



Caledonia Offshore Wind Farm

Planning Statement

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Document Notes

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Document History

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1 Introduction

This Planning Statement has been prepared to accompany a Planning Permission in Principle (PPP) application (the Application) and is submitted to Aberdeenshire Council (AC) by RPS, on behalf of Caledonia Offshore Wind Farm Limited (the Applicant).

The proposal is for the development of up to four 400 kilovolt (kV) underground cable circuits, connecting Caledonia Offshore Wind Farm Burnside Onshore Substations to the Scottish and Southern Energy Networks Transmission (SSEN-T) Greens Substation, together with associated works (the Proposed Development).

The Proposed Development description is as follows: *Up to Four 400 kilovolt (kV) underground cable circuits, connecting Caledonia Offshore Wind Farm Burnside Onshore Substations to the Scottish and Southern Energy Networks Transmission (SSEN-T) Greens Substation, together with associated works.*

The Proposed Development will be located within the submitted PPP application red line boundary (RLB) as shown on Location Plan ref UKCAL-RPS-03-ONE-REG-MAP-00001 on land between Maryhill and Greens, Turriff, AB53 6XT and AB53 5YQ, grid reference 382451, 846037, (the Site).

The Site is surrounded by agricultural land primarily used for pasture and arable farming, with a predominantly rural character. There is an area of commercial forestry to the north-west of the Site. Individual farmsteads and isolated dwellings are a typical feature of the setting, a number of which lie in close proximity to the Site.

The exact location of the underground cable route is not yet known. Therefore, it is the principle of a cable route within the application boundary that planning permission is sought for. The detailed cable route design will be submitted to Aberdeenshire Council for approval at Matters Specified by Condition (MSC) stage, once the detail design is finalised.

The Application is categorised as a national development by the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 and National Planning Framework 4 (NPF4). Annex B of NPF4 presents National Developments Statement of Need. National development 3 'Strategic Renewable Electricity Generation and Transmission Infrastructure' is required to support renewable electricity generation, repowering and expansion of the electricity grid in order to meet its net zero emissions targets in the whole of Scotland.

The Proposed Development falls under the definition of 'essential infrastructure' in NPF4 which includes '*all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations.*'

The Application has been subject to an Environmental Impact Assessment (EIA) screening process ref. ENQ/2025/0256 and AC adopted the opinion on the 20 March 2025 that the Proposed Development is not EIA development and significant environmental impacts are unlikely.

This Planning Statement: presents the Proposed Development and associated construction works; demonstrates the legislative and planning policy context within which the Proposed Development is considered; and provides an assessment against this planning policy context, alongside other material considerations.

Whilst the Planning Statement is drafted as a standalone document, it should be read in the context of the entire submission and supporting Environmental Appraisal to fully understand the Proposed Development, its potential impacts and planning merits.

1.1 Project Background

In January 2022, as part of the ScotWind leasing round, Ocean Winds UK Limited was successfully awarded an Option Agreement granting exclusive rights to develop an Offshore Wind Farm (OWF) within the NE4 Plan Option, which is located within the outer Moray Firth, off the north-east coast of Scotland.

Ocean Winds has progressed the proposals for this OWF, which has been named the Caledonia OWF, via the limited company of Caledonia Offshore Wind Farm Limited. Caledonia OWF is seeking to deliver electricity to the National Electricity Transmission System (NETS) from 2030. Due to the volume of national grid reinforcement works required to connect offshore wind projects and commercial drivers, the Applicant is expecting the Caledonia OWF to be developed in phases. In 2024, the Applicant submitted applications for Section 36 Consents and Marine Licences to Marine Scotland for the offshore components of the project. An application for PPP for the Onshore Transmission Infrastructure (OnTI PPP) was submitted to AC and approved (ref. APP/2024/1812) in July 2025. The OnTI PPP included a landfall point to the west of Whitehills, an onshore export cable route of approximately 37km and an onshore substation site, comprising two co-located onshore substations. The co-located onshore substations are to be located on land known as Burnside, situated immediately north of the existing SSEN-T New Deer substation.

The OnTI PPP states that the grid connection point to the NETS for the first phase of the Caledonia Development is expected to be the existing SSEN-T New Deer substation, with the second phase potentially connecting to the SSEN-T Greens substation. The requirement to connect to the existing SSEN-T New Deer substation and/or the SSEN-T Greens substation is subject to ongoing detailed network design (DND) being conducted by National Grid Electricity Energy System Operator (NESO) and SSEN-T, in consultation with the Applicant. Until the DND is finalised, there remains the possibility that both phases of the development may connect entirely into the Greens substation.

2 Proposed Development

2.1 Application Boundary Evolution

The development of the PPP application boundary was an iterative process which incorporated a wide range of information gathering through desk-based and walkover assessments. The RLB configuration evolved from a process which identified and avoided where feasible statutory and non-statutory designations, hard and soft constraints, whilst considering key design parameters and assumptions.

The following environmental, technical and landowner routing criteria were applied in development of the PPP application boundary:

- Avoidance of settlements and residential properties;
- Targeting the most direct route between Burnside and Greens substations;
- Avoiding peatland;
- Minimising the number of crossings and potential technical design conflicts with other assets;
- Allowing for flexibility around cable entry and exit points from the substations;
- Allowing for flexibility taking account of third party development RLB;
- Facilitating the future routing of cables in alignment with field headland; and
- Ensuring all cables could be undergrounded.

2.2 Proposed Development Overview

The Proposed Development will be located within the submitted PPP application RLB as shown on Location Plan Ref UKCAL-RPS-03-ONE-REG-MAP-00001. The RLB presented is wider than the actual corridor to provide flexibility for the detailed design of the cable route. Further details on the specific route within the Site will be provided at MSC stage.

The Proposed Development include the following elements:

- A working cable corridor up to 100 metres wide, accommodating all temporary works areas required for installation;
- Up to four 400 kV cable circuits installed in trenches;
- Up to two temporary haul roads;
- Haul road access points;
- Up to four Joint Bays for each cable circuit;
- Up to two Satellite construction compounds; and
- Temporary crossing infrastructure for haul road(s), road, watercourse and utilities

The parameters set out are presented to enable consideration and determination of PPP.

Further works to inform the final design will include a detailed review of potential crossing locations and arrangements in conjunction with cable designs to optimise civil and electrical design. Further to this, ground investigation works for the entire cable

corridor, with trial pits at agreed distances will be undertaken to ensure that any below ground level soil conditions, like shallow rock, are identified.

Trenchless crossings are not anticipated. Instead, open cut trench crossings are likely to be used (over roads and watercourse tributaries).

The cable corridor is proposed to be a maximum width of 100m, within which the underground cables and construction infrastructure would be located.

The cable route crosses agricultural land and following underground installation of the cables and ground reinstatement, there will be no long-lasting impacts. Land will be reinstated to its previous use but the position of the cables will be marked using marker posts for the safety of land users.

