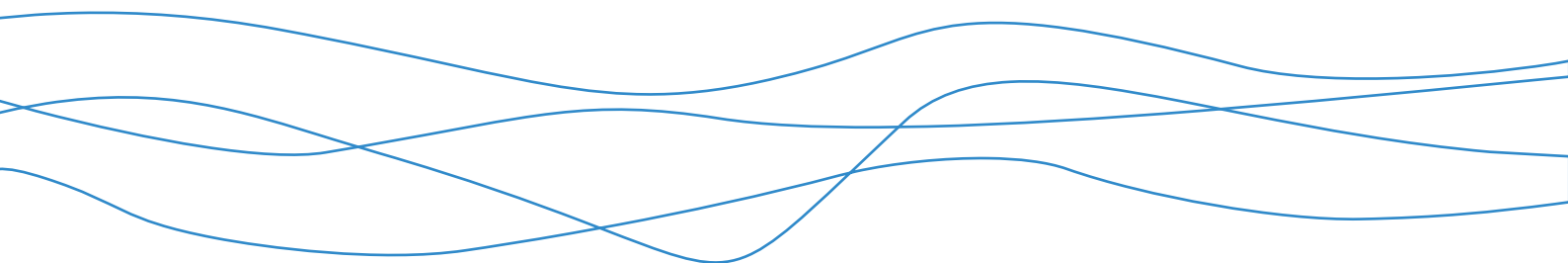




# **Bowdun Offshore Wind Farm, Onshore Infrastructure**

## Planning Statement

TWP-BOW-JCB-CON-RPT-00002 | November 2025



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# 1 Introduction

## 1.1 Background

- 1.1.1 This Planning Statement supports an application for Planning Permission in Principle (PPP) for onshore transmission infrastructure associated with the Bowdun Offshore Wind Farm including formation of onshore landfall point, laying of underground cables, erection of substation, and associated works to connect to the transmission grid (hereafter referred to as the Proposed Development) at Haughs Bay, Benholm connecting to Fetteresso Forest, Aberdeenshire.
- 1.1.2 The onshore and offshore elements of the Bowdun Offshore Wind Farm (the Bowdun Offshore Windfarm as a whole) is referred to as ‘the Project’ throughout the remainder of this Planning Statement.
- 1.1.3 The Proposed Development relates to the onshore infrastructure of the Project which is landward of Mean Low Water Springs (MLWS). An application is therefore made to Aberdeenshire Council for PPP for the Proposed Development under the Town and Country Planning (Scotland) Act 1997 (as amended).
- 1.1.4 The offshore elements of the Project (seaward of Mean High Water Springs (MHWS)) will be the subject of separate applications to the Scottish Government Marine Directorate Licensing Operation Team. The offshore applications will be accompanied by a separate Environmental Impact Assessment Report (the Offshore EIA Report).
- 1.1.5 The Proposed Development is classified as National Development under the provisions of National Planning Framework 4 (NPF4). Annex B of NPF4 – National Developments Statement of Need, 3. ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’ includes the classification: *‘New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.’*
- 1.1.6 As required in respect of National Development, the applicant submitted a Proposal of Application Notice (PoAN) (submitted 16 July 2025) and community consultation was undertaken. The accompanying Pre-Application Consultation Report summarises and documents the community consultation undertaken.
- 1.1.7 NPF4 Annex B National Developments Statements of Need states the following in relation to National Development 3 ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’:  
  
‘This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.  
  
A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable energy generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity

helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new and 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.’

1.1.8 In terms of need NPF4 states the following in relation to National Development 3:

‘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.’

## **1.2 The Applicant**

1.2.1 Thistle Wind Partners (TWP) is a Joint Venture (JV) between DEME Concessions, Quar Marine and Aspiravi International. Together, the TWP partners have a strong background in offshore renewable energy development and delivery, and associated port developments. TWP established the Bowdun Offshore Wind Farm Limited (BOWFL) as a Special Purpose Vehicle (SPV) (legal entity) for the Project. TWP is the development company for BOWFL and BOWFL is the applicant for the PPP application to Aberdeenshire Council for the Proposed Development.

## **1.3 Scotwind Leasing Round and the Project**

1.3.1 In 2020, Crown Estate Scotland (CES), launched the ScotWind leasing process to facilitate the increase in offshore wind capacity to support the Scottish Government’s 2045 Net Zero target. Following the ScotWind leasing round in 2022, on entering into an Option Lease Agreement (OLA) with CES, the Applicant secured the rights to develop a commercial scale Offshore Wind Farm (OWF) project in the E3 Plan Option Area (POA) as defined in the Scottish Government’s Sectoral Marine Plan (SMP) for Offshore Wind Energy. The Bowdun Offshore Wind Farm array area where the Wind Turbines will be situated, is located approximately 38 km from the Aberdeenshire coast at its closest point. The offshore and onshore transmission assets include the necessary infrastructure to export the generated electricity to the UK national electricity transmission network (the National Grid). The anticipated installed capacity of the Project is up to 1,008 Megawatts (MW).

## **1.4 National Grid Connection**

1.4.1 TWP has applied to connect the Project to the electricity transmission network which is operated by Scottish and Southern Electricity Networks Transmission (SSEN-T) in the Aberdeenshire Council area. The National Energy System Operator (NESO), previously known as the National Grid Energy System Operator

(ESO), operates the UK wide electricity system coordinating and managing grid connections.

- 1.4.2 In July 2022, National Grid ESO published the Pathway to 2030 Holistic Network Design (HND), which set out the approach to connecting 50 Gigawatt (GW) of offshore wind to the UK electricity network. In addition, it detailed the first stage of the design and offshore wind grid connection. The grid connection for the Project was determined subsequently, as part of the second stage of the design known as the Holistic Network Design Follow Up Exercise (HND-FUE) at a new SSEN-T substation to be constructed (referred to hereafter as ‘Hurlie Substation’). SSEN-T submitted a planning application for the Hurlie Substation to Aberdeenshire Council in December 2024 (ref: APP/2024/1951).

## **1.5 Planning Permission in Principle Approach**

- 1.5.1 This Planning Statement supports an application for PPP. The Applicant, through the submission of the application for PPP seeks to establish the principle of developing the onshore infrastructure within the PPP application boundary.
- 1.5.2 On this basis, a Project Design Envelope (PDE) approach is adopted in the Environmental Impact Assessment (EIA) Report. This approach is common practice to assist with the need for flexibility. Utilising the PDE approach provides flexibility in the design of a project and allows for assessment of a likely maximum design scenario to enable a robust assessment of the likely significant effects of the Proposed Development in the EIA.
- 1.5.3 The final design specifications of the various elements of the Proposed Development would be submitted to Aberdeenshire Council as applications for approval of matters specified in conditions (MSC) at that stage.

## **1.6 Environmental Impact Assessment (EIA)**

- 1.6.1 An EIA has been undertaken for the Proposed Development in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 to assess the likely significant environmental effects of the Proposed Development. The scope of the EIA was informed by a formal EIA scoping opinion issued by Aberdeenshire Council on 24 October 2024 (Aberdeenshire Council ref. ENQ/2024/1337).
- 1.6.2 The assessments presented in the Onshore EIA Report have informed the policy appraisal set out in this Planning Statement.

## **1.7 Structure of this Statement**

- 1.7.1 Following this introductory section, this Planning Statement is structured as follows:
- Section 2 summaries the site selection process undertaken by TWP during the design process to identify the siting of the Proposed Development and provides a description of the application site location.
  - Section 3 provides a summary of the Proposed Development.
  - Section 4 contains an appraisal of the Proposed Development against relevant policies of the statutory Development Plan and related guidance.
  - Section 5 sets out energy policy considerations.

- Section 6 provides an overview of other material considerations.
- Section 7 presents overall conclusions.

## 2 Site Selection and Site Location

### 2.1 Introduction

2.1.1 This section summarises the site selection process undertaken by TWP during the design process to identify the siting of the Proposed Development and provides a description of the application site location.

### 2.2 Summary of Site Selection

2.2.1 A summary of the site selection process is provided in this section. A full description of the site selection process and consideration of alternatives is contained in the Onshore EIA Report, Volume 1, Chapter 5: Site Selection and Reasonable Alternatives Considered.

#### Overarching Site Selection Strategy

2.2.2 The site selection strategy had several overarching requirements:

- Identify landfall locations which minimised impact on areas of environmental sensitivity, proximity to the offshore wind infrastructure and existing onshore grid infrastructure and be technically and geologically suitable.
- Identify suitable Substation sites which included being in proximity to the proposed Grid Connection Point (GCP)/existing transmission infrastructure, stable ground conditions, avoidance of flood risk areas and minimised impacts to sensitive habitats.
- Identify onshore cable route corridors from landfall to substation sites considering the environmental and technical constraints.
- Provide an initial assessment of onshore environmental cable routing from landfall to onshore grid connection point.
- Undertake walkover surveys, identifying and documenting environmental constraints identified.
- Adhere to the established HND appraisal methodologies.

2.2.3 A constraints analysis exercise was carried out to determine various environmental and technical constraints such as:

- Special Protection Areas
- Designated Heritage Assets
- Local Nature Conservation Sites
- Challenging topography
- Local infrastructure (including underground gas pipelines, the Forties Oil Pipeline and existing overhead power lines).

2.2.4 The constraints analysis exercise allowed early identification of areas to avoid as well as potential substation and landfall sites.

2.2.5 Site options for landfall, onshore export cable corridors and substation sites were then assessed as described in the Onshore EIA Report Chapter 5: Site Selection and Reasonable Alternatives Considered.

## **2.3 Site Location**

- 2.3.1 The PPP application boundary covers an area of approximately 807 hectares. The PPP application boundary is shown in Figure 2.1 in the Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development.
- 2.3.2 In general terms, the PPP application boundary runs from Haughs Bay near Benholm in an approximately northerly direction passing through the wider Arbuthnott and Drumlithie areas to the Fetteresso Forest.
- 2.3.3 The area from the coastline to Fetteresso Forest is predominantly an agricultural and rural landscape, characterised by rolling hills and occasional deeply incised valleys with steep topography. Fetteresso Forest is predominantly a commercial coniferous woodland.
- 2.3.4 The PPP application boundary is located outside of settlement boundaries as defined by the Aberdeenshire Local Development Plan (LDP). Residential properties have generally been avoided by the PPP application boundary. There are two residential properties situated within the PPP application boundary: Threewells Cottage and Kirkton of Arbuthnott Farm house. Their inclusion is due to the proximity of the property to a proposed access.
- 2.3.5 The A90 trunk road, the A92 trunk road, the B967 and several local roads are located within the PPP application boundary. The PPP application boundary includes existing third-party infrastructure including high pressure gas, fuel and oil pipelines. The Edinburgh to Aberdeen railway line is located within the PPP application boundary.

## **3 The Proposed Development**

### **3.1 Introduction**

3.1.1 This section provides a summary of the Proposed Development. A detailed description of the Proposed Development is provided in the Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development.

### **3.2 The Proposed Development**

3.2.1 The Proposed Development comprises the following onshore components landward of MLWS:

- Landfall and Transition Joint Bays (TJBs) – this is the location in which the Offshore Export Cables come ashore and are jointed to the Onshore Export Cables within the TJBs;
- Onshore Export Cable Corridor – the area within which the 220/275 Kilovolt (kV) Onshore Export Cables will be located; this runs from the Landfall area to the Substation site;
- Substation – the proposed Substation containing the components for transforming the power supplied from the Project from 220/275 kV up to 400 kV;
- 400 kV Cable Corridor – the area within which the 400 kV Cables will be located providing the onward transmission to the grid; this connects the Substation to the Hurlie Substation; and
- The temporary ancillary onshore infrastructure required for the construction phase of the Onshore Export Cable Corridor, 400 kV Cable Corridor and the Substation (such as construction compounds and access routes).

3.2.2 The Substation is required in order to connect to the National Grid and ensure the power is grid compliant. The Substation will be located within Fetteresso Forest, approximately 250 m north-east of the SSEN-T Hurlie Substation.

3.2.3 The Proposed Landfall area is located at Haughs Bay near Benholm where the Offshore Transmission Assets from the Bowdun Offshore Wind Farm will be brought to shore. The Proposed Development will not include any overhead cabling, with all transmission cables being buried underground.

## 4 Development Plan Assessment

### 4.1 Introduction

4.1.1 The Town and Country Planning (Scotland) Act 1997 (as amended) ('TCPA') requires decisions on planning applications to be made in accordance with the Development Plan unless material considerations indicate otherwise.

4.1.2 The Development Plan comprises:

- National Planning Framework 4 (NPF4), adopted on 13 February 2023; and
- Aberdeenshire Local Development Plan, adopted on 13 January 2023.

4.1.3 Section 13(2)(3) of the Planning (Scotland) Act 2019 amended Section 24 of the Town and Country Planning (Scotland) Act 1997 to state: *'in the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date will prevail.'*

4.1.4 The Scottish Government's Chief Planner issued a letter on 08 February 2023 entitled 'Transitional Arrangements for National Planning Framework 4'. It provides advice on NPF4 becoming part of the statutory Development Plan alongside Local Development Plans. The letter is also intended to support consistency in decision making ahead of new style Local Development Plans being in place.

### 4.2 National Planning Framework 4

#### Background

4.2.1 National Planning Framework 4 (NPF4) provides the National Planning Framework for Scotland and National Planning Policy.

4.2.2 Part 1 of NPF4 sets out the national spatial strategy and regional spatial priorities for five broad regions of Scotland.

4.2.3 Six overarching spatial principles are outlined: just transition; conserving and recycling assets; local living; compact urban growth; rebalanced development; and rural revitalisation.

