Onshore Planning Statement

MarramWind Offshore Wind Farm

December 2025

MarramWind

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Contents

1. Introduction

1.1.1.1 This Onshore Planning Statement ("Planning Statement") supports an application for Planning Permission in Principle (PPiP) submitted to Aberdeenshire Council under the Town and Country Planning (Scotland) Act 1997. The application relates to the onshore infrastructure landward of Mean Low Water Springs (MLWS) forming part of the MarramWind Offshore Wind Farm.

1.1.1.2 MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') is wholly owned by ScottishPower Renewables UK Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

1.1.1.3 The Project is a proposed floating wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW). The location of the Project is determined by the Option Area Agreement (OAA), which is the spatial boundary of the Northeast 7 (NE7) Plan Option, as identified within the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy (2020a) publication. The Project's electricity generating infrastructure will be located within the NE7 Plan Option, which is located north-east of Rattray Head on the Aberdeenshire coast in north-east Scotland, approximately 75 kilometres (km) at its nearest point to shore and 110km at its furthest point. An Option to Lease Agreement for the Project within the NE7 Plan Option was signed in April 2022.

1.2 MarramWind Offshore Wind Farm

1.2.1.1 The Project's generating and offshore transmission infrastructure will be located in the North Sea, within the 'Scottish Zone' (as defined in the Scotland Act 1998) of the UK Exclusive Economic Zone.

1.2.1.2 The Project's Red Line Boundary is a geographical area within which the offshore wind farm and associated onshore and offshore infrastructure will be located. It represents the boundary identified for the relevant planning and consent applications. The Red Line Boundary is presented in **Volume 2, Figure 1.1** of the accompanying **Environmental Impact Assessment (EIA) Report** and described in **Volume 1, Chapter 4: Project Description** of the **EIA Report**. In addition to the Project's overall Red Line Boundary, **Volume 2, Figure 4.1** of the **EIA Report**, which shows the Onshore Red Line Boundary and indicative onshore infrastructure, as described in **Section 2** below.

1.2.1.3 This Planning Statement considers the Project's onshore infrastructure, located landward of MLWS, which comprises:

- landfall(s) – the infrastructure associated with connecting the offshore export cables with the onshore export cables located above MLWS. At this stage two landfall options have been identified;
- onshore export cables running from the landfall(s) to the onshore substations;
- three onshore substations (one per project phase) co-located at one site;
- underground grid connection cables (connecting the onshore substations to the grid connection point at the Scottish and Southern Electricity Network (SSEN) Netherton Hub); and,
- grid connection point[1].

[1] SSEN substation at the SSEN Netherton Hub, which is a separate consented project and does not form part of the consenting applications. This is discussed further in **Section 2.2**.

1.2.1.4 The components of the Project located seaward of Mean High Water Springs (MHWS) are subject to parallel consent applications, as set out in **Section 1.3**, below.

1.2.1.5 All onshore infrastructure located above MLWS is consented under the Town and Country Planning (Scotland) Act 1997. The Marine and Coastal Access Act 2009 and The Marine (Scotland) Act 2010 has a landward jurisdictional limit of MHWS. Since marine licencing covers the marine area up to MHWS and terrestrial planning control extends down to MLWS, there is an overlap of consenting regimes in the intertidal zone.

1.2.1.6 The intertidal zone is defined as the area between MLWS and MHWS. The term 'offshore' refers to environmental features located on the seaward side of MHWS and 'onshore' refers to environmental features on the landward side of MLWS. It is acknowledged that this approach creates an area of overlap, i.e. the 'intertidal' area between MLWS and MHWS. This is considered appropriate given the overlap between the respective consenting regimes. Additional detail on the relevant consenting regimes and legislative and policy context is set out within **Volume 1, Chapter 2: Legislative and Policy Context** of the accompanying EIA Report.

1.3 Purpose and structure of the Planning Statement

1.3.1.1 The purpose of this Onshore Planning Statement is to support the application for Planning Permission in Principle (PPiP) for the proposed onshore infrastructure forming part of the Project. This Statement demonstrates the need for the onshore infrastructure, provides supporting information regarding Project delivery, and evidence accordance with the Development Plan and other relevant material considerations. In doing so, the Planning Statement provides a robust justification for the granting of planning permission in principle.

1.3.1.2 As a National Development under National Planning Framework 4 (NPF4), the principle of the Project is established at the national level. It is expected that the determination of the application should therefore focus on the detailed impacts, mitigation, and conditions, rather than the acceptability of the development in principle. This is discussed further in **Section 6.1**.

1.3.1.3 This Planning Statement provides a summary of the conclusions found within the relevant EIA Report chapters and other supporting documents and provides a detailed assessment of policy compliance against the relevant policies detailed in the above documents.

1.3.1.4 As highlighted above, a separate Planning Statement will be provided for the proposed offshore infrastructure forming part of the Project, and as such, the offshore infrastructure and components will not be considered in this Planning Statement.

1.3.1.5 The Planning Statement is set out as follows:

- **Section 1: Introduction**;
- **Section 2: Site and Project Description**;
- **Section 3: The Need for and Benefits of the Project**;
- **Section 4: Statutory Consultation and Engagement**;
- **Section 5: Legislation and Policy Context**;
- **Section 6: Policy Assessment**; and
- **Section 7: Planning Balance and Conclusions**.

1.4 Overview of consents and applications

1.4.1.1 PPiP is being sought to deliver the proposed onshore infrastructure of the Project, as outlined in **Section 2.3**.

1.4.1.2 The offshore electricity transmission works, and associated generation infrastructure will be consented under Section 36 of the Electricity Act 1989, alongside the associated Marine Licence applications. These offshore applications are being submitted to the Marine Directorate – Licensing Operations Team (MD-LOT), on behalf of the Scottish Ministers, and include applications for Marine Licences under both the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009.

1.4.1.3 An Offshore Planning Statement has also been prepared to accompany this application, reflecting the structure and content of this Planning Statement while addressing the offshore context. The Environmental Impact Assessment (EIA) Report has been prepared to support both the onshore and offshore consent applications.

1.4.2 Pre-application advice

1.4.2.1 The Applicant has engaged with Aberdeenshire Council since 29th June 2022 and subsequently the Council's Strategic Development Delivery Planning Team when the pre-application process commenced. The focus of this engagement was a formal Pre-Application Advice process (ENQ/2024/0657), entered into on 15 August 2024 until the submission period.

1.4.2.2 Meetings between the Applicant and Aberdeenshire Council's Strategic Development Delivery Planning Team have occurred every six weeks since 7 November 2024 with further meetings also held prior to this date.

1.4.2.3 The full schedule of engagement with Aberdeenshire Council is outlined below:

Table 1.1 Engagement with Aberdeenshire Council

Year	Date	Summary of discussions with Aberdeenshire Council
2022	29 June	• Grid connection for 1.5GW confirmed at Peterhead via Holistic Network Design (HND). • Planning and engagement strategy initiated with Scoping Report.
	28 September	• Scoping Report preparation for onshore and offshore elements. • Technical engagement on air quality, noise, and transport impacts.
	2 November	• Scoping Report submission timing and process discussed.
2023	14 March	• Ecology survey programme launched. • Consultation plans outlined.
	27 June	• First community drop-in event held. • Technical coordination across multiple disciplines.