The cables will be installed below ground level and will remain underground post-operation, within the RLB.

2.3 Cable Corridor

The maximum cable corridor width will be 100m, the actual working cable corridor is likely to vary depending on constraints. Earth will be excavated during the construction process and stored alongside temporary access tracks.

The corridor has been designed to have a 20m spacing down the centre, to allow thermal separation, as well as a temporary haul road for construction.

2.4 Cable Arrangement

The proposed works consist of the installation of up to four 400 kV cable circuits routing between the Burnside substation site and Greens substation site.

Parallel circuits are anticipated with each circuit containing 2 cables per phase. Cables are anticipated to be spaced at 2 m and each circuit spaced at 20m to accommodate a potential access road between circuits.

Installation is expected to be a maximum depth of 2m. The project determined the maximum trench depth to be 2m, and 1m between the top of cable to soil surface, to allow agricultural work to continue following reinstatement.

2.5 Haul Roads and Access

Up to two temporary haul roads will be constructed to allow for the laying of the cabling. These are expected to be 5m in width. The combined width of single-track road plus passing bay for HGV would be 5.5m over a length of 15m. To reduce the overall length of the haul road(s) and required land-take, access will be made across the route via the public road network.

Access point suitability will be fully assessed at MSC stage using swept path analysis but are anticipated to be located at existing field entrances. Access for construction traffic and cable drum delivery will be confirmed at a later design stage. Four roads are crossed by the RLB, comprising both classified and unclassified roads. This could translate to 8 individual access points, one on each side of each road crossing the RLB.

It is anticipated the haul road(s) will cross two watercourses, identified as tributaries of the Burn of Greens.

2.6 Joint Bays

Cables will be joined at pre-determined jointing locations, known as jointing bays. The distance between jointing bays will vary, depending on topography, obstacles, and access. However, an average cable length of 800m has been determined at this stage based on the spacing between the jointing bays. It is assumed there is a jointing bay at every 800 m plus or minus 20%.

Jointing bay placement will be presented at MSC stage but is anticipated to mainly be within field boundaries and prior to any crossing points where possible. Jointing bays will be appropriately located to avoid adverse interactions with utilities.

A maximum of four jointing bays locations are anticipated.

Temporary Heras or other suitable protective fencing and gates of a suitable type will be installed at the jointing bay locations to ensure the construction area is protected from unauthorised access.

Temporary signage and notices are required to inform members of the public of the works. Temporary lighting may also be required during construction.

A single above ground link pillar is required within 10m of each joint bay, which would be protected by stock proof fence. Alternatively, a link box chamber could be installed underground. Marker posts or plates are required at joint bays and will need to be agreed with National Grid.

2.7 Satellite Construction Compounds

During construction works, there will be a requirement for temporary compounds along the length of the cable corridor. As part of the design methodology, it has been assumed that up to two satellite compounds will be required due to the short length of the cable route. The Applicant has assumed that a construction compound will be available for use by the Proposed Development, located within the extent of OnTI PPP application boundary, and in close proximity to the RLB. Therefore, to reduce the potential impacts associated with having a larger site compound, the Applicant does not propose to include a main compound. Therefore within the application RLB.

Satellite compounds are anticipated to be 30m x 15m and will be located close to access points.

2.8 Crossings

The cable route will require crossings, including but not limited to:

- Roads;
- Gas mains;
- Water mains;
- Other utilities; and,
- Small watercourses.

Should land drains be disturbed during construction, they will be temporarily diverted, and subsequently reinstated, to maintain hydrological conditions in the surrounding fields.

Tributaries of the Burn of Greens will be crossed by the cable. There have been no crossings identified at this stage that would require the use of trenchless crossing solutions, such as Horizontal Directional Drilling (HDD) techniques, hence Open Cut Trenching (OCT) is suggested as the construction methodology for the route as there are limited major crossing locations.

2.9 Construction

The construction program is anticipated to be 15 months long and has been assessed as such throughout the EA and assessments. There remains the possibility that this construction extends depending on other factors, such as seasonality of construction preparation works, weather effects, ground reinstatement and unforeseen factors.

Core working hours for construction of the Proposed Development will be typical working hours which are taken to be 7am to 7pm Monday to Friday and 7am to 1pm Saturday and for public holidays. This will also apply to the movement of Heavy Goods Vehicles (HGVs). Any instances of works being undertaken outside of normal working hours will be requested in advance by the Applicant and only undertaken if approved by Aberdeenshire Council's Environmental Health Officer (EHO).

2.10 Reinstatement

After the main construction activities have been finalised and infrastructure compliance with grid codes has been confirmed, temporary infrastructure such as haul roads will be removed along with satellite compounds, and the land will be reinstated to its previous use. Any boundary planting proposed at MSC stage for biodiversity enhancement and landscape will remain in situ as set out in the Outline Biodiversity Enhancement Report (OBER).

2.11 Operation

During operation, cable and associated infrastructure cabling will remain installed underground with no visible overground infrastructure, with exception of ground-level manhole covers where the joint bays are located. Farmland will have been reinstated, and agricultural operations will continue as they did prior to the construction stage.

2.12 Rochdale Envelope

The maximum design parameters used for the purposes of the Application are intended to incorporate the parameters for a typical installation assuming a 'worst-case' scenario. A 'Rochdale Envelope' approach to assessment has therefore been followed, whereby maximum design parameters are defined for PPP assessment. These maximum parameters would not be exceeded by the Proposed Development's final design at MSC stage in terms of its projected impacts during construction, reinstatement and operational phases. The final requirements for the Proposed Development will be assessed through further detailed consideration of the final corridor once known and brought forward at MSC stage. Due consideration for the parameters established through this application and the relevant supporting assessments undertaken will be made.

3 Procedural Matters

3.1 Screening Request

In accordance with Regulation 8 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, a developer may request the planning authority to adopt a Screening Opinion of a proposed development. On 28 February 2025, the Applicant requested a Screening Opinion from AC Planning Service. On the 20 March 2025, Aberdeenshire Council issued their Screening Opinion and stated that an 'Environmental Statement is not required'.

The screening process has two stages for the screening selection criteria; first, to identify the potential impacts of the Proposed Development based upon the characteristics of the development and its location; and, secondly, considering whether significant environmental effects are likely based upon the characteristics of the potential impacts. The selection criteria meets the requirements of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 – Schedule 3 for screening Schedule 2 development.

Firstly, the screening process had regard to the characteristics of the Proposed Development; including size, design, cumulative effects, natural resources, waste, pollution, accidents and risks; and, the location of the Proposed Development; including existing land use, abundance of natural resources, absorption capacity, environmental quality standards, populated areas and landscapes. The screening process found there to be no significant impact from the Proposed Development on any of these factors.

