notable forested areas in the study area will also be avoided and impacts minimised by using trenchless crossing methodologies, siting of infrastructure at detailed design and by establishing root and canopy protection zones. The forementioned embedded mitigation measures demonstrates compliance with Policy PR1, Policy 6 and Policy E3.

5.3.1.5 It is anticipated that approximately 235ha of Class 3.1 agricultural land will be impacted on a temporary basis. Agricultural land will be reinstated following construction to existing agricultural use and field drains will be protected as far as practicable with any impacts remedied as part of the reinstatement process. There will be localised areas which house buried Cable Joint Bays (where one section of cable is jointed to the next) which

will not be fully restored, though the impact of these are anticipated to be minor and not significant in the wider context of agricultural land. The EIAR also identifies no significant effects in relation to carbon-rich soil or peat. The Proposed Development (Onshore) is therefore considered to be compliant with policy PR1 and Policy 5 (b) (iv) as there will be no long term impacts or permanent loss of agricultural land and soils.

- 5.3.1.6 The implementation of mitigation measures identified within Volume 5, Chapter 2: Land Use is considered to avoid significant residual effects. Therefore, it is considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policies PR1 and NPF4 Policies 5 and 6.

5.4 Landscape and Visual Impact

- 5.4.1.1 The policies identified to be of relevance to landscape and visual impacts (Volume 5, Chapter 4: Landscape and Visual) are as follows:

NPF4

- Policy 11: Energy.

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- Policy E2: Landscape;
- Policy C2: Renewable Energy;
- Policy R1: Special Rural Areas; and
- Appendix 13: Special Landscape Areas.

- 5.4.1.2 Policy 11 (e) (ii) of NPF4, states that significant landscape and visual impacts are to be expected from some forms of renewable energy generation however where impacts are localised and/or appropriate design mitigation has been applied they will generally be considered acceptable.
- 5.4.1.3 Policy E2 restricts development that causes unacceptable effects on key characteristics, natural landscape elements, features of the composition or quality of the landscape character as defined NatureScot's Landscape Character Assessments. This policy restricts development that has a significant adverse impact on the qualifying interests of a SPA unless these effects are clearly outweighed by social, environmental or economic benefits of at least local importance. Appendix 13: Special Landscape Areas, supports Policy E2 and provides guidance to the management and use of land within SPAs. The Proposed Development (Onshore) is located within Special Landscape Area 1: North Aberdeenshire Coast. Appendix 13 recommends that development that would impact the coastal cliffs and headlands should be carefully considered.
- 5.4.1.4 Policy E2 states that a Landscape and Visual Impact Assessment (LVIA) may be required to assess the effects of the change on landscape.

- 5.4.1.5 Policy C2 supports renewable energy developments that are appropriately sited and designed and can demonstrate how the potential effects, such as landscape and visual effects, have been accounted for.
- 5.4.1.6 In accordance with Policy 11 of the NPF4, Policies E2 and C2 a LVIA has been submitted in support of this application (EIAR Volume 5, Chapter 4: Landscape and Visual). The LVIA demonstrates the likely landscape and visual effects of the Proposed Development (Onshore) on landscape character and resources and visual amenity. The Proposed Development (Onshore) has taken a design-led approach to ensure the components are in keeping with the existing land uses, appropriately sited and where required, mitigation is proposed. The Proposed Development (Onshore) ensures adequate protection of the landscape character of the area. SLAs and other landscape designations were considered when undertaking the site selection process and the Onshore Substation Site has been located as low as possible within the existing landscape. The Proposed Development (Onshore) will utilise HDD methods to avoid impact on the coastal cliffs within the SLA. Screening and planting of local character including native woodlands is also proposed to reinforce screening and restore landscape character. Additional mitigation is outlined below in paragraph 5.4.1.8.
- 5.4.1.7 Policy R1 safeguards the special nature of the green belt and coastal zone and restricts development opportunities. The Proposed Development (Onshore) Landfall site is located within a coastal zone. Development in a coastal zone must require a coastal location or demonstrate there are clear social, economic, environmental or community benefits arising. The Proposed Development (Onshore) will provide essential infrastructure to enable electricity transmission from the Caledonia OWF. Whilst the Proposed Development (Onshore) is located in a coastal zone, as demonstrated in Section 1.2.3, there is a clear need for the Proposed Development (Onshore) to contribute to net zero targets, provide energy security and ensure the affordability of energy supply, which complies with Policy R1.
- 5.4.1.8 Proposed embedded mitigations include the advanced mitigation planting (prior to construction) to mixed native hedgerow along the northern boundary of the OnTI RLB and parts of the eastern boundary as well as blocks of mixed native woodland to the east of Swanford. Mitigation planting after completion of Phase 1 and Phase 2 at the Onshore Substations, will also comprise areas of mixed native woodland/shrub mix woodland and deciduous native woodland/shrub mix along the Onshore Substation boundaries. Further mitigation planting will take place within the OnTI RLB comprising the reinstatement of removed hedgerows and the replanting of removed trees and areas of woodland, where possible within the OnTI RLB.