4.2.4 Under the 'Spatial principles' heading NPF4 states that application of these spatial principles *'will support the planning and delivery of:*

- **sustainable places**, where we reduce emissions, restore and better connect biodiversity;
- **liveable places**, where we can all live better, healthier lives; and
- **productive places**, where we have a greener, fairer and more inclusive wellbeing economy.'

4.2.5 Part 2 of NPF4 sets out national planning policies under the three themes of: Sustainable Places, Liveable Places, and Productive Places. Each policy provides Policy Intent, Policy Outcomes, and a Local Development Plan section which discusses the expected role of LDPs for each topic.

4.2.6 The policy section, which is for use in determining planning applications, is then provided. In relation to the policy sections, Page 98 of NPF4 states:

‘The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies.’

- 4.2.7 Following the policy section, NPF4 provides statements on Policy Impact and then Key Policy Connections which are intended to show the key connections between policies.

### **National Developments**

- 4.2.8 NPF4 Annex A (on page 97 of NPF4) states that:

‘Eighteen national developments have been identified. These are significant developments of national importance that will help to deliver the spatial strategy. They are intentionally high level and focus on key elements, as the projects are at different stages.

National development status does not grant planning permission for the development and all relevant consents are required.

Their designation means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors.’

- 4.2.9 It states further that:

‘In addition to the statement of need at Annex B, decision makers for applications for consent for national developments should take into account all relevant policies.’

- 4.2.10 NPF4 Annex B contains further details regarding National Developments including the Statements of Need. It states on page 99 that:

‘National developments are significant developments of national importance that will help to deliver our spatial strategy.’

- 4.2.11 It states further on page 99 that:

‘The statements of need set out in this annex are a requirement of the Town and Country Planning (Scotland) Act 1997 and describe the development to be considered as a national development for consent handling purposes.’

### **National Development 3: Strategic Renewable Electricity Generation and Transmission Infrastructure**

- 4.2.12 NPF4 Annex B National Developments Statements of Need states the following in relation to National Development 3 ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’:

‘This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.

A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable energy generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new and 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.'

4.2.13 The location for National Development 3 is stated as '*all Scotland*'. In relation to need for National Development 3, Annex B includes the following:

'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.'

4.2.14 The Proposed Development is categorised as a National Development under the provisions of NPF4, which establishes the status of being a development of national importance that will contribute to the delivery of the Spatial Strategy contained in NPF4. The Proposed Development is of a scale or type that would otherwise have been classified as 'major' by The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 and falls within the classification: '*New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.*'

#### **NPF4 Policy**

4.2.15 The most relevant NPF4 policies to the Proposed Development include the following:

- Policy 1: Tacking the climate and nature crises.
- Policy 2: Climate mitigation and adaption.
- Policy 3: Biodiversity.
- Policy 4: Natural places.
- Policy 5: Soils.
- Policy 6: Forestry, woodland and trees.
- Policy 7: Historic assets and places.
- Policy 10: Coastal development.
- Policy 11: Energy.
- Policy 14: Design, quality and place.
- Policy 20: Blue and green infrastructure.
- Policy 22: Flood risk and water management.
- Policy 23: Health and safety.

- Policy 25: Community wealth building.

4.2.16 Parts of these policies that are relevant to the appraisal of the Proposed Development against the policies are considered below. The appraisal of the policies starts with Policy 11 Energy as this is the lead NPF4 policy for energy transmission infrastructure proposals.

#### **NPF4 Policy 11: Energy**

4.2.17 The Intent of Policy 11 is ‘To encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).’

4.2.18 The Policy Outcomes are: ‘Expansion of renewable, low-carbon and zero emissions technologies.’

4.2.19 Policy 11 states:

*‘a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*

- i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;
- ii. enabling works, such as grid transmission and distribution infrastructure;
- iii. energy storage, such as battery storage and pumped storage hydro;
- iv. small scale renewable energy generation technology;
- v. solar arrays;
- vi. proposals associated with negative emissions technologies and carbon capture; and vii. proposals including co-location of these technologies.

b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.

c) Development 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.

d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;
- ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

- iii. public access, including impact on long distance walking and cycling routes and scenic routes;
- iv. impacts on aviation and defence interests including seismological recording;
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;
- vii. impacts on historic environment;
- viii. effects on hydrology, the water environment and flood risk;
- ix. biodiversity including impacts on birds;
- x. impacts on trees, woods and forests;
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;
- xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and
- xiii. cumulative impacts.

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity.'

#### ***Appraisal - NPF4 Policy 11***

##### *Policy 11(a)*

- 4.2.20 The Proposed Development will contribute to the expansion of renewable energy delivery. Policy 11 Part (a)(ii) makes it clear that the policy supports enabling works such as grid transmission and distribution infrastructure. As such the Proposed Development can draw in-principle support from Policy 11.

##### *Policy 11(c)*

- 4.2.21 In terms of part (c) of Policy 11, guidance in the Scottish Government Chief Planner's letter of 20 September 2024 provides clarification regarding the application of Policy 11(c) and on the role of community benefits alongside policy considerations on maximising economic impact. The letter includes the statement that:

‘We recognise that there is some ongoing debate about the application of Policy 11(c) and on the role of community benefits alongside policy considerations on maximising economic impact. The Scottish Government is clear that community benefits are a well-established and integral part of onshore renewable energy developments in Scotland, supported by the Scottish Government’s Good Practice Principles. We are, however, clear that these are voluntary arrangements that sit independent of our planning and consenting systems, and NPF4 policy 11(c) does not alter this.’

4.2.22 An assessment of socio-economic effects has been undertaken as part of the EIA and is presented in Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation of the Onshore EIA Report. Investment in the Project is expected to create jobs, stimulate local industries, and boost economic activity in manufacturing, engineering and infrastructure.

4.2.23 Impacts on Gross Value Added (GVA) and employment were assessed for the combined onshore and offshore elements of the Project. The socio-economic assessment sets out that across the full project lifecycle, it is expected that under the ‘Commitments’ scenario, the Project would support:

- 488 full-time equivalent (FTE) jobs, and generate £597 million GVA in the North East region;
- 1,393 FTE jobs, and generate £1,705 million GVA in Scotland; and
- 4,170 FTE jobs, and generate £2.2 billion GVA across the UK.

4.2.24 The Applicant is committed to continuing its engagement with local suppliers and encouraging growth in the regional and Scottish supply chain.

*Policy 11(d)*

4.2.25 Part (d) of Policy 11 confirms that development proposals that impact on international or national designations will be assessed in relation to NPF4 Policy 4. Appraisal of the Proposed Development with regard to NPF4 Policy 4 is examined under the relevant heading below.

*Policy 11(e)*

4.2.26 Part (e) of Policy 11 states that ‘*project design and mitigation will demonstrate how*’ impacts are addressed. The Proposed Development is appraised against the factors in Policy 11(e) below.

Policy 11(e)i

4.2.27 The PPP application boundary is located outside of settlement boundaries as defined by the Aberdeenshire LDP.

4.2.28 As described in the Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access, residential properties have generally been avoided by the PPP application boundary, however there are two residential properties situated within the PPP application boundary: Threewells Cottage and Kirkton of Arbuthnott Farm house. Their inclusion is due to the proximity of the property to a proposed access.

4.2.29 Table 8.19 of the Onshore EIA Report, Volume 1, Chapter 8: Landscape and Visual Impact Assessment provides a visual assessment of the construction and

operation and maintenance phases on the visual receptors within the settlements which fall within the landscape and visual impact assessment study area. The settlements of Arbuthnott, Benholm, Buckie's Mill & Newmill, Drumlithie, Gourdon, Inverbervie, Johnshaven, Rickarton, and Tannachie are considered in this assessment. Significant effects from the Proposed Development on visual amenity would be moderate (significant) during construction at one settlement (Tannachie).

- 4.2.30 Impacts of the Proposed Development on individual residential properties is assessed in the Onshore EIA Report, Volume 2, Appendix 8.2: Visual Assessment of Individual Dwellings and Property Clusters. Significant visual effects during the construction phase would be experienced at 18 individual dwellings and property clusters, arising mostly due to their proximity to the construction works or due to unrestricted views of the construction works and associated traffic. During the operation and maintenance phase significant effects would be experienced by residents of one individual dwelling; Westerton of Bogheadly, near Rickarton where there would be a moderate (significant) visual effect at the winter of the year of opening, reducing to not significant by summer 12 years after opening when mitigation planting would have helped visual integration of the Proposed Development into the surrounding landscape.
- 4.2.31 A noise and vibration assessment which assesses the likely significant effects arising from the construction and operation of the Proposed Development is provided in Onshore EIA Report, Volume 1, Chapter 13: Noise and Vibration. Following the implementation of mitigation measures, there are predicted to be no significant residual adverse effects from construction noise or vibration or construction traffic. Similarly, there are no predicted significant cumulative effects from noise or vibration from other developments with the Proposed Development. Impacts and effects from decommissioning would be similar to those from construction and are not assessed as significant. The design of the substation includes embedded noise reduction measures, i.e. the incorporation of barriers and enclosures to meet operational noise limits, as a result there would be no significant effects at the closest receptors during the operation of the Substation. There are no expected significant effects from the maintenance of the Onshore Export Cable Corridor or the Substation.
- 4.2.32 Shadow flicker impacts are not relevant to the Proposed Development.
- Policy 11(e)ii
- 4.2.33 This part of Policy 11 recognises that significant landscape and visual impacts are to be expected for some forms of renewable energy. Secondly it makes clear that where impacts are localised and/or appropriate mitigation has been applied, they will generally be considered to be acceptable.
- 4.2.34 Onshore EIA Report, Volume 1, Chapter 8: Landscape and Visual Impact Assessment presents the results of the landscape and visual assessment.
- 4.2.35 The route and design of the Proposed Development have been developed through an iterative process involving engineering, environmental and landscape specialists to minimise potential visual effects and integrate the Proposed Development with the surrounding landscape. As part of the design

embedded landscape mitigation measures have been developed to help reduce visual impacts.

- 4.2.36 The Southeast Aberdeenshire Coast Special Landscape Area is a local landscape designation which covers the southern extents of the landscape and visual assessment study area and comprises a narrow strip running along the Aberdeenshire Coastline from Portlethan to Montrose Bay. The PPP Application Boundary falls within this designation.
- 4.2.37 There are two Garden and Designed Landscapes (GDL) located within the landscape and visual study area; Arbuthnott House GDL and Glenbervie House GDL which both lie to the west of the PPP Application Boundary and at approximately 450 m and 410 m respectively from the indicative 220/275 kV cable centreline.
- 4.2.38 Three Conservation Areas (CA) lie within the landscape and visual assessment study area outwith the PPP Application Boundary. Benholm CA lies approximately 400 m to the south of the indicative 220/275 kV cable centreline, Johnshaven CA lies approximately 2 km to the south and Kirkton of Fetteresso CA lies approximately 4.8 km to the east, on the western edge of Stonehaven.
- 4.2.39 As described in the landscape and visual assessment in the Onshore EIA Report, as part of the Proposed Development design process, a number of embedded mitigation measures have been proposed to reduce the potential for landscape and visual impacts.
- 4.2.40 The summary of the significant effects identified in the landscape and visual assessment are set out below.
- 4.2.41 Significant effects from the Proposed Development on landscape character would be limited to the construction stage with Moderate effects upon Landscape Character Type (LCT) 24, arising from construction activities such as the removal of vegetation, the construction of structures and the introduction of construction traffic. No other significant effects on landscape character or on landscape designations are predicted to occur either during the construction phase or the operation and maintenance phase.
- 4.2.42 Significant effects from the Proposed Development on visual amenity during the construction phase would be Moderate at one settlement (Tannachie), two core paths (Coastal Path: Johnshaven to Gourdon/ NCN 1 and Mid Kinmonth Circular) and the local path network in Fetteresso Forest. Significant effects would be reduced at the operation and maintenance phase to users of the local path network at Fetteresso Forest who would experience a moderate (significant) visual effect at the winter of the year of opening, reducing to not significant by summer 12 years after opening when mitigation planting would have helped visual integration of the Proposed Development into the surrounding landscape.
- 4.2.43 Additionally, significant visual effects during the construction phase would be experienced at 18 Individual dwellings and property clusters, arising mostly due to their proximity to the construction works or due to unrestricted views of the construction works and associated traffic. During the operation and maintenance phase significant effects would be experienced by residents of

one individual dwelling; Westerton of Bogheadly, near Rickarton where there would be a moderate (significant) visual effect at the winter of the year of opening, reducing to not significant by summer 12 years after opening when mitigation planting would have helped visual integration of the Proposed Development into the surrounding landscape.