Secondly, the screening process considered the characteristics of the potential impact of the Proposed Development; including the magnitude and spatial extent of the impact, nature, transboundary effects, intensity, complexity, probability, onset, duration, frequency, reversibility, cumulative effects, and possibility of reducing the impact.

The screening process found there to be no significant effects from the Proposed Development on any of these factors.

3.2 Pre Application Consultation

The Applicant has conformed to, the requirements set out within the relevant legislation, including those contained within The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021. A Proposal of Application Notice (PoAN) was submitted on 27th of August 2025 to Aberdeenshire Council. Newspaper notices, a letter drop and two in person public consultation events were held on the 23rd September and 28th October 2025, where members of the project team discussed the Application with the stakeholders. Following Pre-Application Consultation (PAC) event 2, the project determined the maximum trench depth to be 2m, and 1m between the top of cable to soil surface, to allow agricultural work to continue following reinstatement. Full details of the PAC process, event feedback and the Applicant's response to feedback are provided in the PAC Report submitted in support of the Application.

3.3 Application Submission

PPP is being sought for the Proposed Development. This is a common approach for developments of this nature. The approach establishes the principle of development

within a range of maximum parameters, subject to compliance with planning policy, before the detail of the proposal is further illustrated and assessed at MSC stage.

The application is accompanied by the following, in line with Regulation 10 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013:

- a written description outlining the development to which it relates;
- a description of the location of the land;
- the name and address of the applicant and agent;
- accompanying plan sufficient to identify the land to which it relates and showing the situation of the land in relation to the locality and in particular in relation to neighbouring land;
- a description of the location of the access points to the Proposed Development;
- a PAC report;
- appropriate fee; and
- ownership certificate as required under Regulation 15 of these regulations.

In addition, the application is also accompanied by an Environmental Appraisal (EA) comprising standalone reports considering relevant potential impacts resulting from the Proposed Development and appropriate mitigation at this stage. Specific topics within the EA are listed below. These were informed by the Applicant's experience of other similar projects, site conditions and the characteristics of the proposal, which in turn provide the basis for the planning appraisal set out within this document.

- Air Quality;
- Terrestrial Ecology;
- Geology, Soils and Contaminated Land;
- Archaeology and Cultural Heritage;
- Noise and Vibration;
- Traffic and Transport; and
- Flood Risk and the Water Environment.

In addition to the above, the planning submission suite is supported by an Outline Construction Environment Management Plan (OCEMP), Outline Construction Traffic Management Plan (OCTMP) and Outline Biodiversity Enhancement Report (OBEP).

4 Application Site

The Site is located approximately 6km to the southeast of Turriff and 4km to the south-west of New Deer, on land between Maryhill and Greens, Turriff, AB53 6XT and AB53 5YQ, grid reference 382451, 846037.

4.1 Site Description

The Site covers 157 ha and is surrounded by agricultural land primarily used for pasture and arable farming, with a predominantly rural character. There is an area of commercial forestry to the north-west of the Site. Individual farmsteads and isolated dwellings are a typical feature of the setting, a number of which lie in close proximity to the Site.

Key features include:

- **Watercourses:** The Burn of Greens and Little Water flow east of the Site. A tributary of the Burn of Greens flows along and within the northern area of the Site. A pond and second tributary of the Burn of Greens lies centrally within the Site.
- **Infrastructure:** New Deer Substation adjoins the southern boundary. Within the Site, a road connects Burnside crossroads to the north. To the east of this road is Mains of Asleid, with arable land, hedgerows, an overhead line (OHL), and a single wind turbine to the north. South of the road, extending east toward Netherton of Greens, are the Neuk and Abbotshaugh farmsteads.
- **Vegetation:** Beech trees and hedges occur near the Site, with hawthorn hedges commonly forming field boundaries.
- **Surrounding Roads:** Large arable fields lie north of the crossroads near Maryhill. The road north from the crossroads is lined in places with trees and cottages. To the north of Burnside substation are pole-mounted OHLs, paddocks, and the road extending west from Burnside crossroads. A road from Borderside to Northburnmill and arable land lies south of the Greens substation site.

4.2 Statutory and Non-statutory Designations

There are no statutory or non-statutory designated sites within the Site.

Designated sites located in proximity to the Proposed Development have been listed below. A 20km radius is the applied search area for sites of International Importance (e.g. Special Areas of Conservation (SAC), Special Protection Area (SPA), Ramsar sites).

A radius of 2km has been applied for sites of National or Regional Importance (e.g. Sites of Special Scientific Interest (SSSI), protected or otherwise notable species and non-statutory designated sites of County Importance).

There are 2 no. statutory designated sites located within 20km of the Proposed Development. The closest statutory designated site is the Turclossie Moss SAC, approximately 11.6km from the Proposed Development. The Troup, Pennan and Lion's Heads SPA is located approximately 17km north of the Proposed Development.

There are no non-statutory designated sites within 2km of the Proposed Development.

The closest non-statutory designated site is the Windy Hills SSSI, located c. 5km to the south-west.

4.3 Planning History and Cumulative Development

The Site is surrounded by a number of proposed energy and transmission projects at various stages in the planning and consenting process, due to intended connections to either New Deer or Greens substations.

In conjunction with these, a new OHL is proposed (developed by Scottish and Southern Electricity Networks Transmission ((SSEN-T)) Beauly, Blackhillock, New Deer and Peterhead, which will connect in and out of bays along the northern elevation of Greens.

Abbotshaugh Battery Energy Storage System (BESS) is proposed adjacent to the east of the Neuk. New Deer BESS, to the west of Greens substation is also proposed. Both are under consideration by the Energy Consents Unit (ECU).

The Proposed Development RLB partially overlaps with the OnTI PPP and Greens substation, due to the requirement to connect the cable to import and export bays of both. The Site also overlaps the application boundaries of Abbotshaugh BESS and New Deer BESS, the latter of which takes in the Greens substation footprint. The Site also overlaps with the application boundary of Stromar offshore wind farm onshore assets, although this application is at an early stage in the planning and consenting process i.e. at scoping stage. A degree of overlap is expected, given the nature of project and required connections into substations.

A proportionate approach has been taken in the EA’s assessment of cumulative impacts. Approved projects or projects approved or in planning have been prioritised in the assessment where impacts are considered most likely. Applications at screening and scoping stage have been omitted from the assessment due to their early stage in the consenting process, likely refinement through optioneering and limited available information. This PPP will be refined during the MSC stage and will be subject to conditions which require the construction phase to be managed and this will include the potential construction overlap with other projects.

Table 4.1 below lists the planning history on and adjacent to the Site of most relevance to the application, this was originally informed by a 5km search area. Applications either consented and in planning are considered with the exception of Stromar offshore wind farm, which despite its early stages in the consenting process is included for context.