- 5.4.1.9 Depending on the final design and size of the Onshore Substations, soil strip and earthworks to create the Onshore Substations platform may result in surplus soil and excavation material. If available, this could potentially be used in the creation of landscape bunding. This will further limit views of the Onshore Substations and provide further landscape and visual mitigation. Due to the unknown quantity and suitability of such soils for mounding this is not considered within proposed mitigation measures at this stage.
- 5.4.1.10 The implementation of embedded and secondary mitigation measures is considered to be sufficient to reduce the effect of the Proposed Development (Onshore) to not significant levels following 15 years of operation and therefore it is considered that the Proposed Development (Onshore) complies with NPF4 policy 11 and Aberdeenshire LDP policies E2, R1 and Appendix 13.

5.5 Ecology

- 5.5.1.1 The policies identified to be of relevance to ecology (Volume 5, Chapter 3: Terrestrial Ecology and Biodiversity) are as follows:

NPF4

- Policy 3: Biodiversity;
- Policy 4: Natural Places; and
- Policy 6: Forestry, Woodland and Trees.

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- Policy E1 Natural Heritage; and
- Policy E3 Forestry & Woodland.

- 5.5.1.2 Policy 3 of the NPF4 aims to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Policy 3(b) outlines that development proposals for national or major development, or development that requires an EIA will only be supported where it is demonstrated the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention, including future management.
- 5.5.1.3 Policy 4 of the NPF4 aims to protect, restore and enhance natural assets making best use of nature-based solutions. It outlines that (a) "development proposals which by virtue of type, location, or scale will have an unacceptable impact on the natural environment, will not be supported."

- 5.5.1.4 A Biodiversity Enhancement Report has been developed and submitted in support of this application (EIAR Volume 7E, Appendix 3-1: Biodiversity Enhancement Report) to inform the potential proposed enhancements for the Proposed Development (Onshore) and to satisfy Policy 3 and Policy 4 of the NPF4. The Biodiversity Enhancement Report provides details of the potential impacts on the habitats identified within the OnTI RLB to determine the potentially required habitat mitigation and enhancement to achieve a Biodiversity Net Gain (BNG) as a result of the Proposed Development (Onshore). The delivery of off-site habitat creation or enhancement will be discussed in detail with Aberdeenshire Council at detailed design in order to secure the most appropriate delivery mechanism.
- 5.5.1.5 Policy E1 restricts development where it may have an unacceptable adverse effect on a nature conservation site designated for its biodiversity, species, habitat, or geodiversity importance. This policy states that new development on Nature Conservation sites will not be supported unless the impacts can be clearly outweighed by other social, environmental and economic benefits and any impacts are appropriately mitigated in line with the relevant legislation and guidance. Section 2.5 details the designated sites in and surrounding the Proposed Development (Onshore). There is one designated site located within the OnTI RLB, the Cullen to Stake Ness Coast SSSI. Embedded mitigation measures in this area include using HDD for the Landfall Site to avoid direct impacts on the coastal cliffs and habitats within the SSSI, no works will occur within the SSSI and the construction compound will be set back from the SSSI with suitable buffers and a CEMP implemented. With the implementation of embedded mitigation measures, there will be no significant impact from the Proposed Development (Onshore) on the Cullen to Stake Ness Coast SSSI, and therefore the Proposed Development (Onshore) complies with Policy E1.
- 5.5.1.6 Policy E1 also indicates that a baseline ecological survey must be carried out where there is evidence of habitats, geological features or species of importance. Furthermore, the development must be designed to avoid impacts where possible, enhance ecological net gain and impacts cannot be avoided be clearly outweighed by public benefits. In accordance with Policy E1, detailed survey work has been undertaken. This includes Badger Surveys, Breeding Bird Surveys, Fish and Fresh Water Pearl Mussel Surveys, Otter and Water Vole Surveys, and Wintering Bird Surveys. Due to survey timings, Bat Survey information will be submitted as supplementary information to the PPP application.

- 5.5.1.7 A range of embedded mitigation has been proposed to mitigate or off-set negative ecological effects and deliver ecological enhancements. Embedded mitigation measures include; preparation of a CEMP (an outline CEMP is submitted in support of this application), preparation of a CTMP (an outline CTMP is submitted in support of this application), avoidance of notable habitats through micro-siting and use of HDD technology. This embedded mitigation in most cases will avoid permanent or temporary habitat loss, fragmentation or degradation to ecological receptors.
- 5.5.1.8 Additionally, a range of secondary mitigation measures includes, but is not limited to the appointment of an Ecological Clerk of Works (ECoW), a detailed Lighting Management Plan and the timing of works to avoid sensitive times of the day or sensitive months, such as the breeding bird season (March to August inclusive).
- 5.5.1.9 Policy E3: Forestry and Woodland aims to protect and, where appropriate, enhance Aberdeenshire's forests and native and semi-natural woodland to ensure the environment, habitats, species and local culture are safeguarded, whilst also benefiting and supporting the local and national economy. The policy states a presumption against the removal of safe and healthy trees, non-commercial woodlands and hedgerows. Through realignment of the OnTI RLB during the optioneering stages, large, forested areas of plantation woodland were avoided. There are small areas of fragmented woodlands located within the OnTI RLB however through detailed optioneering of the cable route post consent and the use of embedded mitigations such as HDD, it is anticipated that there will be no significant adverse impact on woodlands. Trees and hedgerows within the OnTI RLB will be removed to facilitate the construction of the Proposed Development (Onshore) however, replacement planting within the OnTI RLB, where possible, will be implemented during or at the end of the construction period.
- 5.5.1.10 EIAR Chapter 3 Terrestrial Ecology and Biodiversity identifies that, following the implementation of embedded and secondary measures, no significant residual effects to ecological features are identified and therefore it is considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policies E1 and E2, and NPF4 policy 3, 4 and 6.