- 4.2.44 Significant effects from the Proposed Development on visual amenity during the construction phase would be experienced at six of the eight representative viewpoints, reducing to two during the winter of the year of opening and one by the summer 12 years after opening (following the establishment of mitigation planting).
- 4.2.45 Significant cumulative effects on landscape character within LCT 24 are predicted during the winter of the year of opening when the effects associated with two other projects (Hurlie Substation and Glenskinnan Renewable Energy Park) are considered in combination with the effects associated with the Proposed Development, reducing to not significant by the summer 12 years after opening (following the establishment of mitigation planting). Significant cumulative effects on landscape character within LCT 29 are predicted during both the winter of the year of opening and the summer 12 years after opening when the effects associated with three other projects (Hurlie Substation, Glenskinnan Renewable Energy Park and Craigneil Wind Farm) are considered in combination with the effects associated with the Proposed Development.
- 4.2.46 Significant cumulative visual effects are predicted to be experienced by people travelling along the local path network in Fetteresso Forest and at Viewpoint 6 during both the winter of the year of opening and the summer 12 years after opening when the effects associated with five other projects (Hurlie Substation, Tealing to Kintore Overhead Line, Glenskinnan Renewable Energy Park, Fetteresso Wind Farm and Craigneil Wind Farm) are considered in combination with the effects associated with the Proposed Development.
- 4.2.47 Significant cumulative visual effects are predicted to be experienced by people at Viewpoint 5 during the winter of the year of opening, reducing to not significant by the summer 12 years after opening (following the establishment of mitigation planting) when the effects associated with one other project (Glenskinnan Renewable Energy Park) are considered in combination with the effects associated with the Proposed Development.
- 4.2.48 Significant cumulative visual effects are predicted to be experienced by people at Viewpoint 8 during the winter of the year of opening when the effects associated with three other projects (Tealing to Kintore Overhead Line, Glenskinnan Renewable Energy Park and Craigneil Wind Farm) are considered in combination with the effects associated with the Proposed Development. These combined cumulative effects would remain significant by the summer 12 years after opening for one of the projects (Craigneil Wind Farm) and would reduce to not significant for the other two.
- 4.2.49 The landscape and visual assessment presented in the Onshore EIA Report describes how specific mitigation measures to prevent, reduce and offset landscape and visual impacts will be developed at later stages during the

detailed planning and design process. Although specific mitigation measures cannot be detailed at the PPP stage, some specific mitigation measures expected to be incorporated are described in the landscape and visual assessment presented in the Onshore EIA Report such as planting design which would be implemented to aid integration of the Proposed Development into the existing woodland setting.

- 4.2.50 Policy 11 is clear that significant landscape and visual impacts are to be expected. Whilst significant landscape and visual effects have been identified in the Onshore EIA Report these are considered to be localised. The Proposed Development is considered to be in line with this policy.

Policy 11(e)iii

- 4.2.51 A public access assessment is included in the Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access. As part of the design process for the Proposed Development, a number of embedded mitigation measures have been proposed to reduce the potential for impacts on public access. The location and geographical extent of the PPP Application Boundary has been designed to avoid public access routes where reasonably practicable. Embedded Mitigation includes the use of trenchless cabling techniques (e.g. Horizontal Directional Drilling (HDD) to help avoid prolonged closure of public access routes. Residual (temporary) effects impacting WCH routes and access to outdoor areas are expected, however, these are not considered to be significant in EIA terms. Operation and maintenance and decommissioning phases of the Proposed Development are scoped out of the public access assessment as significant effects are not considered to be likely.

Policy 11(e)iv

- 4.2.52 Impacts on aviation and defence interests including seismological recording are not anticipated for the Proposed Development.

Policy 11(e)v

- 4.2.53 Impacts on telecommunications and broadcasting installations are not anticipated for the Proposed Development.

Policy 11(e)vi

- 4.2.54 Onshore EIA Report, Volume 1, Chapter 14: Traffic and Transport presents the assessment of the traffic and traffic impacts of the Proposed Development.

- 4.2.55 The assessment concludes that with the implementation of proposed mitigation measures, no significant effects arising from the Proposed Development are anticipated.

Policy 11(e)vii

- 4.2.56 Onshore EIA Report, Volume 1, Chapter 9: Cultural Heritage presents an assessment of the effects of the Proposed Development on heritage assets comprising archaeological remains, historic buildings and the historic landscape.

- 4.2.57 No likely effects have been assessed for designated heritage assets during either the construction phase or operation and maintenance phase.

4.2.58 Before additional mitigation, potentially significant adverse effects during construction were identified for seven non-designated heritage assets.

4.2.59 Where significant effects on heritage assets cannot be avoided through further detailed design development, additional mitigation is proposed. This would comprise archaeological excavation informed by archaeological field walking, archaeological geophysical survey and archaeological trial trenching in advance of construction. After additional mitigation, the residual significance of effect for these heritage assets has been assessed as non-significant.

4.2.60 Overall, no significant effects for archaeological remains, historic buildings and the historic landscape have been assessed and no significant cumulative effects have been assessed.

Policy 11(e)viii

4.2.61 Onshore EIA Report, Volume 1, Chapter 11: Water Quality and Flood Risk presents an assessment for the Proposed Development on water quality and flood risk receptors. The assessment concludes that with the implementation of Embedded Mitigation measures and proposed monitoring plans, the Proposed Development is not expected to result in any significant effects on water quality or flood risk, either alone or cumulatively with other projects.

Policy 11(e)ix

4.2.62 An assessment of the potential impacts and effects of the Proposed Development on onshore ecology and ornithology is presented in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology.

4.2.63 Overall it is concluded in this assessment that there will be no significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases by implementing embedded and specific mitigation measures for habitats and protected species. Embedded Mitigation measures to reduce potential impacts include:

- A Construction Environmental Management Plan (CEMP) including species-specific protection plans (including breeding birds);
- Pre-construction surveys and appointment of an Ecological Clerk of Works (ECoW); and
- Use of trenchless techniques to avoid sensitive areas.

Policy 11(e)x

4.2.64 Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access is supported by Technical Appendix 6.1: Forestry and Arboricultural Report

4.2.65 Trees and woodland are also considered in Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology.

4.2.66 The locations of woodland, mature and protected trees has been considered during the design process.

4.2.67 A section of the Onshore Cable corridor, the substation and the 400 kV cable are within Fetteresso Forest, a predominantly commercial coniferous woodland. As such construction of the Proposed Development will result in the temporary

and permanent loss of areas allocated for forestry. Details of compensatory woodland planting would be provided at the MSC stage and would be undertaken post construction to compensate for the loss of woodland as a result of construction of the Proposed Development to meet the Scottish Government's Policy on Control of Woodland Removal. A Woodland Management Plan would be developed at MSC stage.

Policy 11(e)xi

4.2.68 The Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development states at Section 2.13 of that chapter that:

'At the end of the operational lifetime, the Project will be decommissioned or repowered.

If decommissioning takes place, it is anticipated that all structures above ground will be completely removed. The decommissioning sequence will generally be the reverse of the construction sequence and involve similar types and numbers of vehicles and equipment.' (para 2.131 and 2.13.2)

4.2.69 Section 2.13 of the Onshore EIA Report Chapter 2 provides further information regarding decommissioning activities.

Policy 11(e)xii

4.2.70 Details regarding restoration requirements relating to decommissioning would be provided at that stage as required.

Policy 11(e)xiii

4.2.71 As described in the Onshore EIA Report, Volume 1, Chapter 3: Environmental Impact Assessment Methodology, a cumulative effects assessment (CEA) has been undertaken for the Proposed Development. A CEA is included in each of the environmental topic chapters of the Onshore EIA Report (Volume 1, Chapters 6-16).

**Conclusions on NPF4 Policy 11**

4.2.72 Policy 11(a) makes it clear that development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. This support includes grid transmission and distribution infrastructure.

4.2.73 Policy 11 states at the end of the part (e) assessment criteria that:

'In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.'

4.2.74 The above appraisal of the factors in Policy 11(e) demonstrate that the Proposed Development can be positively considered against these criteria.

**NPF4 Policy 1: Tackling the climate and nature crises**

4.2.75 The Intent of Policy 1 is 'to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis.'

4.2.76 Policy 1 states: 'When considering all development proposals significant weight will be given to the global climate and nature crises.'

***Appraisal - NPF4 Policy 1***

- 4.2.77 The wording of this policy and the need to give ‘significant weight’ to the global climate and nature crises is clear.
- 4.2.78 The Proposed Development which would provide the Bowdun Offshore Wind Farm with a means to connect to the onshore transmission network would contribute to meeting net zero obligations.
- 4.2.79 As noted in relation to NPF4 Policy 3 below, and stated in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology, habitat creation, restoration and enhancement areas will be developed at the MSC stage, which will take into account the detailed design for the Proposed Development and landscaping proposal. The aims and objectives of habitat creation, restoration and enhancement will be described in a detailed Habitat Management Plan (including biodiversity).
- 4.2.80 On this basis, strong support can be drawn from NPF4 Policy 1 for the Proposed Development.

***NPF4 Policy 2: Climate mitigation and adaptation***

- 4.2.81 The Intent of Policy 2 is ‘to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change’.
- 4.2.82 Policy 2 states: ‘a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.
- c) Development proposals to retrofit measures to existing development that reduce emissions or support adaptation to climate change will be supported.’

***Appraisal - NPF4 Policy 2***

- 4.2.83 The Onshore EIA Report, Volume 1, Chapter 15: Climate Change contains an assessment of the likely significant effects relating to climate change of the construction operation and maintenance, and decommissioning of the Proposed Development. The following aspects of climate change are included in the assessment:
- Emissions of greenhouse gas (GHGs) associated with the Proposed Development (i.e. the potential impact of the Proposed Development on the atmospheric concentrations of GHGs and their potential influence on global climate change); and
  - Climate change related impacts on the Proposed Development (i.e. the vulnerability of the Proposed Development to climate change, often referred to as climate change resilience).
- 4.2.84 The assessment of GHG emissions (referred to as the ‘Whole Life Carbon Assessment’ (WLCA)) was based on estimates of the GHG emissions across the full lifetime of the Proposed Development. As part of the Proposed Development design process, Embedded Mitigation has been proposed to reduce the potential for impacts on climate change. These consist of the

avoidance of areas of forestry where feasible, planting proposals, and sustainable waste management. Overall, estimated changes in GHG emissions as a result of the Proposed Development are relatively small in comparison to the UK and Scottish Government reduction targets towards meeting net zero, and so are considered to unlikely to have a material impact on the ability of either Government to meet the carbon budgets. Appropriate mitigation measures to reduce emissions as low as reasonably practicable are included in the Onshore EIA Report Chapter 15: Climate Change. This included the preparation and implementation of a Carbon Management Plan (CMP). The CMP would contain measures to reduce GHG emissions, switching to using lower carbon materials and improving the construction activities to be less carbon intensive. With the CMP in place the residual effect is assessed to be Minor Adverse, which is Not Significant in EIA terms. However, the consideration of the Proposed Development GHG emissions in isolation does not include for the GHG emissions for the Offshore Infrastructure. It also does not consider the beneficial impacts of the potentially avoided GHG emissions due to the Project providing renewable electricity in place of other more carbon-intensive forms of electricity generation using fossil fuels. This was assessed as part of the cumulative assessment in the Onshore EIA Report, Volume 1, Chapter 15: Climate Change and, based on the beneficial impacts of the avoided GHG emissions, it was concluded that the cumulative effect of the Project is assessed to be Beneficial, which is deemed to be Significant in EIA terms.

4.2.85 A Climate Change Risk Assessment (CCRA) has been undertaken to understand the risks from climate change to the Proposed Development and is reported in the Onshore EIA Report, Volume 1, Chapter 15: Climate Change. The main climate change hazards assessed included the projected increases in average and extreme temperatures, changes in rainfall patterns, including increased rainfall in winter months, flooding and increased frequency of flood events and extreme weather events including storms. Other potential hazards included increase in wind speed or occurrence of windstorms, however the climate projections for these are less pronounced and more uncertain than the temperature and rainfall climate change projections. A number of Embedded Mitigation measures have been incorporated or proposed to reduce the potential impacts of climate change on the Proposed Development. For example, the use of buried cables which are resilient to water damage, optimising substation design, and the optimising of the drainage design which includes allowance for climate change. The CCRA identified that with the embedded mitigation measures in place, the significance of climate change effects ranged from Negligible to Minor Adverse which was therefore considered to be Not Significant in EIA terms. No additional mitigation was required.

4.2.86 Overall the Proposed Development can be positively assessed against NPF4 Policy 2.

**NPF4 Policy 3: Biodiversity**

4.2.87 The Intent of Policy 3 is: ‘To protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.’

- 4.2.88 Policy 3 includes a range of criteria which depend on the type of development proposed.
- 4.2.89 Policy 3(a) applies to all development proposals and states that:  
‘Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.’
- 4.2.90 Policy 3(b) applies to development proposals for ‘national or major development, or for development that requires an Environmental Impact Assessment’. Policy 3(b) states further that proposals will ‘only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:’
- Policy 3b(i): the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;
  - Policy 3b(ii): wherever feasible, nature-based solutions have been integrated and made best use of;
  - Policy 3b(iii): an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
  - Policy 3b(iv): significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and
  - Policy 3b(v): local community benefits for the biodiversity and/or nature networks have been considered.
- 4.2.91 Policy 3(c) which relates to proposals for local development is not relevant to the Proposed Development.
- 4.2.92 Policy 3(d) states:  
‘Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.’
- 4.2.93 Prior to considering the policy further, a summary of the current guidance position relating to Policy 3 is provided.