Application Ref.	Description of Development	Site	Status	Distance from Site
APP/2024/1812	Onshore Transmission Infrastructure for Caledonia Offshore Wind Farm including Formation of Onshore Landfall Point, Laying of Underground Cables, Erection of 2 Co-located Substations, and Associated Works to connect to the Transmission Grid	Boyndie Bay To New Deer	Approved 04 July 2025	0.0km

Application Ref.	Description of Development	Site	Status	Distance from Site
APP/2024/1927	National for Erection of 400kV AC Substation and Associated Infrastructure	Land At Mains Of Greens	Approved 8 October 2025	0.0km
ECU00005224	Construction and operation of a proposed BESS (over 50MW) and associated substation with associated infrastructure, access and ancillary works.	Abbotshaugh BESS	Under Consideration	0.0km
ECU00006067	Construction and operation of a Battery Energy Storage System (BESS) along with associated infrastructure and ancillary works, earthworks, access, drainage, landscape and biodiversity enhancement.	New Deer 2 BESS, Land Near Wagglehill North And South, Cuminstown	Application	0.0km
APP/2023/1454	National for Formation of Onshore Landfall Point, Laying of Underground Cable and Erection of Substation	Land From North Of Peterhead To South Of New Deer Green Volt Offshore Windfarm Aberdeenshire	Consented. Discharge app APP/2025/179 1 for decommissioning and archaeological scheme of investigation.	Adjacent southwest boundary
ECU00002137	SSE has had a request for a new supply at the SSE Transmission site adj to Upper Mains of Asleid, New Deer. To accommodate the new supply it is proposed to supply a second customer via a high voltage underground cable from the overhead line which supplies East Swanford.	East Swanford, New Deer	Consented 22 Dec 2020	South of Proposed Development
ECU00005165	Section 37 application for the construction of a new double circuit steel structure 400 kV OHL between Beaully, Blackhillock, New Deer and Peterhead, approximately 194km in length, including the diversion of an existing 400kV OHL into a proposed new Coachford 400kV substation near	Beaully to Blackhillock to New Deer to Peterhead 400kV OHL	Application	0.5km North of Proposed Development to north elevation of Greens substation

Application Ref.	Description of Development	Site	Status	Distance from Site
	Blackhillock, removal of the existing 132kV OHL from Beauly to Knocknagael substations, and rationalisation and crossings of the existing transmission network.			
ENQ/2024/0039	Onshore Development (Scoping Opinion)	Stromar Offshore Wind Farm Landfall Between Rosehearty And Fraserburgh To New Deer	Scoping Opinion Adopted 31 st January 2024 and addendum 3 rd April 2024	0.0km

5 Legislative Context

5.1 Electricity Act 1989

The Applicant holds a generation licence and in formulating the application it has had regard to the environmental duties set out in sub- paragraphs 3(1) and (3) of Schedule 9 of the Electricity Act 1989.

5.2 Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Scotland) Act 1997 is the primary legislation for the planning system in Scotland, on land down to Mean Low Water Spring (MLWS), and effectively sets out how the system should operate. Key objectives are listed as ensuring the sustainable use of land, promoting sustainable economic development, encouraging regeneration as well as maintaining and enhancing heritage assets including those of a natural and cultural description.

The 1997 Act also includes requirements for PAC with communities for all major and national developments.

5.3 Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009

Under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 classes of development belonging to the category of major developments are described within the Schedule.

National developments are classes of development designated as such under the National Developments Statements of Need are set out in National Planning Framework 4 (NPF4) by virtue of Section 3A(4)(b) of the Town and Country Planning (Scotland) Act 1997. Through NPF4, applications classed as 'major' but which fall within distinct categories within NPF4 are then classed as 'national' developments.

5.4 The Climate Change (Scotland) Act 2009

The Climate Change (Scotland) Act 2009 was a landmark piece of legislation aimed at reducing greenhouse gas emissions in Scotland and set targets for a sustainable future. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 amended the 2009 Act and replaced interim targets with carbon budgets.

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

The processing of any planning application in Scotland will be carried out under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (Development Management Regulations) which set out and detail each step of the planning process and outline necessary requirements throughout, from pre application to post determination.

5.6 Planning (Scotland) Act 2019

The Planning (Scotland) Act 2019 introduced a range of changes to the planning system. Among the most profound and relevant of these is the changed scope and status of

Scotland's NPF4, which has become an all-encompassing national planning framework and policy document, superseding Scottish Planning Policy and Strategic Development Plan policy and now forming part of the development plan.

Under the Planning (Scotland) Act 2019, in the event of any incompatibility or conflict between the NPF4 and the relevant Local Development Plan, whichever is the later in date is to prevail. In this case NPF4 is the later in date.

5.7 The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021

These regulations amend the Development Management Regulations and set out the requirements for PAC, specifically the requirement for a minimum of two public events spaced in excess of 14 days apart.

5.8 Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

The Act amends the Climate Change (Scotland) Act 2009 primarily by replacing the system of annual and interim emissions reduction targets, which are focussed on Scottish emissions of greenhouse gases in a given year, with a system of periodic carbon budgets that are focussed on emissions over five year periods.

The Climate Change Committee issued its advice on the 5 yearly budgets to the Scottish Government on 21 May 2025 as follows:

57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).

69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).

80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).

94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

5.9 Draft Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025

The Draft Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 set legally binding carbon budgets for Scotland for the periods 2026–2030, 2031–2035, 2036–2040, and 2041–2045. These five-year budgets replace previous annual targets and support Scotland's net-zero goal by 2045. The regulations require Scottish Ministers to prepare climate plans aligned with these budgets, ensuring strategic and accountable emissions reductions.

6 Planning Policy

6.1 The Development Plan

Under section 24 of the Town and Country Planning (Scotland) Act 1997, the development plan for an area is to be taken as consisting of the provisions of:

- a. the National Planning Framework (NPF),
- b. any strategic development plan for the time being applicable to the area, together with:
 - i. the Scottish Ministers' notice of approval of that plan, and
 - ii. any supplementary guidance issued in connection with that plan, and
- c. any local development plan (LDP) for the time being applicable to the area.

In this case the development plan therefore comprises (1) NPF4 and (2) Aberdeenshire Local Development Plan adopted on the 13 of January 2023.

Under the Planning Act 2019, in the event of any incompatibility or conflict between the NPF4 and the relevant LDP, whichever is the later in date is to prevail. In this case NPF4 is fractionally later in date.

6.2 National Planning Framework 4

NPF4 was published on 13 February 2023 and sets out the spatial principles, regional priorities, national developments and national planning policy. NPF4 replaces NPF3 and should be read in its entirety as it represents the national spatial strategy for Scotland, and forms part of the development plan.

NPF4 plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals.

Support for sustainable development and tackling climate change are at the heart of the NPF4. Addressing the climate and nature crises, and minimising greenhouse gas emissions, should be considered within both plan-making and decision-making (Policy 1 and Policy 2).