5.6 Biodiversity Net Gain

5.6.1.1 The policies identified to be of relevance to BNG (Volume 5, Chapter 3: Terrestrial Ecology and Biodiversity) are as follows:

NPF4

- Policy 1: Tackling the climate and nature crises; and
- Policy 3: Biodiversity.

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- Policy P1 Layout, Siting and Design; and
- Policy E1 Natural Heritage.

5.6.1.2 Securing positive effects for biodiversity is one of the six statutory outcomes for the NPF4. Improving biodiversity is a cross-cutting theme of the NPF4, and therefore should be read in conjunction with Section 5.5 Ecology.

5.6.1.3 Policy 1 of the NPF4 is relevant to all developments. It states when considering all development proposals significant weight will be given to the global climate and nature crises.

5.6.1.4 Policy 3 of the NPF4 plays a critical role in ensuring that development will secure positive effects for biodiversity. Policy 3 outlines a requirement for developments to “protect biodiversity, reserve biodiversity loss, deliver positive effects from development and strengthen nature networks”. Under Policy 3a and 3b, further detail is provided on the requirements for development proposals that require an EIA, to “contribute to the enhancement of biodiversity” and furthermore that this enhancement must be demonstrable.

5.6.1.5 A Biodiversity Enhancement Report (EIAR Volume 7E, Appendix 3-1) has been prepared to support the application and to satisfy the requirements of Policy 3 of the NPF4. So that enhancements are demonstrable and in line with additional guidance, BNG calculations were undertaken using the Statutory Biodiversity Metric published in February 2024. The Biodiversity Enhancement Report informed the proposed enhancements for the Proposed Development (Onshore) outlined in above.

5.6.1.6 Policy P1 outlines that measures are required to be identified to enhance biodiversity in proportion to the opportunities available and the scale of the development opportunity. It further states that in very rare circumstance, when it is not practical to meet biodiversity net gain within a development site, off-site contributions may be required towards biodiversity enhancements within the settlement or near to the site.

- 5.6.1.7 Policy E1 indicates the development must be designed to avoid impacts where possible, enhance ecological net gain and where impacts cannot be avoided be clearly outweighed by public benefits. It further states that development proposals will only be approved where an ecological or geological management plan is provided that includes necessary mitigation and compensation measures to result in ecological net gain.
- 5.6.1.8 Proposed potential enhancements include modified and neutral grassland habitats to the north and south of the Onshore Substations to mitigate for loss of grassland habitats and ensure habitats to benefit invertebrates, foraging and nesting birds, and foraging bats. The Biodiversity Enhancement Report identifies the potential for enhanced ecological corridors to be created through newly created hedges and habitats to complement the retention, where possible, of existing hedges with additional landscape planting. Improvements to existing hedgerow habitats are also proposed to provide additional enhancements for protected species to forage, nest and roost as hedge features develop into maturing trees. The proposed Sustainable Drainage Systems (SuDS) pond has also been identified as an area for enhancement provide foraging and future nesting opportunities for bats. Furthermore, additional proposed enhancements include the provision of in bird and bat boxes, daylighting of culverts and removal of barriers to fish passage.
- 5.6.1.9 The delivery of off-site habitat creation or enhancement will be discussed in detail with Aberdeenshire Council at detailed design in order to secure the most appropriate delivery mechanism.
- 5.6.1.10 Based on the findings of the Biodiversity Enhancement Report, the exact amount of habitat to be lost is unknown at this stage. At detailed design, it will be possible to calculate the loss of area-based habit more accurately. However, through the implementation of both on-site and off-site enhancements, it is considered that the Proposed Development (Onshore) will enhance biodiversity and therefore complies with Aberdeenshire LDP Policy E1 and NPF4 Policy 1 and 3.

5.7 Built and Cultural Heritage

- 5.7.1.1 The policies identified to be of relevance to built and cultural heritage (Volume 5, Chapter 5: Terrestrial Archaeology and Cultural Heritage) are as follows:

NPF4

- Policy 7: Historic assets and places

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- Policy HE1: The Historic Environment