### **Guidance Position**

- 4.2.94 It is noted that The Scottish Government’s Chief Planner letter issued on 8 February 2023 entitled ‘Transitional Arrangements for National Planning Framework 4’, includes commentary on Policy 3. The letter noted a commitment to developing guidance to accompany Policy 3. The letter includes the following: ‘recognising that currently there is no single accepted methodology for calculating and / or measuring biodiversity ‘enhancement’ – we have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. There will be some proposals which do not give rise to opportunities to contribute to the enhancement of biodiversity, and it will be for the decision maker to take into account the policies of NPF4 as a whole, together with material considerations in each case.’
- 4.2.95 The Scottish Government published ‘Draft Planning Guidance: Biodiversity’ in November 2023. It is noted in paragraph 1.1 of this document that: *‘This guidance sets out the Scottish Ministers’ expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome ‘improving biodiversity’.*
- 4.2.96 Under the heading of Key Terms, the guidance includes the following at paragraph 1.10:  
  
‘The terms ‘enhance’ and ‘enhancement’ are widely used in NPF4. In order for biodiversity to be ‘enhanced’ it will need to be demonstrated that it will be in an overall better state than before intervention, and this will be sustained in the future. Development proposals should clearly set out the type and scale of enhancement they will deliver.
- 4.2.97 The heading for Section 3 of the guidance is *‘Development proposals: Core principles’*. The guidance notes at paragraph 3.1 that:  
  
‘There are a number of commonly used and widely applied ‘principles’ which can be followed when designing development so that nature and nature recovery are an integral part of any proposal.
- 4.2.98 Section 3.1 of the guidance includes the following:  
  
‘Applying these principles will not only help to secure biodiversity enhancements, they can also help to deliver wider policy objectives including for green and blue infrastructure, open space, nature-based solutions, nature networks and 30x30... Development proposals which follow these steps are also much more likely to result in more pleasant and enriching places to live, work and spend time. The principles are:
- Apply the mitigation hierarchy
  - Consider biodiversity from the outset
  - Provide synergies and connectivity for nature
  - Integrate nature to deliver multiple benefits
  - Prioritise on-site enhancement before off-site delivery
  - Take a place-based and inclusive approach

- Ensure long term enhancement is secured
- Additionality'

4.2.99 The heading for Section 4 of the guidance is '*Determining planning applications*'. In relation to NPF4 Policy 3b the guidance includes the following:

- NPF4 does not specify or require a particular assessment approach or methodology to be used, though the policy makes clear best practice assessment methods should be used.
- Assessments may be qualitative or quantitative (for example through use of a metric).
- NatureScot will shortly commence work to develop an adapted biodiversity metric suitable for use in supporting delivery of NPF4 Policy 3b.

4.2.100 Section 4.12 of the guidance states:

'In the meantime, the absence of a universally adopted Scottish methodology/tool should not be used to frustrate or delay decision making, and a flexible approach will be required. Wherever relevant and applicable, and as indicated above, information and evidence gathered for statutory and other assessment obligations, such as EIA, can be utilised to demonstrate those ways in which the policy tests set out in NPF4 have been met. Equally, where a developer wishes to use an established metric or tool, the planning submission should demonstrate how Scotland's habitats and environmental conditions have been taken into account. Where an established metric or tool has been modified, the changes made and the reasons for this should be clearly set out.'

4.2.101 Section 4.14 of the guidance states:

'It will be for the Planning Authority to determine whether the relevant policy criteria have been met taking into account the circumstances of the particular proposal. NPF4 does not specify how much enhancement or 'net gain' should be delivered, though biodiversity should clearly be left in a 'demonstrably better state' than without intervention. Rather, the selection and design of enhancements will be a matter of judgement based on the circumstances of the individual case, taking into account a range of considerations including:

- The location of the development site and the opportunities it provides for enhancing biodiversity;
- The character and scale of the development;
- The requirements and cost of maintenance and future management measures proposed;
- The distinctiveness and scale of the biodiversity damaged or lost; and
- The time required to deliver biodiversity enhancements and any risks or uncertainty in achieving this.'

4.2.102 NatureScot has been commissioned by the Scottish Government to develop a biodiversity metric for Scotland's planning system to support delivery of NPF4 Policy 3b. NatureScot consulted on its paper '*A Biodiversity Metric for Scotland's*

*Planning System – Key Issues*’ in Spring 2024. The consultation ended on 10 May 2024.

4.2.103 A June 2025 update on NatureScot’s website noted that NatureScot had recently published ‘*Guidance on the use of existing biodiversity metrics in the Scottish planning system*’. The guidance states that ‘it provides:

- Good practice advice on use of metrics in advance of a Scottish Government commissioned Scottish biodiversity metric being available.
- An explanation of the key differences between the two main currently published metric tools: the English statutory biodiversity metric and the Scottish and Southern Energy Renewables (SSER) biodiversity project toolkit.’

4.2.104 The June 2025 update on NatureScot’s website notes that work is progressing on the development of the Scottish biodiversity metric and that NatureScot expect to be able to consult on a draft metric tool and guidance in 2026.

### **Appraisal - NPF4 Policy 3**

4.2.105 As stated in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology, habitat creation, restoration and enhancement areas will be developed at the MSC stage, which will take into account the detailed design for the Proposed Development and landscaping proposal. The aims and objectives of habitat creation, restoration and enhancement will be described in a detailed Biodiversity Enhancement Plan. It is likely that habitat creation, restoration and enhancement will be subject to routine monitoring by an ecology professional to evaluate the effectiveness of such measures against the aims and objectives described in the detailed Biodiversity Enhancement Plan.

4.2.106 The biodiversity assessment provided in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology is based on a thorough understanding of the existing characteristics of the site and its ecological context.

4.2.107 As referred to above in relation to NPF4 Policy 11 Energy, it is concluded in Onshore EIA Report Chapter 6: Biodiversity, Terrestrial Ecology and Ornithology that there will be no significant effects arising from the Proposed Development during the construction, operation, maintenance or decommissioning phases by implementing embedded and specific mitigation measures for habitats and protected species.

4.2.108 The Proposed Development is considered to accord with NPF4 Policy 3.

### **NPF4 Policy 4: Natural Places**

4.2.109 The Intent of Policy 4 is: ‘To protect, restore and enhance natural assets making best use of nature-based solutions.’

4.2.110 Policy 4(a) states that ‘development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment will not be supported.’

4.2.111 Policy 4(b) states:

‘Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an “appropriate assessment” of the implications for the conservation objectives.’

4.2.112 Policy 4(c) states:

‘Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

- i. The objectives of designation and the overall integrity of the areas will not be compromised; or
- ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

All Ramsar sites are also European sites and/or Sites of Special Scientific Interest and are extended protection under the relevant statutory regimes.’

4.2.113 Policy 4(d) deals with local nature conservation sites or landscape areas. Policy 4(d) states:

‘Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:

- i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or
- ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.

4.2.114 Policy 4(f) relates to protected species and includes the following:

‘...The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.’

#### ***Appraisal - NPF4 Policy 4***

4.2.115 As referred to above in relation to NPF4 Policy 11 Energy and Policy 3 Biodiversity, it is concluded in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology that there will be no significant effects arising from the Proposed Development during the construction, operation, maintenance or decommissioning phases by implementing embedded and specific mitigation measures for habitats and protected species.

4.2.116 Three European sites (Special Area of Conservation (SAC) or Special Protection Areas (SPA)) were identified within the Onshore Ecology Study Area: Garron Point SAC, Red Moss of Netherley SAC and the River Dee SAC. In addition, three European sites were recorded within the Onshore Ornithology Study Area: Montrose Basin SPA / Ramsar Site, Loch of Skene SPA / Ramsar Site, and Fowlsheugh SPA. The Proposed Development is not connected with, or

necessary to the management of these European Sites and therefore subject to a Habitats Regulations Appraisal (HRA) to establish if the Proposed Development could have a likely significant effect (LSE) on a European Site. An HRA Screening assessment is undertaken in the Onshore EIA Report Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology which concludes that as no Likely Significant Effects (LSE) are predicted to arise from the Proposed Development either singularly or in-combination with other plans or projects, no further HRA-related assessment is required.

4.2.117 The landscape and visual assessment study area in Onshore EIA Report, Volume 1, Chapter 8: Landscape and Visual Impact Assessment does not fall within any national landscape designations.

4.2.118 Onshore EIA Report, Volume 1, Chapter 8: Landscape and Visual Impact Assessment contains an assessment of impacts and their significance upon the integrity and special qualities of the Southeast Aberdeenshire Coast Special Landscape Area (SLA) (Table 8.18: Assessment of Landscape Designations). This SLA is a local landscape designation which covers the southern extents of the landscape and visual assessment study area and comprises a narrow strip running along the Aberdeenshire Coastline from Portlethan to Montrose Bay. The PPP Application Boundary falls within this designation. In relation to the magnitude of change during the construction phase, the assessment states that changes will be across a relatively small area of the SLA and will not alter any of the defining Special Qualities of the SLA. The objectives of designation and the overall integrity of the SLA will not be compromised. The overall magnitude of change to the SLA during the construction phase would be Low and the significance of effect during the construction phase is assessed being Minor and Not Significant in EIA terms. The assessment of landscape impact during the operation and maintenance phase for the SLA notes that the landscape assessment of the Landfall area and Cable Corridors during the operation and maintenance phase has been scoped out. No visibility of the Substation will be experienced from the SLA so no impact is predicted.

4.2.119 An assessment of the Proposed Development in relation to local nature conservation sites is contained in Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology. As stated earlier in this section this EIA Report chapter concludes that there will be no significant effects arising from the Proposed Development during the construction, operation, maintenance or decommissioning phases by implementing embedded and specific mitigation measures for habitats and protected species.

4.2.120 It is considered that the Proposed Development can be positively assessed against Policy NPF4 Policy 4.

**NPF4 Policy 5: Soils**

4.2.121 The Intent of Policy 5 is ‘to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.’

4.2.122 Policy 5(a) states:

‘Development proposals will only be supported if they are designed and constructed:

- i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and
- ii. In a manner that protects soil from damage including from compaction and erosion.’

4.2.123 Policy 5(b) states:

‘Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified in the LDP, will only be supported where it is for:

- iii. Essential infrastructure and there is a specific locational need and no other suitable site;
- iv. Small-scale development directly linked to a rural business, farm or croft or for essential workers for the rural business to be able to live onsite;
- v. The development of production and processing facilities associated with the land produce where no other local site is suitable;
- vi. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration; and

In all of the above exceptions, the layout and design of the proposal minimises the amount of protected land that is required.

4.2.124 Policy 5(c) states:

‘Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for:

- i. Essential infrastructure and there is a specific locational need and no other suitable site;
- ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas reduction targets;
- iii. Small-scale development directly linked to a rural business, farm or croft;
- iv. Supporting a fragile community in a rural or island area; or
- v. Restoration of peatland habitats.

4.2.125 Policy 5(d) states:

‘Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify:

- i. the baseline depth, habitat condition, quality and stability of carbon rich soils;
- ii. the likely effects of the development on peatland, including on soil disturbance; and
- iii. the likely net effects of the development on climate emissions and loss of carbon’

This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse

impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.’

**Appraisal - NPF4 Policy 5**

- 4.2.126 Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions assesses the likely significant effects of the Proposed Development on Geology and Ground Conditions. This chapter includes an assessment of effects on soils and peatland. The Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access includes an assessment of impacts on Land Capability for Agriculture (LCA) (Soils).
- 4.2.127 The Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access sets out that reducing impacts on prime agricultural land has been proposed as an Embedded Mitigation measure. The location and geographic extent of the PPP Application Boundary has been designed to reduce the permanent loss of Prime Agricultural Land (LCA Grades 1, 2 and 3.1). The construction of the Proposed Development would affect agricultural land with land classification for agricultural grades as detailed in the Onshore EIA Report. Volume 1, Chapter 6, Table 6.19: Land Capability for Agriculture directly affected by the Proposed Development. This table shows that there would be temporary impacts of the 220/275kV Onshore Export Cable Corridor of 37.78 ha on prime agricultural land and no permanent impacts on prime agricultural land.
- 4.2.128 The Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions concludes that there are no significant effects in EIA terms on soils.
- 4.2.129 Figure 10.5 of Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions shows the Carbon and Peatland 2016 Map classifications.
- 4.2.130 Site specific peat surveys were not proposed within the Onshore Export Cable Corridor due to the avoidance of mapped peat areas during the design of the Proposed Development. Peat was recorded in a limited number of exploratory holes near the Substation Search Area during ground investigation with a thicknesses of less than 0.5 m.
- 4.2.131 Potential loss of peat in the PPP Application Boundary results in a negligible to minor adverse effect, which is not significant in EIA terms.
- 4.2.132 The Proposed Development is considered to accord with Policy 5.

**NPF4 Policy 6: Forestry, woodland and trees**

- 4.2.133 The Policy Intent is ‘to protect and expand forests, woodland and trees.’
- 4.2.134 Policy 6(a) states that ‘Development proposals that enhance, expand, and improve woodland and tree cover will be supported.’
- 4.2.135 Policy 6(b) states that:  
‘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 if 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?

4.2.136 Policy 6(c) states:

‘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.’

4.2.137 Policy 6(d) states:

‘Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy 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.’

#### **Appraisal - NPF4 Policy 6**

4.2.138 NPF4 Policy 11(e)x which relates to impacts on trees, woods and forests is considered at the relevant section above. It is considered that the Proposed Development accords with NPF4 Policy 6.

#### **NPF4 Policy 7: Historic assets and places**

4.2.139 The Intent of Policy 7 is ‘to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places’.

4.2.140 Relevant elements of the policy include the following:

- Part (a) seeks that development proposals with a potentially significant impact on historic assets or places will be accompanied by a cultural heritage assessment and provides requirements for the assessment.
- Part (c) states: ‘Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.’
- Part (d) states: ‘Development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced.’

- Part (h) states ‘Development proposals affecting scheduled monuments will only be supported where:
  - i. direct impacts on the scheduled monument are avoided;
  - ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or
  - iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.’
- Part (i) states ‘Development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve, or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.’
- Part (o) states: ‘Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment. Where impacts cannot be avoided they should be minimised. Where it has been demonstrated that avoidance or retention is not possible, excavation, recording, analysis, archiving, publication, and activities to provide public benefit may be required through the use of conditions or legal/planning obligations. When new archaeological discoveries are made during the course of development works, they must be reported to the planning authority to enable agreement on appropriate inspection, recording and mitigation measures.’