Year	Date	Summary of discussions with Aberdeenshire Council
	1 August	• Planning strategy confirmed – Intention to pursue PPiP application.
	11 September	• Built heritage and archaeology discussions. • Onshore infrastructure optioneering update. • Heritage impact buffers defined (500m buried, 2km visual).
	21 November	• Refined landfall options presented. • Onshore optioneering progress. • Landowner engagement underway.
2024	30 April	• PPiP application scheduled for late 2025. • Continued refinement of landfall, substation, and cable corridor options. • Clarification that engagement with Aberdeenshire Council's formal pre-application advice service would begin upon receipt of signed pre-application forms.
	1 July	• Statutory Consultation 1 completed.
	5 September	• Proposal of Application Notice Addendum submitted. • Statutory Consultation 2 scheduled. • Landscape, visual, and heritage coordination discussed.
	7 November	• Regular 6-weekly meetings and workshops agreed. • Statutory Consultation 2 completed. • Updates on cumulative effects, Nature Positive Strategy, and planning fees.
	21 November	• Pre-Application Meeting held. • Technical feedback on transport, landscape, flood risk, noise, and ecology.
	19 December	• Pre-Application Advice Report received from Aberdeenshire Council.
2025	30 January	• Single EIA confirmed onshore and offshore submissions. • Socio-Economic Action Plan to be submitted alongside EIA Report.
	10 April	• PPiP application expected December 2025. • Traffic and transport queries discussed.
	3 June	• Planning programme, grid connection, and Red Line Boundary updates. • Traffic and transport engagement. • Roads Development Team follow-up scheduled.
	28 July	• LVIA landscape character subdivisions agreed. • Mitigation strategy supported including Nature Positive Plan.

Year	Date	Summary of discussions with Aberdeenshire Council
	28 August	• Statutory Consultation 3 completed. • Statutory Consultation 4 planned for Q4 2025.
	9 October	• PPiP submission confirmed for 10 December 2025. • Printing and portal submission procedures clarified for EIA Report.
	20 November	• Statutory Consultation review. • PPiP application submission arrangements.

1.4.3 The requirement for an Environmental Impact Assessment

1.4.3.1 EIA is a process for identifying and assessing the likely significant environmental effects (positive and negative) of a proposed development to inform the decision-making process for development consent to be granted.

1.4.3.2 The purpose of the EIA is to help the decision makers, statutory consultees, other stakeholders, and the public understand the predicted likely significant effects and the scope for avoiding, preventing, reducing, and if possible, offsetting them, before a decision is made as to whether to permit development.

1.4.3.3 The following EIA regulations have informed the accompanying EIA Report:

- The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- The Marine Works (Environmental Impact Assessment) Regulations 2007 (applies to applications that require an EIA for a marine licence from 12 – 200 nautical miles (nm)); and
- The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

1.4.3.4 The accompanying EIA Report therefore supports the determination of the PPiP application for the Project. In particular, this EIA Report provides an assessment of the likely significant effects associated with the Project during its construction, operation & maintenance (O&M), and decommissioning stages. This Planning Statement includes cross-references to the corresponding EIA Report chapters where detailed assessments are documented as required, ensuring clarity and ease of navigation for the determining authority.

1.4.3.5 The scope of the EIA was informed by a formal Scoping Opinion issued by Aberdeenshire Council on 12 May 2023 (Scottish Ministers, 2023) and MD-LOT's Scoping Opinion (2023). Aberdeenshire Council also provided a Pre-application Advice Report in December 2024 which has been taken into account when preparing this application for planning consent.

1.4.3.6 The approach to EIA, including the EIA regulations applicable to the onshore consent, is set out in the **Volume 1: Chapter 5: Approach to the EIA** of the **EIA Report**.

1.4.4 Land rights

1.4.4.1 MarramWind Ltd intends to secure the Project's necessary land rights through voluntary agreements with all affected landowners and occupiers. MarramWind is committed to open engagement with affected parties in negotiating these agreements. The Project recognises the need for collaboration between developers in the Peterhead area and will continue to pursue this as required. In addition, the Project has secured a Generation Licence from OFGEM and as such will have the ability to launch a Compulsory Purchase Order (CPO) if it is deemed necessary and appropriate.

2. Site and Project Description

2.1 Site location and surroundings

2.1.1.1 The onshore elements of the Project are located in Aberdeenshire, Scotland and are identified in detail within **Volume 2, Figure 4.1** of the **EIA Report**.

2.1.1.2 In addition to the Project-wide Red Line Boundary, an Onshore Red Line Boundary figure has been prepared showing all onshore elements for which consent is being sought. The Onshore Red Line Boundary is included in **Volume 2, Figure 4.1: Onshore Red Line Boundary and indicative onshore infrastructure** of the **EIA Report**. The Onshore Red Line Boundary encompasses an area of approximately 7.6km^2 and has an elevation ranging from approximately 0.8 m above ordnance datum (AOD) at its lowest point in the eastern area of the Onshore Red Line Boundary, rising to approximately 59.3m AOD in the southern area of the Onshore Red Line Boundary.

2.1.1.3 The Onshore Red Line Boundary is predominately situated on agricultural land, with residential areas at St Fergus to the west, and Inverugie to the south-east. The larger town of Peterhead also lies to the south-east, and scattered dwellings are present in the surrounding area. Longside Airfield is located directly to the west of the Onshore Red Line Boundary and is located to the north of the onshore substations.

2.1.1.4 The Onshore Red Line Boundary has good accessibility from the A950 highway to the west of Peterhead and also from the A90, which intersects the Onshore Red Line Boundary in the north.

2.1.1.5 There are numerous watercourses present within the Onshore Red Line Boundary, these range in size from field drainage ditches to the River Ugie and its wider catchment. The majority of these watercourses drain into the River Ugie, which is formed from the confluence of the North and South Ugie Waters and flows in a predominantly eastern trajectory before discharging into the North Sea, directly north of Peterhead.

2.2 Design evolution and site selection

2.2.1.1 As detailed in **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** of the **EIA Report**, a design process was undertaken to determine the most suitable Project site. The chapter summarises the site selection process, describes the alternatives considered, and the reasons for choosing the selected option(s), before explaining the outcomes of the process that have led to the refinement of the Project.

2.2.1.2 The site selection process for the Project was framed between two locations: the OAA in the marine environment and the point of grid connection onshore. All site selection, routing, optioneering and consideration of alternatives have taken place between these two defined locations.

2.2.1.3 The Project's design evolution aimed to be systematic, analytical, impartial, consultative and iterative allowing opportunities for environmental and planning policy constraints to be addressed, alongside the technical and economic considerations for the Project.

2.2.1.4 This process was iterative and enabled the development of environmental measures that have been embedded directly into the design of the Project. These are referred to as 'embedded environmental measures' (discussed in further detail in **Volume 1, Chapter 5: Approach to the EIA** and set out within **Volume 3 Appendix 5.2: Commitments Register** of the **EIA Report**).

2.2.1.5 A Design and Access Statement (DAS) has been prepared to accompany this planning application. The DAS details the design measures which have been implemented to ensure the Project aligns with good design and access provision, including the planning advice notes identified in the Aberdeenshire Council Pre-Application Advice Report (Aberdeenshire Council, 2024). This is discussed further in **Section 5.2**.

Grid connection location

2.2.1.6 The National Electricity System Operator (NESO) Beyond 2030 Report (NESO, 2024) identified the location for the full 3GW connection as being within the vicinity of Peterhead, subject to detailed siting and design work to be undertaken by SSEN as the Transmission Operator. SSEN have since identified the Project's connection point as the Netherton Hub at Longside near Peterhead, which was granted PPiP by Aberdeenshire Council in August 2025.