- 5.7.1.2 Policy 7: Historic assets and places aims to protect and enhance historic environment assets and places. Policy 7 (a) requires that development proposals which could potentially significantly impact historic assets are accompanied with an assessment which is based on an understanding of the cultural significant of the historic asset.
- 5.7.1.3 Policy 7 (h) requires that development proposals affecting scheduled monuments should avoid direct impacts or significant adverse impacts on the integrity of the setting of the scheduled monument.
- 5.7.1.4 Policy HE1: The Historic Environment, aims to protect and improve the historic environment within Aberdeenshire. The policy states where there would be an unavoidable adverse impact on listed buildings, scheduled monuments and archaeological sites the effects should be minimised and justified.
- 5.7.1.5 A Historic Environment Desk Based Assessment (HEDBA) (EIAR Volume 7E, Appendix 5-1) was undertaken to inform the EIAR with Volume 5, Chapter 5: Terrestrial Archaeology and Cultural Heritage providing an assessment of the potential impact of the Proposed Development (Onshore) on historic assets.
- 5.7.1.6 No significant effects were identified on terrestrial archaeology however, it is proposed to mitigate effects from construction by implementing an appropriate programme of archaeological investigation and recording. The primary mitigation measures proposed are archaeological investigations and the preservation of assets in situ.
- 5.7.1.7 There are no designated heritage assets within the OnTI RLB and with proposed mitigation measures, the effect on assets during construction is minor to negligible (not significant). A potential mitigation measure is also identified in regards the development of a CTMP including mitigation measures for Millbrex Church should the lane adjacent to Millbrex Church be identified as a construction traffic route. It is anticipated with the proposed mitigation measures, the effects on terrestrial archaeology and cultural heritage could be further reduced.
- 5.7.1.8 With the implementation of the above mitigation measures, the Proposed Development (Onshore) will have no significant residual effects on terrestrial archaeology and cultural heritage and therefore complies with Aberdeenshire LDP Policy HE1 and NPF4 Policy 7.

5.8 Traffic and Transport

5.8.1.1 The policies identified to be of relevance to traffic and transport (Volume 5, Chapter 9: Traffic and Transport) are as follows:

NPF4

- Policy 11: Energy; and
- Policy 13: Sustainable Transport.

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- Policy C2: Renewable Energy; and
- Policy RD1: Providing Suitable Services.

5.8.1.2 Policy 11 (e) (vi) requires that energy developments demonstrate how they have addressed issues surrounding effects on road traffic and on adjacent trunk roads, including during construction.

5.8.1.3 Policy 13 requires that a transport assessment is undertaken in accordance with the relevant guidance where a development proposal will generate a significant increase in the number of person trips.

5.8.1.4 Policy C2 supports renewable energy developments that are appropriately sited and designed and can demonstrate how the potential effects, such as road traffic have been accounted for.

5.8.1.5 Policy RD1 indicates that development should be designed and located to incorporate services, facilities and infrastructure which includes considerations such as sustainable transport. The policy requires that any new access roads as part of new developments must be confirmed with Aberdeenshire Council or Transport Scotland and a transport assessment may be required.

5.8.1.6 Chapter 9: Traffic and Transport of the EIAR provides an assessment of the potential impact of the Proposed Development (Onshore) on traffic and transport.

5.8.1.7 Within the chapter it was identified that the most LSEs on the local road network will result from vehicle movements during the construction phase.

5.8.1.8 Potential significant effects, prior to the implementation of mitigation, were identified for receptors on the B9139, west of Banff and an east-west running unclassified road located approximately 3.5km to the west of Birkenhills. These effects are temporary in nature and will be mitigated through the proposed embedded mitigation measures detailed in the section below, therefore no secondary mitigation is considered to be required.

5.8.1.9 An Outline CTMP has been submitted alongside this application and a more detailed CTMP will be developed at detailed design stage and submitted as part of an AMSC application. Similarly, an Outline CEMP (Volume 7, Appendix 10) has been submitted in support of this application. A final

CEMP will accompany the CTMP and will act as a supporting mitigation measure. The CTMP and CEMP outline how any potential effects on the road network have been accounted for during construction and operation.

5.8.1.10 The Applicant has also been in regular communications with Aberdeenshire Council as transport authority in regards the development of the Proposed Development (Onshore) assessment.

5.8.1.11 With the above mitigation measures and plans in place, no significant residual effects upon traffic and transport as a result of the Proposed Development (Onshore) are predicted and therefore it is considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policy C2, Policy RD1 and NPF4 polices 11 and 13.

5.9 Hydrology and Flood Risk

5.9.1.1 The policies identified to be of relevance to Hydrology and Flood Risk (Volume 5, Chapter 6: Hydrology and Hydrogeology) are as follows:

NPF4

- Policy 11: Energy; and
- Policy 22: Flood risk and water management.

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- Policy PR1: Protecting Important Resources;
- Policy C4: Flooding; and
- Policy RD1: Providing suitable services.

5.9.1.2 Policy 11 of NPF4 supports in principle all forms of renewable energy developments. Policy 11 (e) (viii.) requires that development proposals demonstrate how the effects on hydrology, the water environment and flood risk have been considered. EIAR Volume 5, Chapter 6: Hydrology and Hydrogeology assesses the potential impact of the Proposed Development (Onshore) on hydrology and hydrogeology. A series of embedded mitigation measures have been taken into account including a CEMP (which will include pollution prevention mitigation and surface water management plans), a suitable floodplain compensation strategy for works impacting the floodplain, the avoidance of placement of construction compounds in flood zones and the use of HDD as a preferred crossing technique for all Water Framework Directive classified watercourses. Additionally, EIAR Volume 6, Chapter 3: Climate Change Resilience Assessment identifies that heavy rainfall and related surface water flood have the potential to impact construction and operation and have been considered during the Proposed Development (Onshore) design. The consideration of embedded mitigation to prevent adverse impacts from flooding demonstrates compliance with Policy 11 (viii).