#### **Appraisal - NPF 4 Policy 7**

4.2.141 Impacts on the historic environment have been considered in the discussion regarding NPF4 Policy 11(e)vii at the relevant section above. The Onshore EIA Report, Volume 1, Chapter 9: Cultural Heritage addresses these matters in detail where relevant to the Proposed Development and no significant effects have been identified. The Proposed Development is considered to accord with Policy 7.

#### **NPF4 Policy 10: Coastal development**

4.2.142 The Intent of Policy 10 is ‘to protect coastal communities and assets and support resilience to the impacts of climate change.’

4.2.143 Part (b) of Policy applies to development proposals in undeveloped coastal areas and states that such proposals ‘*will only be supported where they:*

- i. are necessary to support the blue economy, net zero emissions or to contribute to the economy or wellbeing of communities whose livelihood

- depend on marine or coastal activities, or it 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.'

**Appraisal - NPF4 Policy 10**

- 4.2.144 The Proposed Development would provide the Bowdun Offshore Wind Farm with a means to connect to the onshore transmission network would contribute towards meeting net zero obligations.
- 4.2.145 The Onshore EIA Report Volume 1, Chapter 15: Climate Change contain a CCRA which has been undertaken to understand the risks from climate change to the Proposed Development. These risks were factored into the design were practicable at this stage, supporting adaption to future risks from climate change. Onshore EIA Report, Volume 1, Chapter 11: Water Quality and Flood Risk presents an assessment for the Proposed Development on water quality and flood risk receptors. The assessment concludes that with the implementation of Embedded Mitigation measures and proposed monitoring plans, the Proposed Development is not expected to result in any significant effects on water quality or flood risk, either alone or cumulatively with other projects. The Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development outlines that the Offshore Export Cables will be brought under the intertidal area using a trenchless technique which will be confirmed at detailed design when pipe material, installation distance and alignment requirements have been determined. The construction method proposed for the installation of the Offshore Export Cables will likely be via direct or pre-installed ducts below ground with minimal disturbance; using trenchless techniques such as HDD or Pipe Jacking (PJ)/Direct Pipe methods. The Proposed Development is not anticipated to increase the risk of coastal erosion. The Proposed Development is considered to accord with Policy 10.

**NPF4 Policy 14: Design, Quality and Place**

- 4.2.146 The Intent of Policy 14 is to 'encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle'.
- 4.2.147 The Place Principle is defined in NPF4 Annex F 'Glossary of Definitions' as:  
'All those responsible for providing services and looking after assets in a place need to work and plan together, and with local communities, to improve the lives of people, support inclusive and sustainable economic growth and create more successful places.'

- 4.2.148 Policy 14(a) states that ‘Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.’
- 4.2.149 Policy 14(b) states that development proposals will be supported where they are consistent with the six qualities of successful places (healthy, pleasant, connected, distinctive, sustainable, and adaptable) and provides more detail about these qualities.
- 4.2.150 Policy 14(c) states that ‘development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.’

#### **Appraisal - NPF4 Policy 14**

- 4.2.151 The PPP Application for the Proposed Development is supported by a Design and Access Statement which contains an appraisal of the Proposed Development against Policy 14. The Proposed Development is considered to comply with Policy 14.

#### **NPF4 Policy 20: Blue and Green Infrastructure**

- 4.2.152 The Intent of Policy 20 is to ‘protect and enhance blue and green infrastructure and their networks.’
- 4.2.153 Blue infrastructure is defined in NPF4 Annex F ‘Glossary of Definitions’ as: ‘Water environment features within the natural and built environments that provide a range of ecosystem services. Blue features include rivers, lochs, wetlands, canals, other water courses, ponds, coastal and marine areas including beaches, porous paving, sustainable urban drainage systems and raingardens.’
- 4.2.154 Green infrastructure is defined in NPF4 Annex F ‘Glossary of Definitions’ as ‘Features or spaces within the natural or built environments that provide range of ecosystem services.’
- 4.2.155 Policy 20(a) states: ‘Development proposals that result in fragmentation or net loss of existing blue and green infrastructure will only be supported where it can be demonstrated that 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. The planning authority’s Open Space Strategy should inform this.’
- 4.2.156 Policy 20(b) states:  
‘Development proposals for or incorporation new or enhanced blue and/or green infrastructure will be supported. Where appropriate, this will be an integral element of the design and responds to local circumstances.  
  
Design will take into account of existing provision, new requirements and network connections (identified in strategies such as Open Space Strategies) to ensure the proposed blue and/or green infrastructure is of an appropriate type(s), quantity, quality and accessibility and is designed to be multi-functional and well integrated into the overall proposals.’

4.2.157 Policy 20(e) states: ‘Development proposals that include new or enhanced blue and/or green infrastructure will provide effective management and maintenance plans covering the funding arrangements for their long-term delivery and upkeep, and the party or parties responsible for these.’

**Appraisal - NPF4 Policy 20**

4.2.158 As stated in the section on the appraisal of the Proposed Development against NPF4 Policy 3: Biodiversity above, the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology, sets out that habitat creation, restoration and enhancement areas will be developed at the MSC stage, which will take into account the detailed design for the Proposed Development and landscaping proposal. The aims and objectives of habitat creation, restoration and enhancement will be described in a detailed Biodiversity Enhancement Plan. It is likely that habitat creation, restoration and enhancement will be subject to routine monitoring by an ecology professional to evaluate the effectiveness of such measures against the aims and objectives described in the detailed Biodiversity Enhancement Plan.

4.2.159 It is concluded in the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology that there will be no significant effects arising from the Proposed Development during the construction, operation, maintenance or decommissioning phases by implementing embedded and specific mitigation measures for habitats and protected species.

4.2.160 Onshore EIA Report, Volume 1, Chapter 11: Water Quality and Flood Risk presents an assessment of the Proposed Development on water quality and flood risk receptors. The assessment concludes that with the implementation of embedded mitigation measures and proposed monitoring plans, the Proposed Development is not expected to result in any significant effects on water quality or flood risk, either alone or cumulatively with other projects. Mitigation measures include:

- Implementation of sustainable urban drainage systems and measures to intercept and attenuate surface water drainage and that surface water discharges are controlled in quality and volume;
- Appropriately designed watercourse diversions and watercourse crossings in line with guidance to ensure flows are adequately maintained; and
- Proposed monitoring of surface water quality and private water supplies.

4.2.161 Overall it is concluded that the Proposed Development accords with Policy 20.

**NPF4 Policy 22: Flood risk and water management**

4.2.162 The Intent of Policy 22 is to ‘strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.’

4.2.163 The most relevant part of the policy is referred to below.

4.2.164 Policy 22(c) states that ‘development proposals will:

- i.* not increase the risk of surface water flooding to others, or itself be at risk.
- ii.* manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue-infrastructure. All proposals should presume no surface water connection to the combined sewer;
- iii.* seek to minimise the area of impermeable surface.'

***NPF4 Policy 22 - Appraisal***

4.2.165 Effects on hydrology, the water and environment and flood risk are an assessment criteria under NPF4 Policy 11 which is considered under the relevant heading above. Onshore EIA Report, Volume 1, Chapter 11: Water Quality and Flood Risk presents an assessment of the Proposed Development on water quality and flood risk receptors. The assessment concludes that with the implementation of Embedded Mitigation measures and proposed monitoring plans, the Proposed Development is not expected to result in any significant effects on water quality or flood risk, either alone or cumulatively with other projects. The Proposed Development is considered to comply with Policy 22.

***NPF4 Policy 23: Health and safety***

- 4.2.166 The Intent of Policy 23 is 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.'
- 4.2.167 Relevant parts of the policy are referred to below.
- 4.2.168 Part (d) includes the statement that development proposals 'that are likely to have significant adverse effects on air quality will not be supported...'
- 4.2.169 Part (e) includes the statement that development proposals 'that are likely to raise unacceptable noise issues will not be supported...'
- 4.2.170 Part (g) states 'development proposals within the vicinity of a major accident hazard site or major accident hazard pipeline (because of the presence of toxic, highly reactive, explosive or inflammable substances) will consider the associated risks and potential impacts of the proposal and the major accident hazard site/pipeline of being located in proximity to one another.'

***NPF4 Policy 23 – Appraisal***

- 4.2.171 In terms of air quality, the Onshore EIA Report, Volume 1, Chapter 12: Air Quality presents an assessment of likely significant effects of the Proposed Development on air quality receptors. This assessment does not identify any likely significant residual effects on air quality.
- 4.2.172 In terms of noise, Onshore EIA Report, Volume 1, Chapter 13: Noise and Vibration presents a noise and vibration assessment which assesses the likely significant effects arising from the Proposed Development. This assessment concludes that no likely significant effects are predicted.
- 4.2.173 The Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development provides information in relation to pipeline crossing considerations. The

Proposed Development is in an area with significant existing infrastructure including a number of high pressure gas, fuel and oil pipelines. Early desk based assessments were undertaken to identify and owners and operators of these infrastructure assets, including INEOS, Shell and National Gas Transmission. Details of this consultation can be found in the Onshore EIA Report, Volume 1, Chapter 4: Stakeholder Engagement and Consultation. The construction methods in the vicinity of these assets will comply with regulations and deploy best practice measures such that risks of accidents are well within acceptable parameters. Details of crossing locations and designs will be confirmed during the MSC stage, following consultation and agreement with the appropriate stakeholders.

4.2.174 The Proposed Development is considered to accord with Policy 23.

**NPF4 Policy 25: Community wealth building**

4.2.175 The Intent of Policy 25 is to ‘encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a well-being economy at local, regional and national levels.’

4.2.176 Policy 25(a) states:

‘Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.’

**NPF4 Policy 25 – Appraisal**

4.2.177 The Onshore EIA Report, Volume 1, Chapter 4: Stakeholder Engagement and Consultation sets out the approach to the stakeholder engagement and consultation process undertaken during the pre-application stage. This includes a summary of the wider supply chain and industry engagement undertaken by TWP as the developer of the Project. The Applicant is committed to engaging with the local supply chain at the appropriate stages of the Proposed Development’s progression, creating conditions for Scottish and UK companies to support delivery of the Project and other Scotwind developments.

4.2.178 As referred to in the appraisal of NPF4 Policy 11(c), an assessment of socio-economic effects has been undertaken as part of the EIA and is presented in the Onshore EIA Report Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation. Investment in the Project is expected to create jobs, stimulate local industries, and boost economic activity in manufacturing, engineering and infrastructure.

4.2.179 The Onshore EIA Report, Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation provides information on the Applicant’s approach to supply chain development, skills and workforce development, STEM initiatives, and community empowerment.

4.2.180 It is considered that the Proposed Development can draw support from Policy 25.

#### **Conclusions on NPF4**

4.2.181 The Proposed Development is classified as National Development under the provisions of National Planning Framework 4 (NPF4). Annex B of NPF4 – National Developments Statement of Need, 3. ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’ includes the classification: ‘*New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.*’

4.2.182 NPF4 Policy 11 contains a presumption that all renewable energy development (including enabling works such as grid transmission and distribution infrastructure) will be supported. As such the Proposed Development can draw in-principle support from Policy 11. The appraisal of the factors in Policy 11 demonstrate that the Proposed Development can be positively considered against these criteria.

4.2.183 NPF4 Policy 1 makes clear the need to give ‘significant weight’ to the global climate and nature crises when considering all development proposals. Strong support can be drawn from NPF4 Policy 1 for the Proposed Development.

4.2.184 The appraisal of NPF4 policy contained in Section 4.2 of this Planning Statement demonstrates that the Proposed Development would accord with NPF4.

### **4.3 Aberdeenshire Local Development Plan 2023**

4.3.1 The Aberdeenshire Local Development Plan (LDP), adopted in January 2023, is the other element of the statutory Development Plan covering the PPP Application boundary.

4.3.2 As noted previously, the Town and Country Planning (Scotland) Act 1997 (as amended) requires that in the event of any incompatibility between a provision of NPF4 and a Local Development Plan provision the later in date will prevail.

4.3.3 In relation to the Proposed Development therefore, in the event of any incompatibility between NPF4 and the Aberdeenshire LDP, NPF4 would take precedence.

4.3.4 This section of the Planning Statement summarises the sections of Aberdeenshire LDP policies considered to be of most relevance to the Proposed Development. To avoid duplication, where Aberdeenshire LDP policies raise matters already considered in relation to NPF4, cross reference is made to the earlier appraisal of NPF4 policies.

4.3.5 Aberdeenshire LDP policies of most relevance to the Proposed Development are listed below. The appraisal of the Proposed Development against these policies is provided in the following sections.

- Aberdeenshire LDP Policy R1 Special Rural Areas.
- Aberdeenshire LDP Policy P1 Layout, Siting and Design
- Aberdeenshire LDP Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land

- Aberdeenshire LDP Policy E1 Natural Heritage
- Aberdeenshire LDP Policy E2 Landscape
- Aberdeenshire LDP Policy E3 Forestry and Woodland
- Aberdeenshire LDP Policy HE1 Protected Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)
- Aberdeenshire LDP Policy HE2 Protecting Historic, Cultural and Conservation Areas
- Aberdeenshire LDP Policy PR1 Protecting Important Resources
- Aberdeenshire LDP Policy C2 Renewable Energy
- Aberdeenshire LDP Policy C3 Carbon Sinks and Stores
- Aberdeenshire LDP Policy C4 Flooding
- Aberdeenshire LDP Policy RD1 Providing Suitable Services

#### **Aberdeenshire LDP Policy R1 Special Rural Areas**

4.3.6 The eastern part of the site, to the east of the A92, lies within the extent of the coastal zone shown on Map 31 of Aberdeenshire LDP Appendix 5. Aberdeenshire LDP Policy R1 therefore applies.