2.2.1.7 It should be noted that whilst the Project will connect into the recently consented Netherton Hub, this is a discrete application and does not relate to this Project.

Mitigation hierarchy

2.2.1.8 As part of the Project's design process and in response to consultation, embedded environmental measures have been adopted to reduce the potential for environmental impacts and effects. These measures were established at the Scoping stage and have been developed into the Commitments Register (see **Volume 3, Appendix 5.2** of the **EIA Report**), which has enabled them to feed iteratively into the EIA. As there is a commitment to implementing these embedded environmental measures and to various standard sectoral practices and procedures, they are inherently considered part of the design of the Project. Reflecting the 'in principle' nature of the planning permission which is presently sought for the onshore infrastructure and the relatively early design maturity of the wider Project, many of the commitments are addressed within a suite of outline plans which support the consenting applications. Further definition and detail will be generated in the detailed design phase following any consents granted for the project.

2.2.1.9 The embedded environmental measures have been developed in accordance with the mitigation hierarchy, a fundamental principle in design evolution that indicates the order in which the impacts of a development should be considered and addressed. The EIA Regulations define the mitigation hierarchy as follows:

- avoid;
- prevent;
- reduce; and
- offset.

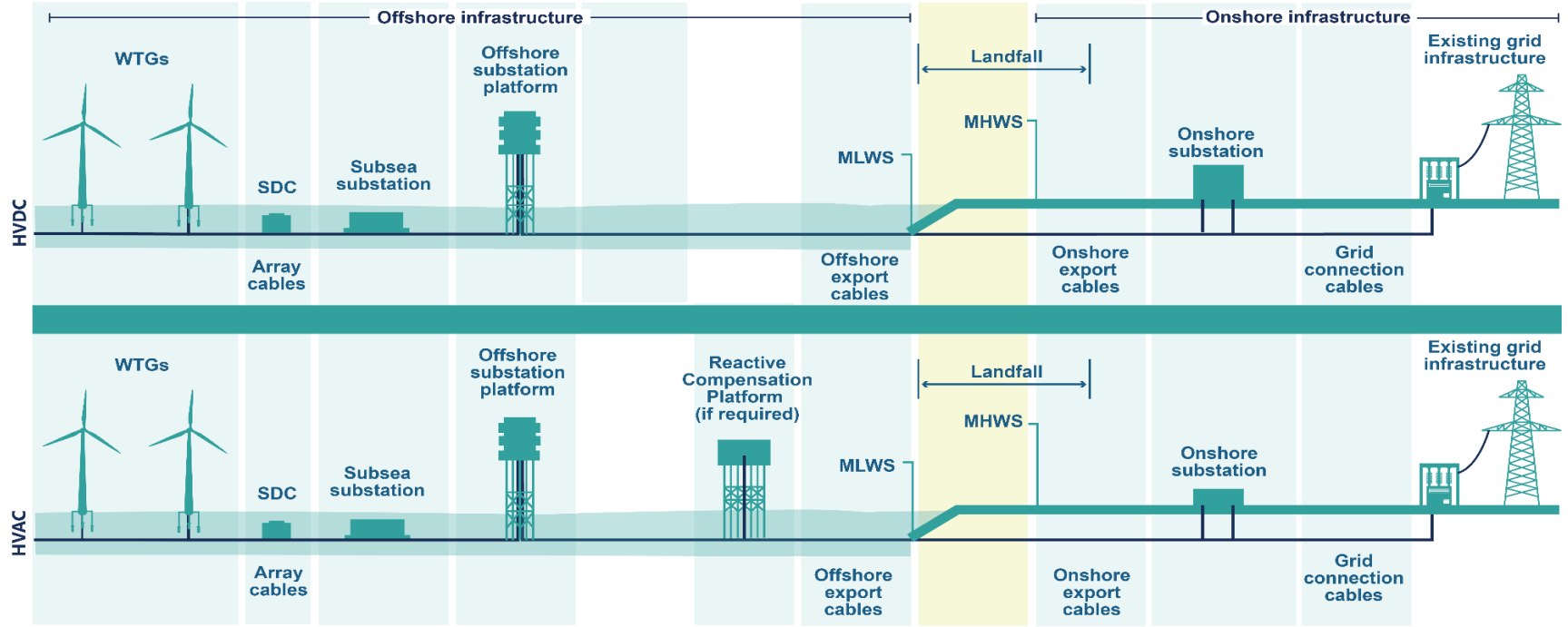
2.3 Project Description

2.3.1.1 The onshore elements of the Project refer to works landward of MLWS and are set out in **Section 1.2** and detailed within **Volume 1, Chapter 4: Project Description** of the **EIA Report**. In addition to these permanent components of the onshore development, temporary development will also be required including temporary construction compounds, access tracks and haul roads.

2.3.1.2 **Plate 2.1** further helps to identify the key components of the offshore and onshore elements of the Project. It should be noted that the offshore substation will be included within the Transmission Marine Licence application and does not fall under the s.36 consent. Whilst a brief description of the key components has been outlined below, **Volume 1, Chapter 4: Project Description** of the **accompanying EIA Report** contains a thorough explanation of the proposed onshore infrastructure of the Project.

2.3.1.3 As per the Pre-Application Advice Report (Aberdeenshire Council, 2024) and outlined in **Volume 4: Outline Construction Traffic Management Plan, Volume 4, Appendix 1: Outline Travel Plan** of the **EIA Report**, parking provision has been included as part of the onshore infrastructure.

Plate 2.1 Offshore and onshore consenting regimes



Marine & Coastal Access Act 2009
from 12 – 200 nautical miles

Marine (Scotland) Act 2010
from MHWS to 12 nautical miles

A total of four Marine Licences will be submitted: one covering the generation assets and three covering the transmission infrastructure

Electricity Act 1989
A single Section 36 application will be submitted for the full 3GW, covering the offshore generation infrastructure

Town & Country Planning (Scotland) Act 1997
Planning Permission in Principle will be submitted for onshore grid connection and all infrastructure located landward of MLWS

UK-62280725 2.1 Offshore and onshore consenting regimes_Rev10.ai

2.4 Delivery

2.4.1 Infrastructure covered by each consenting application

2.4.1.1 Due to overlapping jurisdictions, infrastructure within the intertidal zone, will be covered by both the PPiP application and transmission marine licences. Whilst a single PPiP application is being submitted, separate marine licence applications are being submitted owing to the potential need to assign these to different Offshore Transmission Operators (OFTOs) for each phase of the Project.

2.4.2 Project timeline and phasing

2.4.2.1 Given the scale of the Project, a phased approach to the installation and energisation of the Wind Turbine Generators (WTGs) is proposed. The Applicant intends to apply the design envelope approach to the EIA, which will provide the reasonable worst-case parameters or scenario that will encompass the flexibility required for relevant Project infrastructure. Due to the extensive onshore and offshore enabling works required to provide the 3GW capacity for the Project to connect into SSEN Netherton Hub, The NESO / SSEN have proposed a staged connection with access to grid capacity to be made available in stages. The grid capacity availability is dependent on the enabling works delivery timelines and therefore earliest in service dates that could be possible for the Project.