NPF4 designates 18 National Developments which are set out as being of national importance. This includes high voltage electricity cables of 132 kV or more.

National Development type 3 'Strategic Renewable Electricity Generation and Transmission Infrastructure' specifically supports renewable electricity generation, repowering, and expansion of the electricity grid in all parts of Scotland. Where the Proposed Development (as is the case here) involves new high voltage cables above 132 kV then the development is classed as being a national development. The need for this type of development is derived from a recognition that upgrading the electricity transmission network is fundamental to achieving a net zero economy.

Annex B of NPF4 sets out a Statement of Need for these developments which describes the support in place for these projects. In the case of large-scale energy transmission projects, National Development type 3 states that across the entirety of Scotland:

- This national development supports renewable electricity generation, repowering, and expansion of the electricity grid;

- The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions.
- Specifically in terms of need - Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas. Island transmission connections in particular can facilitate capturing the significant renewable energy potential in those areas as well as delivering significant social and economic benefits.

Therefore, when a proposed development is classified as being a national development, there is an agreed status of being of national importance as well as an established need for the project to progress. Furthermore their designation means that the principle of the development does not need to be justified in later consenting processes however projects should take into account all relevant policies.

Part 2 of NPF4 sets out the National Planning Policies which set out the requirements for developments and Local Planning Authorities to tackle climate change, promote sustainability, reduce carbon emissions.

NPF4 also defines what is known as essential infrastructure as including 'all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations'. This adds emphasis to the national importance of such proposals.

The policies relevant to the Proposed Development are highlighted below.

Policy 1: Tackling the Climate and Nature Crisis

The policy encourages local planning authorities, to give significant weight to the global climate and nature crisis when considering all development proposals.

The policy is aimed to reduce carbon emissions and promote developments that address the global climate emergency and nature crisis.

Policy 2: Climate Mitigation and Adaptation

The policy sets out requirements for proposed developments in order to reduce emissions over the course of the development's lifecycle. The policy also requires developments to be sited and designed in order to adapt to current and future risks from climate change.

Policy 3: Biodiversity

The policy highlights the importance of biodiversity and the key role it plays in the national spatial strategy. The policy sets out requirements for developments to illustrate the steps taken to enhance, restore and preserve habitats, integrate nature based solutions where feasible, understand the local natural setting, and mitigate cumulative impacts on the surrounding environment. There is an emphasis on the enhancement of biodiversity through development.

Policy 5: Soils

Policy 5 aims to protect carbon rich soils, restore peatland and minimise soil disturbance. Proposals must adhere to the mitigation hierarchy of avoidance then minimising

disturbance. Proposals for essential infrastructure will be supported for where there is a specific locational need and no other suitable site.

Policy 4: Natural places

Development proposals will only be supported if they are designed and constructed in accordance with the mitigation hierarchy and in a manner that protects soil from damage. Development proposals on peatland, carbon-rich soils and priority peatland habitat is supported when intended for certain specified types of development including essential infrastructure with a specific locational need and renewable energy generation. Detailed site-specific assessment will be required to identify baseline depth, habitat condition, quality and stability of carbon rich soils, likely effects on peatland and soil disturbance, and likely net effects on climate emissions and loss of carbon.

Policy 6: Forestry, woodland and trees

Development proposals that enhance, expand and improve woodland and tree cover will be supported. Development proposals will not be supported where they will result in any loss of ancient woodlands, ancient & veteran trees, native woodlands or adverse impact on their ecological condition. Woodland removal will only be supported where significant and clearly defined additional public benefits can be demonstrated.

Historic assets and places

Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Policy 11 Energy

Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, including enabling works such as grid transmission and distribution infrastructure. Proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Design and mitigation should demonstrate how development impacts have been addressed, but when considering impacts significant weight should be placed on the contribution towards renewable energy generation and greenhouse gas emissions reduction targets.

Policy 20: Blue and green infrastructure

Development proposals for or incorporating new or enhanced blue and/or green infrastructure will be supported. Proposals that result in fragmentation or net loss of existing blue and green infrastructure will only be supported where it can be demonstrated that the proposal would not result in or exacerbate a deficit in blue or green infrastructure provision, and the overall integrity of the network will be maintained.

Policy 22: Flood risk and water management

Development proposals at risk of flooding or in a flood risk area will only be supported if they are for essential infrastructure where the location is required for operational reasons. Proposals should not increase the risk of surface water flooding, manage rain and surface water through Sustainable Drainage Systems (SuDS) and presume no surface water connection to the combined sewer.

Policy 23: Health and Safety

Development proposals which are likely to have a significant adverse effect on health or air quality, or raise unacceptable noise issues, will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality. The agent of change principle applies to noise sensitive development.

Policy 29: Rural Development

Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including essential infrastructure.

6.3 Aberdeenshire Local Development Plan 2023

The Aberdeenshire Local Development Plan (ALDP) was adopted in 2023 and comprises the plan and appendices. Planning advice has been prepared to accord with NPF4. The advice is not statutory guidance and does not form part of the ALDP.

The policies relevant to this proposal include:

Policy R2 Development Proposals Elsewhere in the Countryside – This policy relates to the siting and design of new development in the countryside.

Policy P1 Layout, Siting and Design – The Policy states that proposals for national development should meet the prescribed level of public and stakeholder engagement. Biodiversity enhancement measures are required in proportion to the opportunities available and scale of development. Off-site contributions are acceptable when it is not practical to meet these onsite and a location near to the site is preferable in these circumstances. Site Waste Management Plans are required to demonstrate the minimisation of waste during construction.

Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land – The Policy states that a development will be refused if there is a risk that it could cause significant pollution or create significant nuisance (air quality or noise). Pipelines, agricultural buildings, wastewater treatment plants, waste disposal/treatment facilities and heavy industrial uses are all examples of development that could create a nuisance, pollution or hazard. Contaminated land is considered under P4. Where an Air Quality Assessment or a Noise Impact Assessment indicates that a proposed development could have a significant detrimental impact on air quality or noise levels, appropriate mitigation measures must be provided.

Policy E1 Natural Heritage – The Policy aims to deliver protection and enhancement of Aberdeenshire’s natural environment and landscape. Development should integrate measures to protect and enhance biodiversity and landscape. Specifically, E1 seeks to protect designated sites. On protected species E1 states a Protected Species Survey is required to inform assessment. The submission of Species Protection Plans detailing appropriate avoidance and mitigation measures may be required.

Policy E2 Landscape – The Policy states that development that causes unacceptable effects through its scale, location or design on key characteristics, natural landscape elements, features or the composition or quality of the landscape character will be refused. Development, in terms of its location, scale, design, materials and landscaping, should be of a high quality.

Policy E3 Forestry and Woodland – The Policy E3 protects trees and woodlands. Strong protection is provided for trees and woodlands. There is a presumption against the

removal of safe and healthy trees, and hedgerows. Development is also required to continue to ensure that opportunities are taken to promote the role of woodlands.

Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings) – The Policy states that development that would have an adverse impact on the character, integrity or setting of listed buildings, or scheduled monuments, or other archaeological sites will be resisted. If adverse impact is unavoidable, it should be minimised and justified. Development on nationally or locally important monuments or archaeological sites, or having an adverse impact on the integrity of their setting, will only be allowed if there are exceptional circumstances, including those of a social or economic nature, and there is no alternative site. It is the developer's responsibility to provide information on the nature and location of the archaeological features, including details of any mitigation measures proposed

Policy PR1 Protecting Important Resources - The Policy states that developments that have a negative effect on important environmental resources associated with air quality, the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space, and important trees and woodland will only be permitted when public economic or social benefits clearly outweigh any negative effects on the protected resource, and there are no reasonable alternative sites.

Policy C2 Renewable Energy - The Policy states that a renewable energy developments, including solar, wind, biomass and hydroelectricity projects, as well as energy storage projects, which are in appropriate sites and of the appropriate design, will be supported subject to assessment.

Policy C4 Flooding - The Policy states that a Flood Risk Assessments should be undertaken in accordance with SEPA Technical Flood Risk Guidance and will be required for development in the indicative medium to high category of flood risk of 0.5% or greater annual probability (1 in 200 years or more frequent).

Policy RD1 Providing Suitable Services – The PolicyRD1 considers sustainable transport linkages and supporting infrastructure, amongst other matters. When development requires the formation of new accesses, these should be designed to the agreed standard, and must be resource-efficient, safe and convenient for cyclists, pedestrians and public transport. New accesses should also cause minimal impact on the character of the site and surrounding area and satisfactory arrangements for future maintenance of these access facilities should also be made. Developers should be aware of the Aberdeenshire Standards for Road Construction Consent and Adoption, and the need for Roads Construction Consent in most instances. A Transport Assessment or Transport Statement may be asked for, to demonstrate that the development (and any proposed mitigation measures) will not have significant transport impacts on existing transport infrastructure and services.

6.3.1 Aberdeenshire Local Development Plan 2028

Aberdeenshire Council have started working on the new Aberdeenshire Local Development Plan which is expected to be adopted in 2028. At this point it is not a material consideration in decision making.

6.4 Other Material Considerations

Chief Planners Letter – April 2025 highlights the need for Planning Authorities to be proportionate when considering suspensive conditions for all forms of renewable developments and associated enabling works including transmission and distribution

infrastructure. The following are potentially material considerations. NPF4, however, already incorporates the policy imperatives included within them.

The Climate Change (Scotland) Act 2009 (as amended).

Draft Energy Statement and Just Transition Plan, January 2023 which will replace the Scottish Energy Strategy and associated Position Statement (2021) upon adoption.

7 Planning Appraisal

7.1 Principle of Development

7.1.1 NPF4 National Developments

The Proposed Development falls under national development type 3 Strategic Renewable Electricity Generation and Transmission Infrastructure and meets class b) new onshore high voltage cables of 132kv or more. The designation of the Proposed Development as a national development means that the principle of the development does not need to be agreed later in the consenting process.

Electricity generation and associated grid infrastructure is supported throughout Scotland and is recognised as providing employment and opportunities for community benefit, whilst helping to reduce carbon emissions and improve security of supply. The Proposed Development supports progress towards a zero carbon economy and is therefore supported by the National Spatial Strategy for Scotland given by part 1 of NPF4.

7.2 Part 2 NPF4 Policy

Notwithstanding the above compliance with NPF4 in terms of the need for the Proposed Development and wider principle of the development being established through national development 3, NPF4 also contains a suite of specific policies which require to be adhered to as part of a wider assessment against the Development Plan.

7.2.1 Policies 1, 2, 11 and 29

Policies 1, 2 and 11 of NPF4, cover tackling the climate crisis and afford significant weight to proposals which reduce emissions and provide support for large scale renewable energy generation and related electricity transmission infrastructure. The policies are considered to provide support for and be satisfied by the Proposed Development. As above, the Proposed Development would provide high voltage energy transmission infrastructure (underground cabling) which will in turn facilitate the generation of around 2 GW of renewable energy through Caledonia OWF.

Specifically in terms of Policy 11, the proposal is covered by the classifications of development supported under 11(a) being nationally important transmission infrastructure. Project design and mitigation is comprehensive and robust throughout the submission and where necessary adopts a precautionary approach. The Proposed Development is not EIA development and no significant adverse effects on the environment have been identified as confirmed by AC. The EA confirms that with the application of mitigation measures no significant unacceptable impacts will occur. The EA demonstrates there are no significant adverse impacts arising in terms of environmental receptors which would preclude development with reference to parts i-xiii of 11(e).

Similarly, Policy 29, which concerns rural development, is supportive of the development of essential infrastructure and can be considered to be satisfied in terms of the principle of development.

This group of policies require that significant weight is given to the global climate and nature crisis in decision-making. They provide clear support for the Proposed Development which plays a significant role in helping Scotland to meet net zero by 2045.

The Proposed Development by its nature facilitates adaptation to renewable sources of energy generation, is strategically located to facilitate connection between two approved substations and will enable National Grid to function in response to ongoing DND.

7.2.2 Policies 3, 4, 6 and 20

This group of policies covers Biodiversity, Natural Places, Forestry, Woodland and Trees and Blue and Green Infrastructure respectively. All are primarily concerned with the protection and enhancement of the natural environment through the preservation and enhancement of natural environments, demonstrating no adverse impacts and protecting of designated sites. As demonstrated in the EA, in particular Appendix C together with the supporting Biodiversity Enhancement Report (BER), the Applicant has responded to constraints to ensure the Proposed Development results in no significant adverse impacts upon protected species, habitats and, generally, the natural environment. Appropriate ecological mitigation for any impacts are set out throughout the EA and demonstrated to be acceptable. Appropriate mitigation is set out in order to further prevent and limit adverse impacts. Furthermore, as demonstrated in the BER and enhancement measures within, the Proposed Development can further demonstrate positive net gain credentials.

It is considered that the principle of biodiversity enhancement and leaving sites in a better pre-development condition can be achieved. This is based on the understanding of the habitat to be impacted through the PPP application boundary and taking into account any potential losses. Much of the enhancement will be achieved by not only restoring but improving habitats that may be affected by construction, but also through habitat planting along field boundaries in order to allow productive agriculture to resume following reinstatement. Off site mitigation will be considered as necessary and build on the onshore PPP if appropriate or beneficial. Further details will be provided through subsequent MSC stages when the exact route is refined.

7.2.3 Policy 5

Policy 5 covers soils. Land Capability for Agriculture maps show that the soils fall within classes 3.1, 3.2 and 4.1. No peat lies in the PPP application boundary. Generally, the development on peatland or such soils is supported by the policy where this is for essential infrastructure, as is the case here. As set out in the EA specifically Appendix D, the mitigation hierarchy can be demonstrated to have been complied with through the design evolution process, where assessment at feasibility stage informed the selection of the PPP application boundary.