4.3.7 Paragraph R1.3 states:

‘In the coastal zone development must require a coastal location or there must be clear social, economic, environmental or community benefits arising. In either case there must be no coalescence of coastal developments or adverse impacts on natural coastal processes or habitats.’

#### **Appraisal - Aberdeenshire LDP Policy R1**

4.3.8 There is a requirement for the Proposed Development to involve a coastal location with onshore infrastructure including underground cables required through the coastal zone to connect the offshore wind farm to the transmission grid. The Proposed Development will not result in coalescence of coastal development. The Proposed Development is considered to accord with Aberdeenshire LDP Policy R1.

#### **Aberdeenshire LDP Policy P1 Layout, Siting and Design**

4.3.9 Paragraph P1.4 notes that proposals for national or major development should meet appropriate levels of public and stakeholder engagement.

4.3.10 Paragraph P1.5 outlines that Aberdeenshire Council will only approve development designs that demonstrate the following six qualities of successful places: distinctive; safe and pleasant; welcoming; adaptable; efficient; and well connected.

4.3.11 Paragraph P1.7 states that: ‘measures require to be identified to enhance biodiversity in proportion to the opportunities available and the scale of the development opportunity. In very rare circumstances, when it is not practical to meet biodiversity net gain within a development site, we may require off-site contributions towards biodiversity enhancement within the settlement or near to the site. These obligations can be controlled by conditions.’

4.3.12 Paragraph P1.8 refers to the requirement to submit a site waste management plan to demonstrate that developers have minimised the generation of waste

and maximised reuse and recycling during the construction and operation phases of new development and notes that obligations can be controlled by conditions.

***Appraisal – Aberdeenshire LDP Policy P1***

4.3.13 The Pre-Application Consultation Report submitted with the PPP application provides information to demonstrate that TWP have met, for and on behalf of the Applicant, the statutory pre-application consultation requirements and documents the comprehensive approach to pre-application consultation. The PAC Report has followed the principles of Aberdeenshire Council’s Planning Advice PA2023-15: SP=EED (Successful Planning = Effective Engagement and Delivery)(September 2023).

4.3.14 As noted in the appraisal of NPF4 Policy 14 ‘Design, quality and place’, the PPP Application for the Proposed Development is supported by a Design and Access Statement which describes the site selection and design process undertaken for the Proposed Development.

4.3.15 As noted in relation to NPF4 Policy 1 and 3, the Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology states that habitat creation, restoration and enhancement areas will be developed at the MSC stage, which will take into account the detailed design for the Proposed Development and landscaping proposal. The aims and objectives of habitat creation, restoration and enhancement will be described in a detailed Habitat Management Plan (including biodiversity).

4.3.16 The Onshore EIA Report, Volume 1, Chapter 2: The Proposed Development sets out that procedures for handling waste materials will be set out in a Site Waste Management Plan (SWMP). A SWMP will be prepared at MSC stage and will form an appendix to the detailed Construction Environmental Management Plan (CEMP). The Onshore EIA Report includes an Outline CEMP (Volume 2, Technical Appendix 2.2: Outline CEMP) which includes commitment to a SWMP. The SWMP will be produced at the MSC stage once detailed design is known and will contain good practice measures and procedures to manage all waste produced from the Proposed Development.

4.3.17 It is considered that the Proposed Development accords with Policy P1.

***Aberdeenshire LDP Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land***

4.3.18 Paragraph P4.1 outlines that development will be refused if there is a risk that it could cause significant pollution, create a significant nuisance (for example through impacts on air quality or noise), or present an unacceptable danger to the public or the environment. In any circumstances where development of this kind is, on balance, considered acceptable, by the appropriate authorities, satisfactory steps must be taken to mitigation any residual negative development impacts.

4.3.19 Paragraph P4.2 sets out that when determining planning applications for development within the consultation zones for hazardous installations (including oil and gas pipelines), Aberdeenshire Council will consult with, and

take full account of advice from the Health and Safety Executive (HSE), the Competent Authority (in the case of Control of Major Accident and Hazardous sites) and the facility's owners and operators and will seek to ensure that any risk to public safety is not increased.

- 4.3.20 Paragraph P4.3 states that planning permission may be refused for potentially hazardous developments, or for other forms of development in close proximity to existing hazardous developments, in the event that insufficient information has been submitted to demonstrate the impacts or where the impacts are unclear or unknown.
- 4.3.21 Paragraph P4.4 outlines that Aberdeenshire Council will not allow development on land that is known or suspected to be contaminated unless appropriate site investigations have been undertaken to identify any actual or possible risk to public health or the environment (including possible pollution of the water environment), and effective remedial actions are proposed to ensure the site is made suitable for its new use. Where site conditions are appropriate, consideration should be given to both radioactive and non-radioactive sources of contamination.
- 4.3.22 Paragraph P4.5 outlines that 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.

***Appraisal – Aberdeenshire LDP Policy P4***

- 4.3.23 The relevant provisions of this policy are considered in the appraisal of NPF4 Policy 23 Health and Safety and NPF4 Policy 11 Energy.
- 4.3.24 In terms of air quality, the Onshore EIA Report, Volume 1, Chapter 12: Air Quality presents an assessment of likely significant effects of the Proposed Development on air quality receptors. This assessment does not identify any likely significant residual effects on air quality.
- 4.3.25 In terms of noise, Onshore EIA Report, Volume 1, Chapter 13: Noise and Vibration presents a noise and vibration assessment which assesses the likely significant effects arising from the Proposed Development. This assessment concludes that no likely significant effects are predicted.
- 4.3.26 Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions reports that potential contamination sources are limited to areas associated with railway land, quarries and two landfill sites. Further investigation of potential sources of contamination will be required, in accordance with Land Contamination Risk Management (LCRM), and land made suitable for use prior to construction. Potential significant effects to human health, groundwater and surface waters from contamination were therefore assessed as negligible to minor adverse, which is not significant in EIA terms. Significant effects from land contamination are not anticipated during the operational and/or decommissioning phases because land will have been made suitable for use prior to construction under LCRM.
- 4.3.27 It is considered that the Proposed Development accords with Policy P4.

### **Aberdeenshire LDP Policy E1 Natural Heritage**

- 4.3.28 Paragraph E1.1 states that Aberdeenshire Council will ‘not allow new development where it may have an unacceptable adverse effect on a nature conservation site designated for its biodiversity, species, habitat, or geodiversity importance’ except where specific circumstances apply.
- 4.3.29 Paragraph E1.2 outlines that in the case of sites designated for nature conservation interests at a European level, if it cannot be ascertained that the development would not adversely affect the integrity of the site, development will only be permitted where: there are no alternative solutions; there are imperative reasons of overriding public interest, and compensatory measures have been identified and agreed.
- 4.3.30 Paragraph E1.3 outlines that development that affects national sites will only be permitted where a thorough assessment demonstrates that the objectives of designation and the overall integrity of the site will not be compromised, or any significant adverse affects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. In all cases any impacts should be minimised through careful design and mitigation measures.
- 4.3.31 Paragraph E1.4 outlines that for nature conservation sites designated at a local level, the proposal’s public benefits must clearly outweigh the nature conservation value of the site and that in all cases impacts must be minimised through careful design and mitigation measures.
- 4.3.32 Paragraph E1.6 outlines that development must seek to avoid any unacceptable detrimental impact on protected species.
- 4.3.33 Paragraph E1.7 outlines that a baseline ecological or geological survey must be prepared for all developments and other proposals where there is evidence to suggest that a habitat, geological feature or species of importance may exist on or adjacent to the site.
- 4.3.34 Paragraph E1.8 outlines that Aberdeenshire Council will only approve development proposals:
- when a baseline ecological survey has been carried out;
  - when the development has been designed to avoid impacts where possible;
  - where impacts cannot be avoided the public benefits clearly outweigh the ecological or geological value of the site; and
  - where an ecological or geological management plan is provided that includes necessary mitigation and compensation measures to result in ecological net gain.

### **Appraisal - Aberdeenshire LDP Policy E1**

- 4.3.35 NPF4 Policy 3 Biodiversity includes the conservation, restoration and enhancement of biodiversity within its scope and NPF4 Policy 4 Natural Places relates to the protection, restoration and enhancement of natural assets including natural heritage assets. It is considered that the appraisal of the relevant NPF4 policies contained in Section 4.2 of this Planning Statement

demonstrates that the Proposed Development complies with Aberdeenshire LDP Policy E1.

#### **Aberdeenshire LDP Policy E2 Landscape**

4.3.36 Paragraph E2.1 states that Aberdeenshire Council will:

‘refuse 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 as defined in the Landscape Character Assessments produced by NatureScot. These impacts can be either alone or cumulatively with other recent developments. A Landscape and Visual Impact Assessment (LVIA) may be required to assess the effects of change on a landscape that could be experienced should a development proposals be approved. Appropriate mitigation should be identified.’

4.3.37 Paragraph E2.2 outlines that development that has a significant adverse impact on the qualifying interests of a Special Landscape Area will not be permitted unless it is adequately demonstrated that these effects are clearly outweighed by social, environmental or economic benefits of at least local importance.

#### **Appraisal – Aberdeenshire LDP Policy E2**

4.3.38 NPF4 Policy 11(e)ii provides that project design and mitigation will demonstrate how landscape and visual impacts are addressed and NPF4 Policy 4 relates to the protection, restoration and enhancement of natural assets including landscape designations. It is considered that the appraisal of NPF4 Policy 11(e)ii and NPF4 Policy 4 in Section 4.2 of this Planning Statement demonstrates compliance with Aberdeenshire LDP Policy E2.

#### **Aberdeenshire LDP Policy E3 Forestry and Woodland**

4.3.39 Paragraph E3.1 outlines that forests and native and semi-natural woodland areas must be protected and, where appropriate, enhanced to safeguard the environment, habitats, species and local culture, whilst benefitting the local and national economy.

4.3.40 Paragraph E3.2 contains a presumption against the removal of safe and healthy trees, non-commercial woodlands and hedgerows. Criteria in the Scottish Government’s policy on Control of Woodland Removal will be used to determine the acceptability of woodland removal.

#### **Appraisal – Aberdeenshire LDP Policy E3**

4.3.41 NPF4 Policy 11(e)x provides that project design and mitigation will demonstrate how impacts on trees, woods and forests are addressed and NPF4 Policy 6 deals with forestry, woodland and trees. As stated in Section 4.2 of this Planning Statement, the Onshore EIA Report, Volume 1, Chapter 6: Land Use, Agriculture and Public Access is supported by Volume 2, Technical Appendix 6.1: Forestry and Arboricultural Report. Trees and woodland are also considered in Onshore EIA Report, Volume 1, Chapter 7: Biodiversity, Terrestrial Ecology and Ornithology. The locations of woodland, mature and protected trees has been considered during the design process. In addition, the Onshore EIA Report, Volume 1, Chapter 5: Site Selection and Reasonable Alternatives Considered, provides a full description of the site selection and reasonable alternatives considered.

Chapter 5: Site Selection and Reasonable Alternatives Considered outlines that initial site visits identified that potential substation sites outwith Fetteresso Forest were disadvantaged by landscape and topography constraints and were therefore considered unsuitable due to the likelihood of significant landscape and visual effects. The requirement for the substation site to be in proximity to the GCP is also referred to as a consideration. In addition, the selection of the substation location considered the limitation of impacts on forestry. At the preferred substation site the coup were it was located had experienced significant windthrow on the southern half and was considered to have failed, meaning felling would be required regardless. A section of the Onshore Cable corridor, the substation and the 400 kV cable are within Fetteresso Forest, a predominantly commercial coniferous woodland. As such construction of the Proposed Development will result in the temporary and permanent loss of areas allocated for forestry. Details of compensatory woodland planting would be provided at the MSC stage and would be undertaken post construction to compensate for the loss of woodland as a result of construction of the Proposed Development to meet the Scottish Government's Policy on Control of Woodland Removal. A Woodland Management Plan would be developed at MSC stage. It is noted that Aberdeenshire LDP Policy E3 contains a presumption against the removal of safe and healthy trees, non commercial woodland and hedgerows. NPF4 Policy 6 outlines that development proposals which involve woodland removal will be supported where they 'will achieve significant and clearly defined additional public benefits.' In this respect, as NPF4 is the was published after the Aberdeenshire LDP, the provisions of NPF4 Policy 6 prevail.

**Aberdeenshire LDP Policy HE1 Protected Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)**

- 4.3.42 Paragraph HE1.1 states that Aberdeenshire Council will:
- 'resist development that would have an adverse impact on the character, integrity or setting of listed buildings, or scheduled monuments, or other archaeological sites. If adverse impact is unavoidable, it should be minimised and justified.'
- 4.3.43 Paragraph HE1.5 outlines that 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. Proposals for development should provide information on the nature and location of the archaeological features, including details of any mitigation measures proposed.

**Appraisal – Aberdeenshire LDP Policy HE1**

- 4.3.44 NPF4 Policy 11(e)vii provides that project design and mitigation will demonstrate how impacts on historic environment are addressed and NPF4 Policy 7 seeks to protect and enhance historic environment assets and places.
- 4.3.45 It is considered that the appraisal of NPF4 Policy 11(e)vii and NPF4 Policy 7 in Section 4.2 of this Planning Statement demonstrates compliance with Aberdeenshire LDP Policy HE1.