2.4.2.2 In addition, the Connections Reform process is looking to simplify and rationalise the current grid queue system. This process will result in a revised contract being issued to the Project by end Q3 2026. The Project will review this once received prior to entering into a formal signed contract with confirmed connection dates.

2.4.2.3 Whilst the grid connection offer provides the basis of a three-phased approach for the installation and energisation of the Project, there are other factors that may influence the final design / phasing requirements, for example:

- Route to market - it is necessary to retain flexibility both in terms of size and timing due to the inherently competitive nature of current Contracts for Difference (CfD) process and a Government mandated maximum budget, which is unlikely to be able to support a single 3GW application. It is also anticipated that the CfD process may change in the coming years.
- Supply chain for floating units and WTGs original equipment manufacturers – the capabilities and availability related to the commercial scale build out of floating units remains under development. The value and risk profile of the supply chain to be able to commit to a single 3GW contract on new technology is also considered to be a constraint to phasing size.
- Transmission technology - further technological advances may influence the electrical transmission option to be adopted for each phase.

2.4.2.4 Additional detail on this phased approach is set out in **Volume 1, Chapter 4: Project Description** of the **EIA Report**. The Project's phasing, alongside the requirement to discharge conditions in their entirety, will shape the conditions applied to the consent. Whilst all of the onshore infrastructure is covered by a single PPiP application, as any PPiP granted is not exclusive to a particular applicant or infrastructure component, it is expected that separate conditions relating to infrastructure to be delivered in each phase (e.g. detailed design of substations) will be required. This is considered further in **Section 2.4.7**, below.

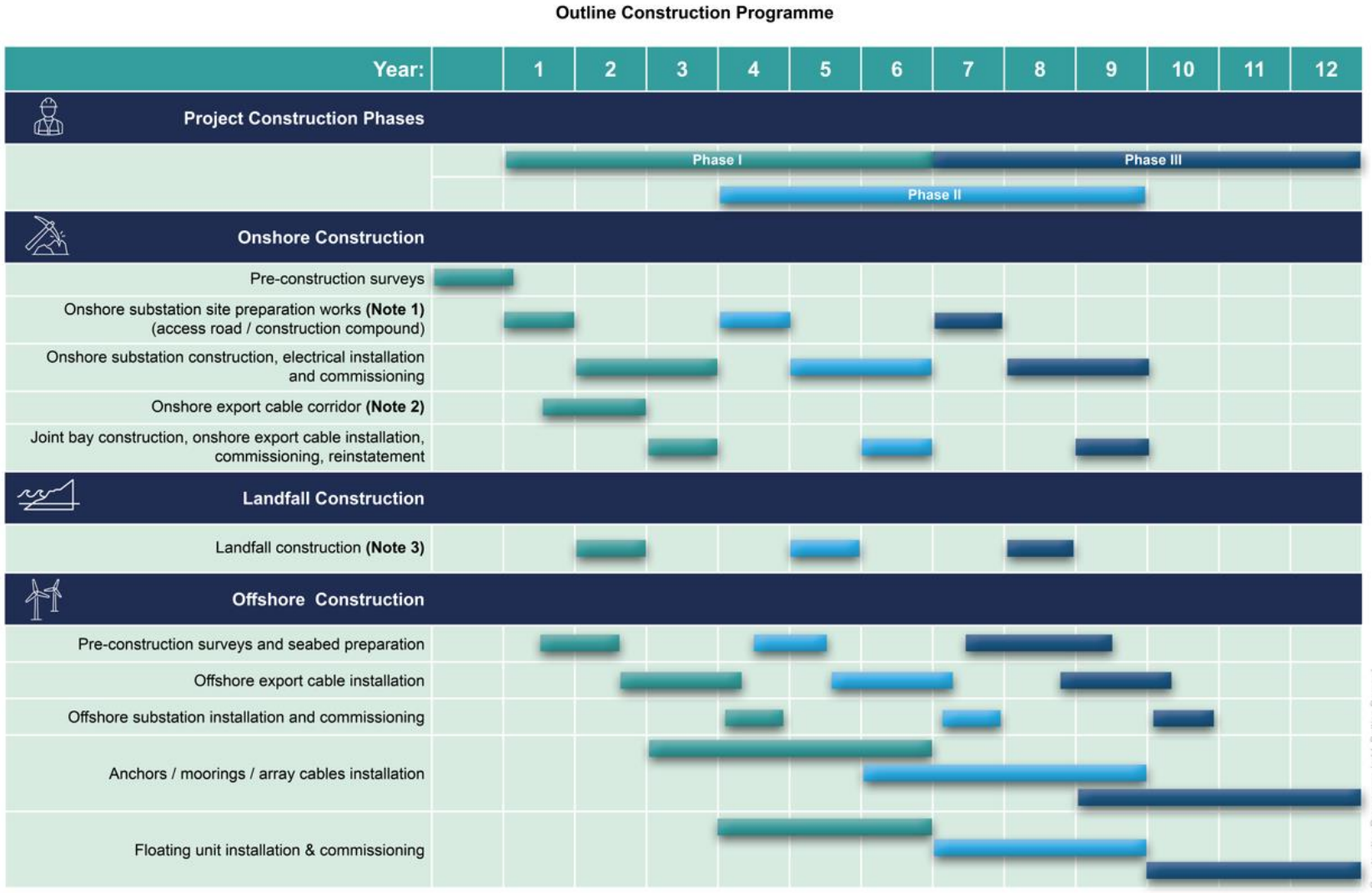
2.4.2.5 The description of the Project for the EIA is indicative and a 'design envelope' approach, also known as the 'Rochdale Envelope', has been adopted. The Applicant has applied the Rochdale Envelope principle to the accompanying EIA which provides the reasonable worst-case parameters or scenario that will encompass the flexibility required for relevant Project infrastructure.

2.4.3 Construction

2.4.3.1 An indicative construction programme for the Project is presented in **Plate 2.2** . The programme illustrates the anticipated duration of the main construction / installation activities by infrastructure component. The Project will be delivered in phases, which are reflected in the indicative construction programme. It is anticipated that construction of the Project would commence in 2030.

2.4.3.2 The overall duration of construction of the offshore infrastructure is anticipated to be up to 12 years. This will be subject to the final grid connection date, supply chain discussions and further site surveys (pre-consent).

Plate 2.2 Indicative construction programme



Note 1: Permanent roads built as part of first phase onshore substation build. No further permanent roads required as part of second & third phases.
Note 2: Includes site preparation works (access / haul roads, construction compounds), cable trenching, horizontal directional drilling works and duct installation for all Project phases.
Note 3: Includes site preparation works (access road / construction compound), transition joint bay construction, horizontal directional drilling works and associated duct installation.

Construction timing

2.4.3.3 As outlined in **Volume 4: Outline Construction Environmental Management Plan**, core working hours for onshore construction works for the Project are as follows:

- 08:00 to 18:00 hours Monday to Friday; and
- 08:00 to 13:00 hours on Saturday.

2.4.3.4 Prior to, and following, the core working hours Monday to Friday, a 'shoulder hour' for mobilisation and shut down will be applied (07:00 to 08:00 and 18:00 to 19:00) for which restrictions are described further in **Volume 4: Outline Construction Environmental Management Plan**. No activity outside of these hours, including Sundays, public holidays or bank holidays will take place apart from under the following circumstances:

- where continuous periods (up to 24-hours, 7 days per week) of construction work are required for Horizontal Directional Drilling (HDD) (or similar trenchless technique);
- for other works requiring extended working hours such as concrete pouring which will require the relevant planning authority to be notified at least 72 hours in advance;
- for the delivery of abnormal loads to the connection works, which may cause congestion on the local road network, where the relevant highway authority has been notified prior to such works 72 hours in advance; or
- as otherwise agreed in writing with the relevant planning authority.