The Proposed Development complies with 5 (c) (i), whereby the definition of essential infrastructure has been met and there is a specific locational need to connect Burnside substation to Greens.

There is also further opportunity to limit interactions through the detailed cable route design at MSC stage. These steps are considered to allow for compliance with this of policy. Under wider consideration, no adverse impacts upon soils are anticipated, soil will be managed in accordance with best practice to avoid compaction and erosion and once reinstated, the land will revert to productive farmland. As such, the proposal can be considered to comply with this policy.

7.2.4 Policy 7

Policy 7 covers the historic environment and seeks to ensure that new development does not adversely impact the historic fabric of an area. To this end, as demonstrated

through Appendix E to the EA, the Proposed Development is not anticipated to result in any significant adverse impacts upon cultural heritage or below ground archaeology within or within the vicinity of the PPP application boundary. There is the potential for disturbance of 5 crofts through construction works, but the detailed design will, as far as reasonably practicable, avoid impacts upon non-designated heritage assets. Where this is not possible the physical loss of heritage assets will be offset through a programme of archaeological works. This will allow for the identification and appropriate excavation and recording of archaeological remains within the construction footprint of the Proposed Development. The scope of the programme of archaeological works will be set out in a Written Scheme of Investigation (WSI) agreed with Aberdeenshire Council Archaeology Service. Appropriate archaeological mitigation has been set out to manage this. As such, the proposal is considered to comply with this policy.

7.2.5 Policy 22

Flooding is a key factor in NPF4 and new development should not increase the risk of flooding, whereas any development with a proposed risk can only be supported in certain circumstances, including where it involves essential infrastructure. In this instance, as demonstrated through Appendix H to the EA, no flooding issues or concerns are raised and as such the proposal can be considered to comply with this policy.

7.2.6 Policy 23

NPF4 Policy 23 covers Health and Safety and covers noise and air quality impacts arising from the developments. Appendix B and Appendix F to the EA consider the impacts of the Proposed Development on these topics. Temporary construction and operationally, would be experienced within the locality. However, expected mitigation is set out in order to address these outputs to ensure that these do not become significant. Mitigation would be secured via condition on the PPP application and then fully detailed, designed and agreed at the MSC stage. Consequently, the proposal is considered to comply with this policy.

Consequently, it is concluded the Proposed Development complies with the principles of NPF4 and which should be afforded significant weight in the planning balance.

7.3 ADLP Policy

7.3.1 Policy P1

Policy P1 requires development to be appropriately designed and is largely aligned to settlement design, masterplanning or built development. Policy aspects that relate to the Proposed Development are considered below.

Appropriate consultation has been undertaken in accordance with The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021 and other relevant legislation. Full details are set out in the PAC report that supports the Application.

The OBER sets out measures to enhance biodiversity in proportion to the opportunities likely to be available in accordance with the stage and scale of the Proposed Development. Further opportunities will be identified through the progression of design evolution to detailed design stage and a final Biodiversity Enhancement Report (BER) will be submitted to AC for approval at MSC stage.

A construction Site Waste Management Plan (SWMP) can be provided which would set out measures in line with the waste hierarchy for, inter alia, haul road removal and

reinstatement. SWMP's promote opportunities for reuse and reprocessing of materials and products. Accordingly, the Proposed Development complies with Policy P1.

7.3.2 Policy P4

P4 considers pollution and nuisance. The scale and nature of the Proposed Development does not warrant advice from the Health and Safety Executive (HSE) the Competent Authority (in the case of Control of Major Accident Hazardous sites) nor does it lie in close proximity to existing hazardous developments.

The Site comprises productive farmland for arable cultivation and grazing. Consequently, there is no known contaminated land. Appendix D to the EA supports this conclusion stating there is no artificial ground mapped within the application boundary. Historic mapping dating from 1840 to 1961 shows land use as predominantly arable farmland with pockets of moorland. The current use aligns with historic use, the land remains as productive farmland and no adverse issues are anticipated.

Air quality and noise assessments support the Application as Appendices B and F to the EA respectively. Impacts are restricted locally and temporally and only relevant to the construction phase. Construction dust impacts are not anticipated to be significant. With implementation of the mitigation and good practice measures recommended in the noise assessment, including compliance with relevant standards and robust site management controls, the residual noise and vibration impacts of the Proposed Development are expected to be temporary and localised. No significant impacts are anticipated.

In accordance with P4, appropriate air quality and noise mitigation measures will be provided, and compliance can be demonstrated.

7.3.3 Policy E1

E1 seeks to protect designates sites and protected species. There are no designated sites on or within proximity to the Site. An Ecological Appraisal inclusive of a Protected Species Walkover Survey supports the Application as Appendix C to the EA.

An extended Habitat Classification Survey was undertaken on the site on 19th August and 29th September 2025. Alongside the Habitat Classification Survey, the Site was appraised for evidence of, and its potential to support, protected or notable species, especially those listed under The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), those given extra protection under Section 2 of the Nature Conservation (Scotland) Act 2004, and species included in the North East Scotland Biodiversity Partnership 4 Year Strategic Plan 2022-2026. Full details are set out in Appendix C of the EA.

At this stage there is sufficient survey detail to confirm the presence of protected species including badger, roosting bats, and nesting birds, in and around the site. Where protected species may potentially be impacted, further surveys will be undertaken to fully inform the proposals, mitigation, and, if necessary, European Protected Species Licence (EPSL) obtained. Potential impacts and mitigation on habitats and protected species are included within the EA and OCEMP, ensuring works follow good practice and precautionary approaches.

As mobile species, sett/roost/nest locations may have changed by MSC stage and so further survey work is necessary to avoid and mitigate against any potential impacts.

There is sufficient detail at this stage however to confirm presence and establish the principle of development however, through compliance with E1 by virtue of the surveys

undertaken, identification of presence, outlining of proposed next steps and ultimate avoidance/mitigation to be incorporated into the project design.

Species Protection Plans will be prepared as appropriate once the final route is known and consequently avoidance or mitigation can be ensured. Land within the Site falls within AC's Forestry Strategy highlighting pockets of land as Preferred Areas for Woodland Creation. The OBER confirms woodland creation is likely to be feasible on site. No woodland loss is expected therefore the Proposed Development demonstrably complies with E1.

7.3.4 Policy E2

There will be no long term or permanent impacts on the natural landscape, or landscape character as a result of the Proposed Development. The construction phase has been assessed as 15 months. Construction phase operations associated with the Proposed Development, temporary satellite compounds and haul roads, will have a localised, short-term impact on the area. Construction impacts will be reversible and once operational there will be no visible trace or surface expression of the cable. The Proposed Development complies with E2.