**Aberdeenshire LDP Policy HE2 Protecting Historic, Cultural and Conservation Areas**

- 4.3.46 Paragraph HE2.1 outlines that Aberdeenshire Council will resist development which would fail to preserve or enhance the character or appearance of a conservation area.
- 4.3.47 Paragraph HE2.3 outlines that development affecting an inventory battlefield or inventory garden and designed landscape will only be permitted if:
- the proposal would not have an adverse impact that compromises the objectives of the designation of an inventory garden or designed landscape, or the key landscape characteristics and special qualities of an inventory battlefield; or
  - any significant adverse effects are outweighed by long-term social or economic benefits of overriding public importance and there is no alternative site for the development.

**Appraisal – Aberdeenshire LDP Policy HE2**

- 4.3.48 The Onshore EIA Report, Volume 1, Chapter 9: Cultural Heritage addresses these matters in detail where relevant to the Proposed Development and no significant effects have been identified. The Proposed Development is considered to accord with Policy HE2.

**Aberdeenshire LDP Policy PR1 Protecting Important Resources**

- 4.3.49 Paragraph PR1.1 outlines that Aberdeenshire Council will not approve 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. Development which impacts any of these features 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.
- 4.3.50 Paragraph PR1.2 outlines that new developments should not have a significant adverse impact on air quality.
- 4.3.51 Paragraph PR1.3 outlines that new development which will generate discharges or other impacts on water bodies (including wetlands), or which could affect the water quality, quantity, flow rate, botanical richness, ecological status, riparian habitat, protected species or flood plains of water bodies (including their catchment area) must not prejudice water quality or flow rates, or their ability to achieve or maintain good ecological status. Paragraph PR1.3 provides that opportunities for the improvement of water quality, physical enhancement of waterbodies for the creation, enhancement and management of habitats shall be required where feasible to contribute to the improvement of the overall status of the water body.
- 4.3.52 Paragraph PR1.4 outlines that if Ground Water Dependent Terrestrial Ecosystems (GWDTE) are present then they should be avoided or further assessment and appropriate mitigation will be required.

- 4.3.53 Paragraph PR1.5 outlines that prime agricultural land (defined as classes 1, 2, and 3.1 of the Soil Survey for Scotland, Land Capability for Agriculture Series) should not be developed unless it is essential, allocated in the Local Development Plan or an independent assessment of the site confirms a lesser quality of the land. It is clarified in paragraph PR1.5 that time-limited proposals for renewable energy generation or mineral extraction may be acceptable on prime agricultural land providing the site will be restored and returned to its original status.
- 4.3.54 Paragraph PR1.7 presents a strong presumption in favour of retaining woodland on development sites. Paragraph PR1.7 includes the following:  
‘Development resulting in the loss of, or serious damage to, trees and woodlands of significant ecological, recreational, historical, landscape or shelter value will not normally be permitted. In order to determine whether there are a significant public benefits that would outweigh any loss or damage to trees and woodlands, the developer must submit a Tree Survey to BS5837.’
- 4.3.55 Paragraph PR1.8 outlines that where development is considered appropriate, damage to existing trees must be minimised and there must be no unnecessary fragmentation of existing or potential woodlands networks. Paragraph PR1.8 notes that compensatory planting must also be undertaken.

***Appraisal – Aberdeenshire LDP Policy PR1***

- 4.3.56 The appraisal of the Proposed Development against relevant NPF4 policies contained in Section 4.2 of this Planning Statement considers resources referred to in Aberdeenshire LDP Policy PR1, including air quality, water environment, prime agricultural land, soils, trees and woodland. The Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions reports that fourteen Private Water Supplies (PWS) are within close proximity (250 m) of the PPP Application Boundary and where there is a possibility that dewatering could affect these PWS. The significance of the effect on PWS is predicted to range from minor to moderate adverse. This would be significant in EIA terms and would require further investigation and, potentially, additional mitigation measures. PWS within 250 m of excavations required for the final design will be identified in consultation with Aberdeenshire Council and a detailed risk assessment undertaken seeking to avoid impacts on supplies in line with SEPA guidance. Should a significant impact on a PWS be confirmed, an alternative source of water will be provided. The Contractor will be required to prepare a supply-specific monitoring plan and mitigation strategy in communication with affected landowners.
- 4.3.57 The Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions reports that five potential Ground Water Dependent Terrestrial Ecosystems (GWDTEs) are present in close proximity (250 m) of the PPP Application Boundary, resulting in a potential minor to moderate adverse magnitude of impact due to dewatering. The significance of the effect is predicted to range from minor adverse to moderate adverse. This would be potentially significant in EIA terms and would require further investigation and, potentially, additional mitigation measures. Further investigation will be undertaken to confirm the

status and degree of groundwater connection of the five potential GWDTes and if required additional mitigation proposed for inclusion in the CEMP. Further assessment of potential dewatering impacts may be required depending on the final cable route. Overall it is considered that the appraisal of relevant NPF4 policy and the appraisal in this section demonstrates that support can be drawn from Policy PR1.

### **Aberdeenshire LDP Policy C2 Renewable Energy**

- 4.3.58 Paragraph C2.1 provides support for renewable energy developments, including solar, wind, biomass, and hydro-electric projects, as well as energy storage projects, which are in appropriate sites and of the appropriate design. Paragraph C2.1 outlines that Aberdeenshire Council's assessment of the acceptability of such developments will take account of any effects on: socio-economic aspects; renewable energy targets; greenhouse gas 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. This policy support is not at the expense of other policies regarding Natural Heritage, the Historic Environment and Protecting Resources.

#### ***Appraisal - Aberdeenshire LDP Policy C2***

- 4.3.59 Aberdeenshire LDP Policy C2 provides broad support for renewable energy development provided that there would be no unacceptable effects. However, this policy focuses on renewable energy developments including solar, wind, biomass, hydro-electric and energy storage projects and does not explicitly reference energy transmission infrastructure.
- 4.3.60 NPF4 Policy 11 provides in principle support for renewable energy development (including grid transmission and distribution infrastructure) where it is demonstrated how impacts are addressed. NPF4 Policy 11 is considered to be the more applicable policy to the Proposed Development.
- 4.3.61 It is considered that the appraisal of NPF4 Policy 11 criteria contained in Section 4.2 of this Planning Statement demonstrates that support can be drawn from Aberdeenshire LDP Policy C2.

### **Aberdeenshire LDP Policy C3 Carbon Sinks and Stores**

- 4.3.62 Paragraph C3.1 states that Aberdeenshire Council will:

**4.3.63** 'protect carbon sinks and stores, such as woodland and high-carbon peat rich soils (defined by Scottish Natural Heritage's Carbon and Peatland map 2016 as Class 1, 2 and 5, and greater than 0.5m depth), from disturbance or destruction. Development proposals that may result in the loss of, or disturbance to, peat will only be permitted if tools such as the "Carbon Calculator" demonstrate that the development will, within its lifetime, have no net effect on CO<sub>2</sub>. Removal of woodland will only be permitted if an equal area is replanted, preferably as part of the open space requirement and as part of the green-blue network in the settlement, so as to maintain the carbon balance.'

#### ***Appraisal - Aberdeenshire LDP Policy C3***

4.3.64 Onshore EIA Report, Volume 1, Chapter 15: Climate Change sets out a Whole Life Carbon Assessment (WLCA) has been undertaken to enable potential changes in GHG emissions from the Proposed Development to be quantified. The assessment has considered the potential impact on GHG emissions from the disturbance or destruction of woodland and high-carbon peat rich soils was considered. The Onshore EIA Report, Volume 1, Chapter 10: Geology and Ground Conditions concludes that the potential loss of peat would be of a negligible to minor adverse effect which is not significant in EIA terms. On this basis, the impact of peat disturbance was scoped out of the assessment of GHG emissions in the WLCA. Further information regarding the WLCA assessment is provide in the appraisal of NPF4 Policy 2. It is considered that the appraisal of NPF4 Policy 2 contained in Section 4.2 of this Planning Statement demonstrates compliance with Aberdeenshire LDP Policy C3.

#### **Aberdeenshire LDP Policy C4 Flooding**

4.3.65 Paragraph C4.1 outlines that Flood Risk Assessments should be undertaken in accordance with SEPA's 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. Paragraph C4.1 notes that development should not increase flood risk vulnerability and should avoid areas of medium to high risk, functional flood plain or other areas where the risks are otherwise assessed as heightened or unacceptable subject to certain exceptions. One of these exceptions is where the development is essential infrastructure and an alternative lower risk location is not available.

4.3.66 Paragraph C4.6 outlines that Aberdeenshire Council will not approve development that may contribute to flooding issues elsewhere and that Sustainable Urban Drainage principles apply to all developments.

4.3.67 Paragraph C4.7 outlines that Aberdeenshire Council is opposed to the enclosed culverting of watercourses for land gain.

#### **Appraisal – Aberdeenshire LDP Policy C4**

4.3.68 NPF4 Policy 22 seeks to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

4.3.69 It is considered that the appraisal of NPF4 Policy 22 contained in Section 4.2 of this Planning Statement demonstrates compliance with Aberdeenshire LDP Policy C4.

#### **Aberdeenshire LDP Policy RD1 Providing Suitable Services**

4.3.70 Paragraph RD1.1 outlines that Aberdeenshire Council will only support development that is located and designed to take advantage of or incorporate the services, facilities and infrastructure necessary to support it.

4.3.71 Paragraph RD1.7 outlines that when development requires the formation of new accesses, these should be designed to the agreed standard and should cause minimal impact on the character of the site and surrounding area. Satisfactory arrangements for future maintenance of these access facilities should also be made.

- 4.3.72 Paragraph RD1.8 provides that any new private access onto a public road must be designed to the satisfaction of Aberdeenshire Council's Road and Transportation Service and, in the case of a trunk road, Transport Scotland. Paragraph RD1.8 notes that a Transport Assessment 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.
- 4.3.73 Paragraph RD1.9 outlines that Aberdeenshire Council will support development when the developer satisfactorily meets the required standard for water, wastewater and surface-water drainage servicing in the new development.
- 4.3.74 Paragraph RD1.13 outlines that surface water drainage must be dealt with in a sustainable manner, in ways that promote its biodiversity value, and in ways that avoid pollution and flooding, through the use of an integrated Sustainable Drainage System.
- 4.3.75 Paragraph RD1.16 outlines that Aberdeenshire Council will support new development if the applicant has agreed a Site Waste Management Plan with Aberdeenshire Council.

***Appraisal – Aberdeenshire LDP Policy RD1***

- 4.3.76 In terms of the access considerations of this policy, as set out in relation to NPF4 Policy 11, the Onshore EIA Report, Volume 1, Chapter 14: Traffic and Transport presents the assessment of the traffic and transport impacts of the Proposed Development. The assessment concludes that with the implementation of proposed mitigation measures, no significant effects arising from the Proposed Development are anticipated. Detailed design relating to access would be provided at MSC stage.
- 4.3.77 The Onshore EIA Report, Volume 1, Chapter 11: Water Quality and Flood Risk presents an assessment of the Proposed Development on water quality and flood risk receptors. The assessment concludes that with the implementation of Embedded Mitigation measures and proposed monitoring plans, the Proposed Development is not expected to result in any significant effects on water quality or flood risk, either alone or cumulatively with other projects. Mitigation includes implementation of sustainable urban drainage systems and measures to intercept and attenuate surface water drainage and control of surface water discharges in quality and volume.
- 4.3.78 As detailed previously in the appraisal of Aberdeenshire LDP Policy P1 Layout, Siting and Design, the Onshore EIA Report includes an Outline CEMP which includes commitment to a Site Waste Management Plan (SWMP). The SWMP will be produced at the MSC stage once detailed design is known and will contain good practice measures and procedures to manage all waste produced from the Proposed Development.
- 4.3.79 The Proposed Development is considered to accord with Policy RD1.

## 4.4 Development Plan Conclusions

- 4.4.1 The Development Plan comprises NPF4 and the Aberdeenshire LDP. This section of the Planning Statement has considered the Proposed Development against relevant policies of these documents. The assessments presented in the Onshore EIA Report have informed the policy appraisal.
- 4.4.2 The Proposed Development is classified as National Development under the provisions of NPF4. Annex B of NPF4 – National Developments Statement of Need, 3. ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’ includes the classification: *‘New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.’*
- 4.4.3 NPF4 Policy 11 contains a presumption that all renewable energy development (including enabling works such as grid transmission and distribution infrastructure) will be supported. As such the Proposed Development can draw in-principle support from Policy 11. The appraisal of the Policy 11 criteria demonstrate that the Proposed Development can be positively considered against these criteria.
- 4.4.4 NPF4 Policy 1 makes clear the need to give ‘significant weight’ to the global climate and nature crises when considering all development proposals. Strong support can be drawn from NPF4 Policy 1 for the Proposed Development. The Proposed Development can also be positively assessed against other relevant policies of NPF4 and relevant policies of the Aberdeenshire LDP.
- 4.4.5 Each impact assessment reported in the Onshore EIA Report took account of Embedded Mitigation and where identified in the initial assessment, appropriate and proportionate Additional Mitigation proposed in order to reduce the residual effects to non-significant levels where possible. Overall with the implementation of the Embedded and Additional Mitigation the majority of potential effects of the Proposed Development are predicted to be non-significant. The exception to this are localised significant effects on landscape and visual receptors during the construction, and operation and maintenance phases; temporary impacts on 23 agricultural land holdings during construction; potential for significant effects on five GWDTEs and 14 PWS that will be subject to further consideration and detailed design; and significant cumulative effects in relation to socio-cultural impacts. Significant beneficial effects are also predicted for GHG emissions for Scotland and the UK as a result of the Project.
- 4.4.6 The Project will play a role in fulfilling Scottish and UK renewable energy and climate change reduction targets and will have beneficial impacts for energy security and on the local and Scottish economy, for example through positive contributions towards employment opportunities and wider economic input.
- 4.4.7 Taking these benefits into account, it is considered that the Proposed Development can be positively assessed against the Development Plan as a whole. Overall it is considered that the Proposed Development accords with the Development Plan.