2.4.4 Operation and Maintenance

2.4.4.1 Given the scale of the Project, a phased approach to the installation and energisation of the WTGs is proposed. It is anticipated that the first phase of the Project would become fully operational in 2037 following commissioning of the WTGs for phase 1. It is anticipated the second phase of the Project would become fully operational in 2040 and the third phase in 2043. The operational lifetime of the Project for each phase is expected to be around 35 years. Additional detail on the phased approach to be adopted and further details on the construction of the onshore elements of the Project are set out in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.4.4.2 Operation and maintenance (O&M) activities will be categorised as either scheduled or unscheduled, with frequencies ranging from daily remote monitoring to occasional component replacements. While the Applicant will oversee O&M for the generating assets, transmission infrastructure such as offshore substations and export cables will be transferred to an OFTO in line with the Electricity Act 1989. This is discussed further in the **Offshore Planning Statement**.

2.4.4.3 The Project is committed to ensuring the long-term reliability and performance of the wind farm through a comprehensive and well-planned O&M strategy. The strategy will be designed to minimise environmental impact while maintaining operational efficiency. An O&M strategy that includes regular inspections, safety protocols, and environmental management plans will be adopted.

2.4.4.4 Onshore infrastructure will require minimal maintenance, with periodic cable testing and occasional unscheduled maintenance and repairs using light vehicles or, rarely, heavy goods vehicles. Infrequently, the onshore export cable may need to be repaired, and sections replaced.

2.4.4.5 The onshore substations will be remotely monitored and maintained during scheduled outages, with lighting and foul drainage systems designed for efficiency and minimal impact.

Inspection and minor servicing may be required for the electrical plant, but it is anticipated that the onshore substations will require minimal scheduled maintenance and operation activities. There may be a requirement for unscheduled maintenance or emergency repairs and infrequently equipment may need to be replaced.

2.4.4.6 Maintenance practices for cables connecting to the SSEN Netherton Hub will follow the same protocols as those used between landfalls and substations.

2.4.4.7 Additional detail on the O&M stage, commitments and activities has been included in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.4.5 Decommissioning

2.4.5.1 The decommissioning stage will commence at the end of the operational lifetime of the Project. The decommissioning duration of the onshore infrastructure may take the same amount of time as construction of the Project, up to 9 years, although this indicative timing may reduce. Materials would be reused or recycled, where possible, with the remainder of any material to be disposed with a licensed waste disposal site.

2.4.5.2 Prior to decommissioning taking place, an onshore decommissioning plan will be submitted and agreed with Aberdeenshire Council.

2.4.5.3 It is anticipated that the onshore electrical cables will be left in-situ with ends cut, sealed and buried to minimise environmental effects associated with removal. The underground structures of the transition jointing bays, joint bays, fibre optic cable junction boxes and link boxes will be removed only if it is feasible with minimal environmental disturbance or if their removal is required to return the land to its current agricultural use. It should be noted that, whilst this is the current assumption, the regulations and practice applicable at the time of planning for decommissioning will be reviewed and followed.

2.4.5.4 The onshore substations and associated access roads will be removed and the site reinstated. The decommissioning works are likely to be undertaken in reverse to the sequence of construction works and involve similar types and levels of equipment and vehicles. The onshore substation site will be restored to its original state or made suitable for an alternative use.

2.4.5.5 Further detail will be provided in an onshore decommissioning plan, prepared prior to the start of any decommissioning activities.

2.4.6 Implementation plans

2.4.6.1 Various onshore implementation plans have been prepared to accompany this planning application. These plans demonstrate how environmental commitments will be delivered during construction and operation of the Project and include the following:

- **Volume 4: Outline Construction Environmental Management Plan** of the **EIA Report**;
- **Volume 4: Outline Operation Drainage Management Strategy** (including: **Appendix 1: Outline Indicative Sustainable Urban Drainage Plan for the Onshore Substation during Operation**) of the **EIA Report**;
- **Volume 4: Outline Written Scheme of Investigation (Onshore)** of the **EIA Report**;
- **Volume 4: Outline Construction Traffic Management Plan** of the **EIA Report** (including: **Appendix 1: Outline Travel Plan; and Appendix 2: Outline Core Path Management Plan**); and

- **Volume 4: Outline Landscape and Architectural Strategy** of the **EIA Report** (including**: Appendix A Supporting Figures and Appendix B Outline Landscape Maintenance Plan**).

2.4.6.2 As part of the discharge of conditions finalised implementation plans will be prepared, providing detail in addition to the outline plans noted above. It is anticipated that the preparation of these finalised implementation plans may be secured under conditions which Aberdeenshire Council may attach to the PPiP. These conditions will be discharged upon submission of the finalised plans to Aberdeenshire Council.

2.4.7 Approach to Conditions

2.4.7.1 As per Section 37 and Section 41 of the Town and Country Planning (Scotland) Act 1997, Aberdeenshire Council will have the opportunity to apply conditions to the approval of PPiP consent. The Approval of Matters Specified in Conditions (AMSC) will be sought through subsequent applications to Aberdeenshire Council with the conditions addressing topics such as detailed design, implementation arrangements and supporting plans where necessary. Each AMSC submission will be a standalone application and include a strategy for the conditions' proposed discharge.

2.4.7.2 It is expected that the conditions placed on the consent will ensure that construction of the onshore infrastructure can proceed in a phased, controlled and deliverable manner. The AMSC conditions will be tied to the PPiP consent rather than the Applicant, thus enabling a multi-party implementation approach.

2.4.7.3 Given the phased nature of the Project and the requirement to discharge conditions in full, condition wording will need to reflect the proposed phased build-out. This approach will enable the Applicant to address relevant conditions in a manner that facilitates the delivery of each phase of development, without constraining the implementation of subsequent construction stages.

2.4.7.4 The Applicant appreciates that there is likely to be engagement between MD-LOT and Aberdeenshire Council as part of the planning process, given that MD-LOT is concurrently setting conditions for the s.36 and Marine Licence applications associated with the offshore consents for the Project. Coordinated engagement will help ensure consistency across consenting regimes and support a more streamlined and effective approach to condition-setting.

2.4.7.5 The anticipated framework of conditions to be applied to the PPiP consent has been outlined in **Appendix A: Key Considerations for Conditions**, below. This table considers the nature of conditions which may be applied to the consenting application, and the associated phasing where applicable. In order to ensure the efficient design and discharge of these conditions, the Applicant would welcome early discussion with MD-LOT on the expectations of the structure and wording of proposed conditions.

3. The Need for and Benefits of the Project

3.1 Introduction

3.1.1.1 A summary of the key policy and legislation against which the Project is outlined in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1: Planning Policy Framework** of the **EIA Report**. This Section explains how the Project responds to key climate change and energy legislative and policy drivers and identifies the needs case for the proposed onshore infrastructure forming part of the Project.

3.1.1.2 The onshore elements of the Project are fundamental to enabling the delivery of renewable energy generated offshore, ensuring that clean electricity can be transmitted across Scotland, into England, and the wider UK. This integrated approach is essential to achieving national and international climate and energy targets.