- 5.9.1.3 Policy 22 of NPF4 aims to strengthen resilience to food risk and protect existing and future developments from the impacts of flooding. Policy 22 (c) states that development proposals should not increase the risk of surface water flooding, should manage rain and surface water through SUDs and seek to minimise the area of impermeable surface. A surface water and groundwater management plan will be implemented which will include embedded mitigation measures such as; including suitable sized temporary settlement and drainage basins and culverts during construction to reduce the potential impact of surface water flooding. The Onshore Substation Site will have appropriate drainage and SUDs in place to safeguard the surrounding water environment. There will be an increase in impermeable surface caused by the Onshore Substations however an appropriate drainage design including SUDs will mitigate the impact of surface water runoff and the risk of pluvial flooding. The above embedded mitigation measures demonstrate the Proposed Development (Onshore) would be in compliance with Policy 22.
- 5.9.1.4 Policy PR1 aims to protect important resources and does not support developments which will have a negative impact on environmental resources associated with the water environment. Embedded mitigation includes the implementation of a CEMP which will outline a surface water management plan which will be agreed with SEPA and be implemented pre-construction. The surface water management plan will include temporary cutoff drains or bunds to placed upslope side of the working area to minimise water runoff interacting with exposed soil. The implementation of embedded mitigation to prevent an adverse impact on the water environment demonstrates the Proposed Development (Onshore) is in compliance with Policy PR1.
- 5.9.1.5 Policy C4 supports renewable energy developments that do not increase flood risk vulnerability and avoid areas of medium to high risk, functional flood plain or other areas where the risks are assessed as heightened or unacceptable. As described above, Chapter 6: Hydrology and Hydrogeology of the EIAR qualitatively assessed the magnitude of potential impacts on the surrounding water environment and provides details of the proposed mitigation measures. It is considered that with the implementation of embedded and secondary mitigation which includes suitable drainage strategies, discharge rates, and appropriate flood risk mitigation there would be no change to the significance of flood risk effects in the area, demonstrating the Proposed Development (Onshore) would be in compliance with policy C4.
- 5.9.1.6 Policy RD1 supports renewable energy developments that are designed and located to incorporate services, facilities and infrastructure necessary to support it. During construction, drainage infrastructure will be provided to support the new development. During operation the implementation of a surface water drainage system, placing infrastructure outside of high and

medium risk flood zones, and a monitoring and maintenance programme will be implemented to support the development. The Proposed Development (Onshore) and supporting infrastructure, facilities, and services would therefore be in compliance with policy RD1.

- 5.9.1.7 With the above mitigation measures and plans in place, there will be no significant residual effects on the water environment, after embedded mitigation has been taken into account and therefore the development complies with Aberdeenshire LDP Policy PR1, C4, RD1, and NPF4 policy 22.

5.10 Geology Soils and Contaminated Land

- 5.10.1.1 The policies identified to be of relevance to Geology Soils and Contaminated Land (Volume 5, Chapter 7: Geology Soils and Contaminated Land) are as follows:

NPF4

- Policy 4: Natural places;
- Policy 5 Soils; and
- Policy 9: Brownfield.

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- Policy R3.9: Minerals;
- Policy PR 1.1: Protecting Important Resources;
- Policy PR1.9: Minerals;
- Policy PR1.10: Peat and carbon rich soils;
- Policy C3.1: Carbon Sinks and Stores;
- Policy E1.7: Wider Biodiversity and Geodiversity; and
- Policy P4: Hazardous and Potentially Polluting Developments and Contaminated Land.

- 5.10.1.2 Policy 5 of NPF4 aims to protect carbon-rich soils and minimise disturbance to soils from development. Policy 5 (c) (i) states that development proposal on peatland, carbon-rich soils and priority peatland habitat will only be supported for essential infrastructure where there is a specific locational need and Policy 5 (ii) states that development will be supported for the generation of energy from renewable sources that contributes to GHG reduction targets. In principle, the Proposed Development (Onshore) which supports renewable energy generation is therefore compliant with Policy 5.