7.3.5 Policy E3

There is no plantation forestry or other woodland on Site. There are some roadside trees within the RLB, Beech and Ash being the most abundant species. Hedgerows form some field boundary treatments but are sporadic in nature and predominantly of hawthorn species. Mature trees and hedgerows will be retained where feasible, together with suitable buffers / root protection zones. Where this is not possible, construction working widths will be minimised as far as possible and compensatory planting would be required. This would include the creation of native hedgerows, native deciduous woodland, and mixed native woodland planting and provide a net gain as set out in the OBER.

There will be no woodland loss and woodland creation will be considered in line with AC's Preferred Areas for New Woodland Creation. The Proposed Development conforms to E3.

7.3.6 Policy HE1

Appendix F to the EA considers archaeology and cultural heritage. There are no designated heritage assets within the Site. Given that the Proposed Development will have no surface expression during its operational phase, it is considered that there is no potential for it to result in change in the setting of designated assets. It is therefore concluded that there is no potential for impacts upon designated heritage assets.

The assessment has identified five Post-Medieval crofts within the Site that may be affected by the Proposed Development. These are considered to be of local importance. In addition, it is considered that there is potential for hitherto unrecorded archaeology to be present within the Site. For the purposes of the Application, it has been assumed that any heritage assets within the Site will be removed during the construction phase of the Proposed Development. However, the detailed design will, as far as reasonably practicable, avoid known heritage assets thereby preserving them in situ.

The physical loss of heritage assets within the Site would be offset through a programme of archaeological works. The scope, if required, would be set out in a Written Scheme of Investigation agreed with Aberdeenshire Council's archaeological advisors. Consequently, the Proposed Development satisfies the requirements of HE1.

7.3.7 Policy PR1

Air quality has been considered under NPF4 Policy 23 and ADLP P4, prime agricultural land under NPF4 Policy 5 and trees and woodlands under NPF4 Policy 6 and ADLP E3.

The Application considers the effects on waterbodies and the water environment in Appendix H to the EA. An assessment of the impacts had identified that in the absence of mitigation there was the potential for moderate impacts during the construction phase of the Proposed Development. A mitigation strategy has been proposed based on best practice, industry standards and sound design principals particularly in relation to watercourse crossing construction methodologies. The proposed strategy will ensure that the proposed works will have a negligible to minor impact on the water environment. The operation stages of the development will have a minor impact on water quality and channel hydromorphology due to the design of the watercourse crossings which will be in accordance with the Scottish Environment Protection Agency (SEPA) guidance. This will ensure that the environmental objectives of the Water Framework Directive (WFD) surface water body to which these tributaries drain, the Little Water/Black Burn River, will not be compromised.

Consequently, the Proposed Development has been demonstrated to conform with PR1.

7.3.8 Policy C2

C2 provides support for renewable energy developments. The Proposed Development although not a renewable energy development as defined by C2, will facilitate the connection and distribution of 2GW of renewable energy to homes across Scotland and the UK. This is a not an insignificant amount of renewable energy. The Proposed Development is appropriately sited between two substations, aims to take the most direct route, will be subject to micro siting to avoid constraints and relates to Caledonia Offshore Wind Farm and the OnTI PPP which has an existing planning permission.

7.3.9 Policy C4

Flooding is considered in Appendix H to the EA, and the appraisal under NPF4 Policy 22. No flooding issues or concerns are raised and as such the proposal can be considered to comply with C4.

7.3.10 Policy RD1

RD1 considers sustainable transport linkages and supporting infrastructure, amongst other matters. Appendix G to the EA considers traffic and transport. The traffic generation associated with the construction phase has been assessed in detail, considering the monthly, daily and hourly traffic flows during construction and taking into account predicted future traffic flows. The most onerous construction month (month 8) has been considered within the assessment to ensure the most robust analysis of the proposal. The peak month is predicted to generate an average of 5no. HGV movements per hour (assuming a 12no. hour working day). There will also be 30no. staff arriving by car to the site in the AM peak hour and 30no. staff departing by car the site in the PM peak hour. This does not consider the possibility and likelihood of car sharing by employees.

Based on the future baseline traffic flows and the construction vehicles predicted during the peak month is unlikely to have a significant impact upon the surrounding highway network.

The Applicant would look to participate in a forum with other developments in the locality of the Proposed Development to share detailed information on topics with

potential for cumulative interest. The Applicant considers that this may be a future vehicle to share information on specific traffic matters and allow mitigation to be developed which avoid cumulative impacts on the local traffic network. The Applicant would look to provide information to this forum, and include the resulting measures within the final CTMP, to provide the Planning Authority the security that cumulative impacts can be mitigated, monitored and enforced.

Therefore, based on the information presented above the Proposed Development will not have a significant impact upon the surrounding highway network during the construction phase. The Proposed Development has therefore been demonstrated to comply with RD1.

8 Conclusion

A PPP is sought for the Proposed Development. The key focus of the planning application and associated submission is therefore to clearly establish that the principle of development is acceptable in terms of planning policy.

As set out through the preceding paragraphs, the designation of the Proposed Development as a National Development clearly defines the need for the Proposed Development in planning terms. As a national development, the principle of the development does not need to be agreed later in the consenting process and the need for the development type is established.

The Proposed Development supports progress towards a zero-carbon economy and is therefore supported by the National Spatial Strategy for Scotland given by part 1 of NPF4. Furthermore, significant weight is afforded to the Proposed Development by NPF4 Policy 1.

Similarly, NPF4 Policy 11 affords significant weight to proposals which reduce carbon emissions and improve security of supply through support for large scale renewable energy generation and related electricity transmission infrastructure. The Proposed Development would provide high voltage energy transmission infrastructure (underground cabling) which in turn facilitates the generation and distribution of around 2 GW of renewable energy.

In the wider context the nature crises will be addressed through meeting net zero targets and more directly through the delivery of biodiversity enhancement. Compliance with NPF4 Policy 3 and ADLP E1 are achieved through appropriate mitigation to further prevent and limit adverse ecological impacts. There is sufficient detail at this PPP stage to establish the principle of development however, through compliance with Policy 3 and E1 by virtue of the surveys undertaken, identification of presence, outlining of proposed next steps and ultimate avoidance/mitigation to be incorporated into the project design at MSC stage. It is considered that the principle of biodiversity enhancement and leaving sites in a better pre-development condition can be achieved.

The Proposed Development will play a significant role in aiding the decarbonisation of Scotland's electricity, bolstering security of supply and achieving the pressing 2045 net zero targets. The Proposed Development is essential infrastructure that will enable increased production of energy from renewable sources. Taking this into account, the principle of the Proposed Development, can be proven to be acceptable in planning and environmental terms and has been demonstrated to be compliant with all relevant Development Plan Policy.

There are no material considerations which would outweigh the development plan compliance.

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