3.1.1.3 At the international level, the legally binding Paris Agreement (United Nations Framework Convention on Climate Change, 2015) commits the UK to ambitious greenhouse gas (GHG) reductions, aiming to limit global warming to well below 2° Celsius compared to pre-industrial global average temperature levels, with a preferred target of limiting global warming to 1.5° Celsius. This ambition indicates the urgency of decarbonisation and climate change.

3.1.1.4 As discussed below, publications by the UK and Scottish Governments set out emission reduction targets and underline the need for the rapid deployment of offshore wind developments, such as MarramWind Offshore Wind Farm, across the UK.

3.1.1.5 NPF4 prioritises development which addresses the global climate emergency and identifies strategic-scale renewables, such as offshore wind, as national developments under Annex B of NPF4 – National Development Statements of Need (see page 97), under category 3: Strategic Renewable Electricity Generation and Transmission Infrastructure. This designation confirms the national need for the Project and establishes that the principle of the development is accepted at the national level.

3.2 Climate change

3.2.1.1 The Climate Change Act (2008) (UK Government, 2008) legally binds the UK to reduce GHG emissions by at least 80% by 2050 compared to 1990 levels. The Climate Change (Scotland) Act 2009 (Scottish Government, 2009) builds on this UK legislation and provides the Scottish framework.

3.2.1.2 In Scotland, the Climate Change Plan (Scottish Government, 2020b) and Climate Change (Emissions Reduction Targets) (Scotland) Act (Scottish Government, 2024) set a statutory target of net zero by 2045, with interim milestone reductions of 75% reduction by 2030 and 90% by 2024. The Scottish Government's ambition for 8GW - 11GW of installed offshore wind capacity by 2030, and the proposed updated target of 40GW of new capacity by 2035 - 2040, further emphasises the need for large scale deployment such as the Project.

3.2.1.3 The Scottish Government's Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 (Scottish Government, 2024) sets out the aim to replace annual and interim targets with multiyear carbon budgets to ensure Scottish Ministers are legally bound to meet these goals. The Scottish Government's commitment to achieving the stated targets depends upon a combined effort from the renewable energy sector, including offshore wind. This requirement for a concerted effort to achieve climate change targets is reiterated through

the Scottish Energy Statement (Scottish Government, 2020c) and Offshore Wind Policy Statement (Scottish Government, 2020d), which outline the approach to a low-carbon energy future, including the strategic importance of offshore wind in meeting Scotland's climate targets.

3.2.1.4 Scotland's carbon budget framework is established under the Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Acts of 2019 and 2024, and guided by the Update to the Climate Change Plan 2018–2032 (2020). These commitments set a legally binding target of net zero emissions by 2045, with proposed carbon budgets—aligned to Climate Change Committee advice—requiring reductions from 1990 levels of 57% for 2026–2030, 69% for 2031–2035, 80% for 2036–2040, and 94% for 2041–2045. The Scottish Government's ambition is reinforced through the Climate Change Plan update, the 2019 climate emergency declaration, and strategic investments such as £1.6 billion for heat decarbonisation and the £100 million Green Jobs Fund.

3.2.1.5 The Carbon Budget and Growth Delivery Plan (UK Government, 2025), published in October 2025, sets out the UK Government's carbon budget commitments. The October 2025 publication introduces 'carbon budgets' which are five-year caps on emissions intended to keep the UK on a pathway to achieving the 2050 net zero target. It is expected that Scotland will contribute to the UK's overall carbon budget strategy through its climate policies.

3.2.1.6 Offshore wind is also identified as one of the frontier industries within the clean energy growth driving sector of the UK Modern Industrial Strategy 2025 (UK Government, 2025). The value of this industry in helping achieve climate change targets is indisputable and justifies the need for projects such as MarramWind Offshore Wind Farm in addressing net zero emissions and climate ambitions.

3.2.1.7 NPF4 guidance: Policy 2 – climate mitigation and adaptation (Scottish Government, 2025), published in June 2025 highlights that Scotland is halfway to achieving its 2045 net zero target for all GHG emissions. The delivery of up to 3GW of renewable energy by the Project will make a significant contribution to closing this gap, directly supporting the achievement of Scotland's ambitious climate change and carbon budget objectives.

3.3 Energy policy

3.3.1 United Kingdom

3.3.1.1 The increasing urgency of climate change and the need for a secure, resilient energy supply have driven the development of robust legislation and policy frameworks to accelerate renewable energy deployment. The strategic policy context against which the Project will be delivered demonstrates a clear and pressing need for large-scale offshore wind development.

3.3.1.2 The overarching framework for energy planning, including support for renewable energy development, is set out within the UK Marine Policy Statement (HM Government, 2011) and bolstered by National Policy Statement (NPS) for Energy (EN-1) (Department for Energy Security & Net Zero, 2023) and the Offshore Wind Sector Deal (HM Government, 2017). These documents collectively highlight the urgent need for low-carbon energy infrastructure, such as offshore wind, to achieve the UK's net zero targets.

3.3.1.3 NESO's HND, HND Follow-up Exercise (FUE) and Beyond 2030 publications form the strategic context for integrating offshore wind into the energy system. The HND FUE builds upon the original HND's coordinated vision for offshore transmission infrastructure to

support the UK's 2030 target of 50GW offshore wind capacity, by refining and expanding on the design to accommodate additional projects, updated data and stakeholder feedback.

3.3.1.4 In March 2024, NESO published the 'Beyond 2030' report, which suggests network recommendations throughout the 2030s, including a £58 billion direct investment for offshore and onshore network upgrades. The report assesses potential solutions against four design objectives including: cost; deliverability; impact on the natural environment; and impact on the local community. As discussed in **paragraph 2.2.1.6** the report identified the location for the full 3GW connection as being within the vicinity of Peterhead and SSEN subsequently confirmed the Project's connection point as the Netherton Hub at Longside near Peterhead, which was subsequently granted PPiP by Aberdeenshire Council in August 2025.

3.3.1.5 The HND implementation plan and its suite of associated assessments have been published to support the delivery of the HND and HND FUE. These documents provide a high-level evaluation of the cumulative environmental impacts of proposed offshore transmission corridors, landfall sites, and related infrastructure. The UK Government's Clean Power 2030 Action Plan (UK Government, 2024) sets ambitious targets of 43 – 50GW of offshore wind by 2030, reiterating the urgent need for investment and rapid deployment in the sector. Importantly, the Action Plan also sets a further target of 72 – 89GW of offshore wind capacity by 2035, reflecting the UK's UK Government's policy position of offshore wind becoming the backbone of the electricity system to achieve net zero. This longer-term target is particularly relevant to the Project given the anticipated construction programme and operational timeline of approximately 35 years for each Project phase. The justification for offshore wind developments, such as MarramWind, is therefore clearly set out within UK energy policy, both for 2030 and 2035, supporting the case for strategic-scale renewables as essential national infrastructure.

3.3.2 Scotland

3.3.2.1 Whilst the energy market is a reserved policy area, the Scottish Government has also developed a suite of energy policies which are of direct relevance to the Project:

- The Electricity Generation Policy Statement 2013 (Scottish Government, 2013);
- Scottish Energy Strategy 2017: The Future of Energy in Scotland (Scottish Government, 2017);
- Sectoral Marine Plan for Offshore Wind Energy 2020 (Scottish Government, 2020a);
- Offshore Wind Policy Statement 2020 and Consultation (Scottish Government, 2020d);
- Draft Updated Offshore Wind Ambition Consultation (2025);
- Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023a); and
- Draft Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2025b).