- 5.10.1.3 Policy 5 (d) additionally states that where development is proposed on peatland, carbon rich soils or priority peatland, a detailed site-specific assessment will be required. The assessment should include baseline depth, habitat condition, the likely effects of the development on peatland and the likely net effects of the development on climate emissions and loss of carbon.
- 5.10.1.4 Policy PR1 aims to protect important resources and does not support development which have a negative impact on important environmental resources such as important mineral despoths and peat and other carbon rich soils.
- 5.10.1.5 There are no mapped peat deposits within the Onshore Substation Site. Where peat or carbon-rich soils cannot be avoided within the OnTI RLB, the Onshore Export Cable Route will be designed such that the effect on peat hydrology and carbon losses are minimised through a Peat Management Plan. EIAR Volume 5, Chapter 7: Geology, Soils and Contaminated Land assesses the potential impact on peat and carbon rich soils and concludes that there would be no significant adverse impact with embedded mitigation. An Outline Peat Management Plan is provided in support of the application (Application Document 7) which demonstrates how any impacts on peat would be managed throughout the development. It is therefore considered that the Proposed Development (Onshore) complies with Policy 5 of NPF4 and Policy PR1 of Aberdeenshire LDP.
- 5.10.1.6 Policy 9 (c) of NPF4 requires that where land is known or suspected to be unsuitable or contaminated, development proposals must demonstrate that the land is safe and suitable for the proposed use. EIAR Volume 5, Chapter 7: Geology, Soils and Contaminated Land states that the presence and nature of contaminated land and the potential risks to human health, surface water and groundwater will be identified, assessed and managed in accordance with Scottish Government Regulations and statutory guidance to ensure that the land does not meet the statutory definition for contaminated land. This will be managed through the CEMP which includes Land Contamination: Risk Management. Geoenvironmental Quantitative Risk Assessments to be undertaken to inform remedial and mitigation measures. With the proposed embedded mitigation measures, the approach to contaminated land is considered to comply with Policy 9 of NPF4.
- 5.10.1.7 Policies R3.9, PR1.1, PR1.9 supports renewable energy developments that are intended to identify and safeguard important mineral resources. There are no Mineral Safeguarding Areas (MSA) within the study area in EIAR Volume 5, Chapter 7: Geology, Soils and Contaminated Land (the OnTI RLB plus a buffer zone of 100m).
- 5.10.1.8 The BGS database notes that there are eight 'Ceased' quarries and the Potentially Contaminated Sites (PCS) database identifies ten pits or quarries within the study area. The majority of these former pits and

quarries are not considered to be significant with regards to potential mineral sources. Two mineral areas of search are present within the study area, at Idoch, Cuminestown and Banff West. These areas of search have been defined at county (Aberdeenshire) level for sand and gravel supply. The construction of the ONEC will cause temporary sterilisation of the mineral resource, however this is expected to be less than 20% and therefore the magnitude of impact is considered low as the majority of the area of search is still available for exploitation during construction. The residual effect of this is minor and not considered significant in EIA terms, therefore complying with Policy R3 and PR1 of Aberdeenshire LDP.

5.10.1.9

Policy E1 aims to protect the natural environment and natural heritage. Policy E1.7 requires that a baseline geological survey is prepared to support development proposals where there is evidence a geological feature may exist on or adjacent to the site. A baseline survey is included within Volume 5, Chapter 7: Geology Soils and Contaminated Land. There are two designated geological sites within the study area of national importance and of high sensitivity (Cullen to Stake Ness Coast SSSI and Cullen to Troup Head Banffshire Coast Geological Conservation Review site). HDD will be used at the Landfall Site to minimise the disturbance of the geological exposures on the cliffs, which the two designations refer to. The overall effect on geological designations is minor and not significant, therefore the Proposed Development (Onshore) is considered to be in compliance with policy E1.7.

5.10.1.10

Policy P4.1 states that development proposals will not be supported if there is risk that it could result in significant pollution or present an unacceptable danger to the public or environment. During construction there are a small number of contaminated land sources which could be disturbed. Pollution prevention measures outlined in the CEMP will mitigate the effects of contamination on soil and water quality during the event of a fuel spillage and/or construction material. During operation, in the event a leak or spill a pollution incident response plan will be in place to manage and avoid significant impacts. The magnitude of impact from such incidents is anticipated to be negligible, the overall effect is considered to be minor and not significant in EIA terms, therefore the Proposed Development (Onshore) is considered to be compliant with policy P4.1.

5.10.1.11

With the above mitigation measures and plans in place, there will be no significant residual effects for geology, soils and contaminated land. The Proposed Development (Onshore) therefore complies with Aberdeenshire LDP Policy R3.9, PR1.1, PR1.9, PR1.10, C3.1, E1.7, E1.8, and P4, and NPF4 policies 4, 5, and 9.

5.11 Noise

5.11.1.1 The policies identified to be of relevance to Noise (Volume 5, Chapter 8: Airborne Noise and Vibration) are as follows:

NPF4

- Policy 11: Energy; and
- Policy 23: Health and Safety.

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- Policy C2: Renewable Energy

5.11.1.2 Policy 11 e) (i) of NPF4 requires that project design and mitigation will demonstrate how the impacts on communities and individual dwellings including noise will be mitigated.

5.11.1.3 Policy 23 of NPF4 aims to protect people and places from environmental harm and mitigate risks arising from safety hazards. Policy 23 (e) addresses noise impacts and indicates that the agent of change principle is to be applied to noise sensitive development and where necessary, a Noise Impact Assessment should be undertaken if effects are likely necessary.

5.11.1.4 Policy C2 of Aberdeenshire LDP supports renewable energy developments where they are appropriately sited and designed and can demonstrate how effects on communities have been considered.

5.11.1.5 The noise assessment within the EIAR (Volume 5, Chapter 8: Airborne Noise and Vibration) identifies the potential effects on airborne noise and vibration (groundborne) associated with the construction, operation and decommissioning of the Proposed Development (Onshore) and considers the impact of noise and vibration on Noise Sensitive Receptors (NSR). NSRs considered comprise the closest residential properties to construction activities and the Onshore Substation Site.