## **5 Climate Change and Energy Policy Considerations**

### **5.1 Introduction**

5.1.1 The Proposed Development which would provide the Bowdun Offshore Wind Farm with a means to connect to the onshore transmission network would contribute to meeting net zero obligations. The following sections provide an overview of some of the UK and Scottish climate change and energy legislation and policy of relevance to the Proposed Development.

### **5.2 UK Climate Change and Energy Legislation and Policy**

#### ***The Climate Change Act 2008***

5.2.1 The Climate Change Act 2008 provides a legal framework to tackle climate change in the UK. The Climate Change Act 2008 also established the Climate Change Committee, an independent, statutory body which advises the UK Government and Scottish Government on emissions targets and reports on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change.

#### ***British Energy Security Strategy (2022)***

5.2.2 The British Energy Security Strategy was published by the UK Government in April 2022. It seeks to reduce the UK's dependence on imported oil and gas and to decarbonise the energy sector. The strategy includes an ambition to deliver up to 50 Gigawatt (GW) of offshore wind by 2030.

#### ***Energy Act 2023 (2023)***

5.2.3 The aim of the Energy Act 2023 is to help increase the resilience and reliability of energy systems across the UK, support the delivery of the UK's climate change commitments and reform the UK's energy system while minimising costs to consumers and protecting them from unfair pricing.

#### ***Powering up Britain – Energy Security Plan (2023)***

5.2.4 The above plan, published by the UK Government in March 2023, sets out the steps the UK Government is taking to ensure the UK is more energy independent, secure and resilient. The introduction notes that energy security '*necessarily entails the smooth transition to abundant, low-carbon energy.*'

#### ***Powering up Britain – The Net Zero Growth Plan (2023)***

5.2.5 The Net Zero Growth Plan was published by the UK Government in March 2023 alongside the Powering up Britain – Energy Security Plan referred to above. The Net Zero Growth Plan sets out how the UK Government aims to enhance the UK's energy security, seize the economic opportunities of the transition and deliver on net zero commitments.

#### ***Clean Power 2030 Action Plan (2024)***

5.2.6 The Action Plan confirms that delivering clean power is at the heart of the UK Government's Plan for Change (UK Government, 2024). The initial focus of the plan is on delivering at least 95% of Great Britain's power generation from clean power by 2030 which includes 43 – 50 GW of offshore wind. Beyond that,

however, the plan confirms that strong growth in power generation from clean sources will be required on a sustained basis through the 2030s and 2040s to reach net zero by 2050.

### **5.3 Scottish Climate Change and Energy Legislation and Policy**

#### ***The Climate Change (Scotland) Act 2009***

- 5.3.1 The Climate Change (Scotland) Act 2009 established a framework for Scotland to achieve its long-term goals of reducing greenhouse gas emissions targets by at least 80% by 2050. An interim target of a 42% reduction by 2020 was also set.

#### ***The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019***

- 5.3.2 The original 2020 target was amended through the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 that was passed in September 2019. This set a ‘net-zero emissions target’ for all greenhouse gas emissions by 2045. The interim targets were amended to become 56% by 2020, 75% by 2030 and 90% by 2040. However, in March 2024, the Climate Change Committee (CCC) concluded that it no longer believed that the Scottish Government would meet its statutory 2030 goal to reduce emissions by 75%. A statement titled ‘Climate Change Scotland report – next steps: Net Zero Secretary statement’ delivered to the Scottish Parliament by the Cabinet Secretary for Wellbeing Economy, Net Zero and Energy on 18 April 2024, accepted that the interim 2030 target is out of reach and included the following:

‘And with this in mind, I can today confirm that, working with Parliament on a timetable, the Scottish Government will bring forward expedited legislation to address matters raised by the CCC and ensure our legislative framework better reflects the reality of long-term climate policymaking.

The narrowly drawn Bill will retain our legal commitment to 2045 alongside annual reporting on progress, whilst introducing a target approach based on five-yearly carbon budgets.’

#### ***The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024***

- 5.3.3 In November 2024, the Scottish Parliament passed the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 which introduced a framework for a carbon budget-based approach for setting emissions reduction targets up to 2045. The Act does not change the existing target of achieving net zero by 2045.

#### ***Scottish Energy Strategy (2017)***

- 5.3.4 The Scottish Energy Strategy was published in December 2017. It set out the Scottish Government’s energy strategy for the period to 2050. One of the six priorities for the 2050 vision is ‘renewable and low carbon solutions’ which states:

‘we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reductions targets.’

### ***Scotland's Energy Strategy Position Statement (2021)***

- 5.3.5 Scotland's Energy Strategy Position Statement was published by the Scottish Government in 2021. It provided an overview of the Scottish Government's key priorities for the short to medium-term and how the Scottish Government has continued to abide by the three key principles set out in Scotland's Energy Strategy published in 2017 and policy design and delivery. It provided an overview of how the Scottish Government committed to ensuring a green recovery, in respect of energy while remaining aligned to net zero ambitions.

### ***Draft Energy and Just Transition Plan 2023***

- 5.3.6 The Scottish Government published the Draft Energy Strategy and Just Transition Plan for consultation in January 2023. It will replace the Scottish Energy Strategy (2017) and the associated Scotland's Energy Strategy Position Statement (2021) when adopted. The consultation period ended in May 2023.

- 5.3.7 The draft document is titled 'Delivering a fair and secure zero carbon energy system for Scotland'. The Ministerial Forward includes the following:

'The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generates economic opportunities, and builds a just transition...'

### ***Offshore Wind Policy Statement (2020)***

- 5.3.8 The Scottish Government published the Offshore Wind Policy Statement in 2020. It includes the statement that '*we believe that as much as 11 GW of offshore capacity is possible in Scottish waters by 2030*'.

### ***Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind ambition (2025)***

- 5.3.9 The Scottish Government published the consultation paper 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind ambition' in June 2025. The consultation period closed in August 2025. The consultation paper sets out an updated ambition for offshore wind in Scotland. *It states that '...the Scottish Government is resetting its ambition and aiming for the development of up to 40 GW by 2035-2040 in addition to our existing operational capacity.'*

## **5.4 Conclusions on Climate Change and Energy Policy Considerations**

- 5.4.1 The Proposed Development which would provide the Bowdun Offshore Wind Farm with a means to connect to the onshore transmission network would draw support from relevant climate change and energy policy in terms of its contribution to meeting net zero obligations and improving the security of energy supply.

## **6 Other Material Considerations**

### **6.1 Introduction**

6.1.1 Aberdeenshire Council approved a Community Wealth Building Strategy and associated Energy Developments Community Wealth Building Charter on 26 June 2025. The following sections provide an overview of the these documents.

### **6.2 Community Wealth Building Strategy**

6.2.1 The Community Wealth Building Strategy outlines that:

‘Communities across Aberdeenshire face a range of social, economic and environmental challenges. Community Wealth Building provides a practical response that aims to create more and keep wealth within a local area. It is often described as a people centred approach to economic development and aims to ensure every area and community can participate in, and benefit from, economic activity.’

6.2.2 The strategy is arranged around the following objectives:

OBJECTIVE 1: Spending.

Through our public spending we will work to maximise our spend within Aberdeenshire, build strong, sustainable local supply chains, deliver community benefit and fair work opportunities.

OBJECTIVE 2: Fair Employment and Just labour Markets.

Ensure that the workforce are in well paid jobs that benefit from an effective voice, security and flexibility.

OBJECTIVE 3: Socially Just use of Land and Property.

We will work to maximise opportunities directly, and with other anchor organisations, to ensure communities across Aberdeenshire can get the most benefit from and generate wealth from local land and property.

OBJECTIVE 4: Financial Power

We will make use of investments to keep money flowing within our places and grow local economies.

OBJECTIVE 5: Shared Ownership of the Local Economy

Encouraging shared and democratic models of business ownership to build wealth that stays in local communities e.g. cooperative, employee owned businesses, municipally owned companies.

### **6.3 Energy Developments Wealth Building Charter**

6.3.1 The Charter states that it ‘sets out the community wealth building expectations and principles to ensure alignment with policies 11 and 25 contained within NPF4 for energy development in Aberdeenshire.’

6.3.2 In addition, it states further that:

‘This Charter sets out what Aberdeenshire Council expects from energy development including renewables and infrastructure and how in return the council will enable its contribution.

It aims to:

- Embed an approach to community wealth building into Aberdeenshire
- Provide a guide for developers as to how to meet the policy requirements of NPF4 and deliver maximum benefit for affected communities
- Engage all relevant stakeholders in identifying how to maximise socio economic benefits
- Unlock economic opportunities in the area.’

6.3.3 The Charter sets out the context of NPF Policy 11 and Policy 25 and states that:

‘In this context it is important to set out a framework for Aberdeenshire to provide guidance to support developers in meeting these obligations and policy requirements and to provide some certainty/comfort to communities that socio economic benefit can and will be realised as a result of the impacts of accommodating these renewable developments are realised in the communities most directly affected.’

6.3.4 In order to maximise the socioeconomic benefit, the Charter identifies seven ‘Collaboration Principles’ for developers outlining the areas where strategic investments and dialogue can be directed:

1. Provide a long-term and collaborative programme on skills development
2. Community Capacity
3. Fuel Poverty
4. Supply Chain
5. Inward Investment
6. Adopt a town centre first approach
7. Place

6.3.5 The Charter provides a framework which details a series of objectives, outcomes and outputs. The objectives are stated below:

- Fair Employment: Promote jobs locally and develop long term and collaborative skills pathways.
- Proactive Procurement: Providing support and opportunity for local business to participate in the supply chain to increase local and regional spend.
- Socially Just use of land and property: more vibrant, safe and resilient communities
- Equality: Addressing rural inequalities and ensuring equality of opportunity for all

## **6.4 Appraisal – Community Wealth Building Strategy and Energy Developments Wealth Building Charter**

- 6.4.1 As referred to in the appraisal of NPF4 Policy 11 and Policy 25 contained in Section 4 of this Planning Statement, an assessment of socio-economic effects has been undertaken as part of the EIA and is presented in Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation of the Onshore EIA Report. Investment in the Project is expected to create jobs, stimulate local industries, and boost economic activity in manufacturing, engineering and infrastructure.
- 6.4.2 Impacts on GVA and employment were assessed for the combined onshore and offshore elements of the Project. The socio-economic assessment sets out that across the full project lifecycle, it is expected that under the ‘Commitments’ scenario, the Project will support:
- 488 full-time equivalent (FTE) jobs, and generate £597 million GVA in the North East region;
  - 1,393 FTE jobs, and generate £1,705 million GVA in Scotland; and
  - 4,170 FTE jobs, and generate £2.2 billion GVA across the UK.
- 6.4.3 The Onshore EIA Report, Volume 1, Chapter 4: Stakeholder Engagement and Consultation sets out the approach to the stakeholder engagement and consultation process undertaken during the pre-application stage. This includes a summary of the wider supply chain and industry engagement undertaken by TWP as the developer of the Project.
- 6.4.4 The Onshore EIA Report, Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation provides information on the Applicant’s approach to supply chain development, skills and workforce development, STEM initiatives, and community empowerment. The Applicant is committed to continuing and progressing these approaches and engagement at the appropriate stages of the Project’s progression.

## **7 Conclusions**

- 7.1.1 This Planning Statement supports an application for Planning Permission in Principle (PPP) for onshore transmission infrastructure associated with the Bowdun Offshore Wind Farm including formation of onshore landfall point, laying of underground cables, erection of substation, and associated works to connect to the transmission grid at Haughs Bay, Benholm connecting to Fetteresso Forest, Aberdeenshire.
- 7.1.2 This Planning Statement supports an application for PPP. The final design specifications of the various elements of the Proposed Development would be submitted to Aberdeenshire Council for approval of matters specified in conditions (MSC) at that stage.
- 7.1.3 The Proposed Development is classified as National Development under the provisions of NPF4. National Developments are significant developments of national importance that will help to deliver the NPF4 spatial strategy.
- 7.1.4 NPF4 Policy 1 makes clear the need to give ‘significant weight’ to the global climate and nature crises when considering all development proposals.
- 7.1.5 NPF4 Policy 11 contains a presumption that all renewable energy development (including enabling works such as grid transmission and distribution infrastructure) will be supported. The appraisal of the criteria in Policy 11 demonstrates that the Proposed Development can be positively considered against these factors.
- 7.1.6 A thorough site selection and design process has been undertaken by TWP to avoid potential environmental impacts. It is recognised that significant environment effects can be expected for renewable energy transmission infrastructure project such as the Proposed Development. Where significant environmental effects have been identified these have been mitigated as far as practicable.
- 7.1.7 The Project can draw support from relevant UK and Scottish Government climate change and energy policy considered in Section 5 of this Planning Statement in terms of contribution to meeting net zero obligations and improving the security of energy supply. The Project will also have positive impacts on the local and Scottish economy, for example through positive contributions towards employment opportunities and wider economic input.
- 7.1.8 Overall it is concluded that the Proposed Development complies with the relevant Development Plan policies. The Proposed Development can draw support from relevant material considerations. It is respectfully requested that the application for PPP is granted subject to relevant planning conditions.