3.3.2.2 The Applicant provided a response to the Scottish Government's consultation on the Updated Offshore Wind Ambition which recognised the importance and implications of the update. The Applicant broadly welcomes the scale of the Scottish Government's proposed new offshore wind ambition and believes that this updated target, expected before the end of 2025, could help strengthen Scotland's current offshore wind development pipeline beyond 2030. The proposed deployment of at least 40GW of new offshore wind capacity by 2035 - 2040 and aim to maximise deployment before the end of Scotland's second Carbon Budget period in 2035 is supported.

3.3.2.3 The national need for the Project is further established through Policy 11 of NPF4 which states plainly that "*development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported*". The identification of strategic-scale renewables, such as offshore wind, as a national development emphasises the significance of the Project in helping achieve energy policy goals.

3.3.2.4 With the Scottish Government's Updated Offshore Wind Policy Statement (Scottish Government, 2025) setting out an aim of 40GW of new offshore wind capacity by 2035 - 2040, there is a clear and urgent demand for the Project.

3.3.2.5 By producing local, clean renewable energy, the Project will enhance energy security for Scotland and the wider UK, reducing reliance on imported and polluting hydrocarbons. This not only supports decarbonisation but also helps insulate Scotland and the UK from the risks associated with increasingly unstable global politics and supply chain.

3.4 The benefits and need of the development

3.4.1 Project objectives

3.4.1.1 A series of project-wide objectives have been developed to help ensure the development achieves specific goals. The Project objectives are:

- **Objective 1:** To export a significant volume of renewable electricity to the National Grid in support of UK and Scottish Government targets, ambitions and commitments for net zero emissions and offshore wind generation. This includes making an important contribution to the achievement of the Scottish Government's updated offshore wind ambition of 40GW of new deployment by 2035 - 2040.
- **Objective 2:** To increase security of supply for Scottish and UK consumers by being one of the largest Floating Offshore Wind (FLOW) projects in Scottish waters.
- **Objective 3:** To support the realisation of Scotland's deep-water potential and maximise use of the available seabed in synergy with other users.
- **Objective 4:** To support and secure the development of the Scottish supply chain by being one of the largest FLOW projects in Scottish waters, providing continuity and security for supply chain development.
- **Objective 5:** To drive technological innovation with the aim of lowering the costs to Scottish and UK consumers.
- **Objective 6:** To support socio-economic growth in Scotland and contribute to achieving a Just Transition.

3.4.1.2 The following sections discuss how the Project responds to each of the Project objectives.

3.4.2 Objective 1

3.4.2.1 Floating offshore wind is essential to achieving the UK and Scotland's legally binding net zero targets - 2045 for Scotland and 2050 for the UK. The Project will generate up to 3GW of renewable electricity, significantly displacing carbon-intensive generation and contributing to long-term decarbonisation.

3.4.2.2 The Project will play a critical role in sustaining emissions reductions beyond 2030. It also supports Scotland's ambition for 40GW of offshore wind deployment by 2035 - 2040, helping to meet future energy demand with clean, homegrown power.

3.4.2.3 As set out within **Volume 1, Chapter 29: Greenhouse Gases** of the accompanying EIA Report, the electricity generation from the Project is expected to provide a net benefit in supporting ongoing efforts to decarbonise generation on the UK national electricity network. Moreover, the displaced GHG emissions across the Project's operational lifetime are greater than the reported emissions in its construction, O&M and decommissioning, demonstrating the positive impacts expected to emerge from the Project.

3.4.2.4 The Project as a whole would help to meet net zero goals and renewable energy targets, with an installed capacity of up to 3GW and ability to produce low carbon electricity during its operation. This would help to ensure the UK Government meets its legal requirement to achieve net zero by 2050 and help the Scottish Government hit its legal requirement to achieve net zero by 2045.

3.4.2.5 Given the significant contribution of renewable electricity generation by the Project over its lifetime, it is expected to offset its lifecycle emissions after 7.5 years of its operational life, with a carbon savings of 1,614,670 tCO_2e/year, as noted in **Volume 1, Chapter 29: Greenhouse Gases**. The Project will continue to offset GHG emissions throughout is operational life and therefore make a positive contribution to the UK Government's target to reach net zero emission in 2050.

3.4.3 Objective 2

3.4.3.1 By generating 3GW of homegrown electricity, the Project will reduce reliance on imported fossil fuels and enhance the UK's energy independence. This will help insulate consumers from global energy price volatility and geopolitical instability, which have disrupted energy markets in recent years.

3.4.3.2 A more resilient and diversified domestic energy mix will reduce exposure to external shocks and contribute to long-term affordability and stability for consumers.

3.4.3.3 The Project would further aid Scotland and the wider UK to ensure it has energy security, producing local, clean, renewable energy that is not contingent upon importing and processing polluting hydrocarbons in order to produce electricity. This further helps to secure Scotland and the UK from an increasingly unstable global politics and supply chains.

3.4.4 Objective 3

3.4.4.1 Scotland's deeper offshore waters offer some of the strongest and most consistent wind resources in Europe but are inaccessible to fixed-bottom turbines. The Project will unlock this potential through floating technology, enabling large-scale clean energy generation in areas previously undevelopable.

3.4.4.2 By locating further offshore, the Project makes efficient use of limited seabed and benefits from higher wind speeds, resulting in more reliable and higher-yield electricity generation. This translates to a higher capacity factor and reduced intermittency compared to near-shore sites.

3.4.5 Objective 4

3.4.5.1 The Project's phased construction over a 12 year period will provide long-term certainty to the Scottish offshore wind supply chain. As one of the largest floating wind projects in development, it will anchor investment, stimulate innovation, and create sustained demand for local manufacturing, fabrication, and services. This continuity will help build a globally competitive supply chain and support the growth of a green industrial base in Scotland.

3.4.6 Objective 5

3.4.6.1 The Project will deploy floating wind technology at commercial scale, moving beyond pilot projects to full-scale infrastructure. With the aim of driving down costs through economies of scale and technical innovation, this Project will accelerate learning and help position the UK as a global leader in floating offshore wind.

3.4.6.2 Scotland has an early mover advantage through projects like Hywind and Kincardine, and leasing rounds such as ScotWind and Innovation and Targeted Oil and Gas (INTOG). The Project will build on this foundation to further advance floating wind technology and cement the UK's leadership in this emerging sector.

3.4.7 Objective 6

3.4.7.1 Facilitating socio-economic development is a key ambition in Scotland's Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023a), which aims to maintain or increase employment as the sector moves from high carbon to low carbon energy generating technologies, such as floating wind.

3.4.7.2 The Project will facilitate socio-economic development by generating new low-carbon jobs, increasing opportunities for Scottish suppliers and helping to develop the future offshore workforce, skills and employability.

3.4.7.3 Given the scale of the Project and the 12 year phased construction stage, the socio-economic benefit is expected to be wide reaching.

3.4.7.4 The Project seeks to deliver positive outcomes for the environment and local communities that extend beyond its contribution to net zero. Community engagement will be central to this approach, with ongoing dialogue informing how benefits are delivered locally. This includes supporting rural economies, tourism, and nature-based initiatives where appropriate, and ensuring that any commitments are grounded in practical feasibility and stakeholder input. This objective reflects the Project's broader ambition to embed social value into the Project's development and delivery.