5.11.1.6 The assessment provided in EIAR Volume 5, Chapter 8: Airbourne Noise and Vibration identified potentially significant noise effects at a range of separation distances from the proposed construction activities at the Landfall Site and ONEC. Noise impacts from construction of the Onshore Substation Site and from associated road traffic are identified as not significant. Noise impacts during the operation of the Onshore Substation Site are identified as not significant at the closest NSR, following specification of appropriate mitigation and commitment to meeting appropriate noise limits.

5.11.1.7 The noise assessment considers the following embedded mitigation:

- Attenuation of electrical plant within the Onshore Substation Site;
- Implementation of a CTMP; and
- Implementation of a CEMP.

5.11.1.8 Through implementation of mitigation measures no significant effects as a result of noise and vibration are identified.

5.11.1.9 The noise assessment demonstrates there will be no significant residual noise and vibration effects, after mitigations measures have been taken into account and therefore it is considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policy C2 and NPF4 Policies 11 and 23.

5.12 Socioeconomic, Tourism & Recreation

5.12.1.1 The policies identified to be of relevance to Socioeconomics, Tourism and Recreation (Volume 6, Chapter 2: Socioeconomic, Tourism and Recreation) are detailed below. It should be noted that the assessment of socioeconomics, tourism and recreation considers both the onshore and offshore activities of the Proposed Development. However, all of the receptors considered relate to the Proposed Development (Onshore) only.

NPF4

- Policy 11: Energy; and
- Policy 25: Community Wealth Building.

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- Policy C2: Renewable Energy.

5.12.1.2 Policy 11 requires that development proposals maximise net economic impact for local communities and should contribute to socio-economic benefits relating to employment, associated business or supply chain development. Furthermore, Policy 11 states that cumulative impacts should be addressed.

5.12.1.3 Policy 25 aims to encourage, promote and facilitate a new strategic approach to economic development and aims to ensure development proposals contribute tangible economic benefits to communities and places.

5.12.1.4 Receptors that are most sensitive to effects of the Proposed Development (Onshore) include the supply chains and economies of Aberdeenshire, the North of Scotland, Scotland and the UK, with Aberdeenshire and the North of Scotland most sensitive to the Proposed Development.

5.12.1.5 Economic impacts are expected to be positive, with the Proposed Development potentially supporting up to 3,720 jobs during construction and 450 jobs during the operational phase, contributing to the just transition to net zero. A Supply Chain Development Statement has been produced by the Applicant and indicates an associated Proposed Development construction expenditure of £1,406m for Scotland and £1,705m for the rest of the UK.

- 5.12.1.6 Other receptors assessed include tourism assets, which would experience secondary impacts from the Proposed Development (Onshore). Specific impacts to tourism assets are assessed as low. The landscape and visual assessment identifies potential significant effects on landscape character within 3km of the Onshore Substation Site, within which North East Shooting Breaks is located. As landscape setting is not a fundamental driver of the decision to participate in the activities at North East Shooting Breaks, therefore no significant effects are identified for this receptor.
- 5.12.1.7 In relation to community wealth building, The UK Government's Department of Energy Security and Net Zero is developing recommendations for funding for communities in proximity to electricity transmission network infrastructure. The Applicant will comply with these recommendations once these are finalised and will consult on our proposals when these recommendations have been issued.
- 5.12.1.8 Policy C2 supports renewable energy developments that are appropriately sited and designed and can demonstrate how effects on socio-economic aspects as well as tourism and recreation are taken into account. EIAR Volume 6, Chapter 2: Socioeconomics, Tourism and Recreation has been submitted to accompany this submission which demonstrates the consideration of the impacts on socio-economic aspects, tourism and recreation.
- 5.12.1.9 With the above EIAR chapter and associated documentation, there will be no significant residual effects on socio-economics, tourism and recreation, after embedded mitigations have been taken into account and therefore it is considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policy C2 and NPF4 Policy 11 and 25.

5.13 Climate Change Resilience and Greenhouse Gases

- 5.13.1.1 It should be noted that the assessment of climate change resilience and GHG within the EIAR considers both the onshore and offshore activities of the Proposed Development.
- 5.13.1.2 The policies identified to be of relevance to Climate Change Resilience and Greenhouse Gases (Volume 6, Chapter 3: Climate Change Resilience Assessment and Volume 6, Chapter 4: Greenhouse Gases) are as follows:

NPF4

- Policy 1: Tackling the climate and nature crises;
- Policy 2: Climate mitigation and adaption;
- Policy 10: Coastal Development; and
- Policy 11: Energy.

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- Policy C2 Renewable Energy; and
- Policy C3 Carbon Sinks & Stores.

- 5.13.1.3 Policy 1, an overarching policy of NPF4, states that when considering all development proposals significant weight will be given to the global climate and nature crises. It is expected that there will be residual construction and decommissioning-related emissions associated with the Proposed Development however given the Proposed Development is by design reducing national emissions and helping the UK and Scotland achieve national carbon targets of net zero by 2050 and 2045 respectively by delivering circa 2GW of renewable energy, it is considered compliant with Policy 1.
- 5.13.1.4 Policy 2 (a) requires that development proposals are sited and designed to minimise lifecycle GHG emissions as far as possible.
- 5.13.1.5 Policy C2 supports renewable energy developments that are appropriately sited and designed, it states that the acceptability of such development will take account of effects on e.g. renewable energy targets, GHG emissions and carbon rich soils.
- 5.13.1.6 EIAR Volume 6, Chapter 4: Greenhouse Gases, provides a GHG emissions assessment and identifies how the development design has considered GHG and peatland impacts.
- 5.13.1.7 Where possible, embedded mitigation measures along with secondary measures have been proposed, such as minimising GHG emissions through the detailed design process. The overall significance conclusion for GHG emissions for the construction and decommissioning phases of the Proposed Development is minor adverse (not significant) due to the increase in emissions associated with construction/decommissioning materials and processes. The conclusion for the operation of the Proposed Development is significant beneficial due to the generation of low carbon electricity, aligning with IEMA guidance (IEMA, 2022). The provision of mitigation measures and adherence to best practice guidelines demonstrates compliance with Policy 2 (a) and Policy C2.
- 5.13.1.8 Policy 2 (b) requires that development proposals are sited and designed to adapt to current and future risk from climate change. EIAR Volume 6, Chapter 3: Climate Change Resilience (CCR) Assessment assesses the CCR of the Proposed Development. The CCR assessment identifies no significant effects, with the implementation of proposed embedded mitigation measures which included the design of assets to withstand different weather thresholds likely within the operational life of the Proposed Development and following best practice health and safety procedures. The CCR assessment and proposed mitigation measures demonstrate compliance with Policy 2(b).

- 5.13.1.9 Policy 10 aims to protect coastal communities and assets and support resilience to the impacts of climate change. Policy 10 (b)(i) states that development proposals that are necessary to support net zero emissions will be supported. The Proposed Development (Onshore) is essential enabling infrastructure required to facilitate the deployment of renewable energy infrastructure and therefore complies with Policy 10.
- 5.13.1.10 Policy C3 aims to protect carbon sink and stores and development proposal that may result in the loss of, or disturbance to peat will only be emitted if it can be demonstrated there will be no net effect on CO₂. There are no mapped peat deposits within the Onshore Substation Site. Where peat or carbon-rich soils cannot be avoided within the OnTI RLB, the Onshore Export Cable Route will be designed such that the effect of the peat hydrology and carbon losses are minimised, with the implementation of a Peat Management Plan. With the implementation of mitigation measures the potential effect on peat and carbon rich soils is assessed to be not significant. The Proposed Development therefore complies with Policy C3.
- 5.13.1.11 Overall, for the Proposed Development conclusions in regards GHG emissions are significant beneficial, when considering the needs case for helping the UK and Scotland achieve national carbon targets of net zero by 2050 and 2045 respectively.
- 5.13.1.12 It is therefore considered that the Proposed Development (Onshore) complies with Aberdeenshire LDP Policy C2, C3 and NPF4 Policies 1, 2 and 11.

6 Conclusions

- 6.1.1.1 Section 25 of the 1997 Act requires that an application for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.1.1.2 This planning application seeks PPP for the Proposed Development (Onshore) which forms part of the Caledonia OWF.
- 6.1.1.3 It is considered that the policy assessment provided in this Statement adequately demonstrates how the Proposed Development (Onshore) complies with both National and Local planning policy, notably the principle of development is supported by Policy 1: Tackling the climate and nature crises and Policy 11: Energy of NPF4 and Policy C2 within the Aberdeenshire LDP 2023.
- 6.1.1.4 The Proposed Development (Onshore) would provide the essential onshore infrastructure necessary to facilitate the export of circa 2GW of clean energy generated from the Caledonia OWF. As outlined in this Statement, through construction the Proposed Development will potentially create 3,720 jobs and contribute to Scotland’s just transition to net zero. The Proposed Development would make an important contribution in helping to achieve the climate change policy aims and legislative requirements. The Proposed Development will also contribute to both Scotland and the UK’s net zero targets as well as offshore wind overall delivery targets.
- 6.1.1.5 It is therefore considered that the principle of the Proposed Development (Onshore) is supported and complies with the Development Plan.
- 6.1.1.6 As detailed in this Statement, careful consideration has been given to potential impacts of the proposed development (onshore) on land use and agriculture; landscape and visual; ecology; biodiversity enhancement; built and cultural heritage; traffic and transport; hydrology and flood risk; geology, soils and contaminated land; noise; socioeconomic, tourism and recreation and climate change.
- 6.1.1.7 Overall, the Proposed Development (Onshore) is considered to be compliant with the NPF4’s presumption in favour of sustainable development and all technical matters have been assessed.
- 6.1.1.8 In addition to delivering clean, affordable and secure energy, addressing the impact of climate change and supporting the net zero agenda, the scheme will also result in job creation, biodiversity net gains, economic and community benefits.
- 6.1.1.9 In summary, the Proposed Development (Onshore) has designed and evolved taking into consideration the adopted Development Plan (Aberdeenshire LDP) and NPF4), and PPP should be granted accordingly.

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