3.4.7.5 As detailed in **Volume 1, Chapter 30: Socio-economics** of the accompanying **EIA Report**, the Project is committed to utilising the local workforce and suppliers where possible and would create an average of 1,250 jobs across construction and operational roles.

3.4.7.6 Offshore wind is identified as an important source of investment within the Aberdeenshire region, with £22 billion of energy-related investment expected within the region over the next decade (Peterhead Energy Transition Forum, 2025).

3.4.7.7 The Applicant has developed a Socio-Economic Action Plan (SEAP) for the MarramWind Offshore Wind Farm. The SEAP sets out the measures to harness the local and regional opportunities and maximise the social and economic performance of the Project. It provides an overview of the key demographic, economic, and social indicators that were used to inform its development.

3.4.7.8 The SEAP also provides a policy review and an assessment of the supply chain capabilities in Scotland, with a particular focus on the regional study area of the Northeast (Aberdeen City, Aberdeenshire, Moray and Highlands). It concludes with a series of recommendations intended to assist the Applicant in achieving the Project objectives.

3.4.7.9 The SEAP identified the following future baseline challenges:

- **Challenge 1**: The demographic trends identified could pose challenges for workforce availability and productivity.

- **Challenge 2**: Despite strong migration inflows, Aberdeenshire attracts relatively few working age migrants, posing potential workforce retention challenges.
- **Challenge 3**: The regional study area experiences notable deprivation in access to services, crime, housing affordability, and education. Concentrations of deprivation are most pronounced in Peterhead and Fraserburgh, where multiple forms of deprivation, including income, education, and crime are coincide with challenges regarding transport connectivity.
- **Challenge 4**: Local trends in qualification attainment may present barriers to accessing high-skilled roles in offshore renewables locally, highlighting the importance of targeted skills and training initiatives, specifically in industries and courses that will help address skills shortages in the sector.
- **Challenge 5**: Limited or no work experience presents a key barrier to employment across Scotland, and employment retention rates in the regional study area are below the national average.
- **Challenge 6**: Workforce may require reskilling and adaptation to meet specific demands of offshore wind.
- **Challenge 7**: Housing deprivation indicated by potential challenges in availability of rented tenure properties and slower local house price growth compared to the national average.
- **Challenge 8**: Larger firms dominate engineering, consultancy and legal contracts, while subject matter experts (SMEs) are mainly active in specialist environmental survey work. SMEs typically deliver smaller contracts (<£1m) or act as subcontractors to larger firms and consultancies.
- **Challenge 9**: Scotland lacks serial production facilities, has a fragmented supply chain, and ports are privatised. Within the regional study area, SMEs are primarily active in mooring systems, while cable manufacturing is dominated by larger firms.

3.4.7.10 The SEAP identified the following future baseline opportunities:

- **Opportunity 1**: Foundation to develop a growing skilled workforce pipeline for the renewables and related industries supply chain.
- **Opportunity 2**: Foundation to target employability interventions and support to improve job retention in renewables and related industries.
- **Opportunity 3**: Evidence of a strong and engaged workforce with favourable labour market conditions locally.
- **Opportunity 4**: The local employment base is aligned with sectors associated with renewables and related industries.
- **Opportunity 5**: Evidence of a dispersed local labour market from which the renewables industry can draw to create local employment opportunities.
- **Opportunity 6**: The regional study area benefits from existing infrastructure, and a robust skills ecosystem with key assets including educational institutions and skills partnerships.
- **Opportunity 7**: The regional study area has considerable expertise in development and project management, with a number of established suppliers.
- **Opportunity 8**: Scotland has strong expertise in installation and commissioning, particularly in offshore logistics, heavy-lift operations, subsea engineering, and port

services. Larger contractors deliver major contracts, while specialist SMEs provide niche services within wider installation packages.

- **Opportunity 9**: Scotland has strong O&M capabilities, particularly in the regional study area around Aberdeen, leveraging the established oil and gas supply chain. Ports are a key enabler for O&M, with most suitable construction and operational ports located in the regional study area.

3.4.7.11 The SEAP identified the following future baseline challenges: The SEAP sets out the actions the applicant will undertake at key points in the Project's lifecycle, to help businesses and communities in the region realise opportunities and leverage value from the development, construction and operations of the Project's onshore and offshore infrastructure. These actions have been grouped into four main themes as follows:

- **Supporting the Supply Chain:** Actions that will help create greater capability, capacity and awareness of offshore wind opportunities within supply chain companies, including a commitment to allocating £500,000 from the Project's Offshore Wind Stimulus Fund to support upskilling, innovation and business growth for supply chain companies in the region.
- **Promoting Fair Employment:** Actions to support fair employment generated by the Project, including a commitment to offer guaranteed interviews to people local to the wind farm's operational base who meet minimum job requirements.
- **Providing Skills and Training:** Actions to support the provision of training and skills development relevant to offshore wind that include a commitment to working with regional education partners to support apprenticeships and / or work experience placements associated with the Project's construction and operation.
- **Supporting and Enhancing Communities:** Actions to support community wealth building priorities and community-led projects, which include a commitment to establishing a community benefit fund around the time the Project becomes operational.

3.4.7.12 The SEAP actions and commitments are iterative in nature and will be subject to further development and refinement as the Project progresses, including the incorporation of Key Performance Indicators (KPIs). The Applicant will continue to engage with local, regional and national partners to inform the development and delivery of the actions within the SEAP, which will be updated at regular intervals. The Applicant will also report on progress being made towards the delivery of the SEAP actions and commitments at regular intervals.

3.4.7.13 The Project will generate additional economic activity from expenditure along with increased employment. The Gross Value Added (GVA) in an economy can be seen as the difference between revenues and costs for firms. Firms vary in their use of resources and labour but on average approximately 60% of GVA is made up of "compensation of employees", which includes salaries and costs to employers such as national insurance (ONS, 2025b). As such, the proportionate effects on employment are a close proxy for the effects on GVA.

3.4.7.14 There is a wide range in the estimates published in relation to projections of GVA in the clean energy and offshore wind sector. On a per full-time equivalents (FTE) basis, a recent industry report for Scottish Renewables (2025) identifies that 41,500 FTE jobs in the offshore wind sector would lead to GVA of £1.4bn in 2032 at the expected peak of construction, giving a ratio of £33,810/FTE (in 2025 prices). Alternatively, the Department for Energy Security and Net Zero (DESNZ) has estimated an average value of GVA for offshore wind of £103,000/FTE (in 2025 prices). Estimates depend on assumptions over activities undertaken in Scotland, the composition of skills requirements and salary levels. Estimates based on the construction expenditure in the Supply Chain Development Statement (SCDS) for the Project are approximately £140,000/FTE but, given potential

uncertainties, the lower average calculated by DESNZ has been used by the Applicant to reflect a more conservative approach.

3.4.7.15 The GVA from operations is related to more specific activities with greater certainty and has a greater proportion of expenditure related to employment. An estimate of £93,000/FTE is used which is calculated from the SCDS and industry estimates from the Applicant.

3.4.7.16 The level of GVA in Scotland generated by the Project calculated using the SCDS values and related employment projections is an average of £121.2m annually over the construction period and continues at £99.0m annually during the operational period.

3.4.7.17 The effects from these monetary flows are reflected in the economic context in multiple ways, from local spending to greater local tax receipts and greater activity supporting local businesses.

3.4.7.18 The Peterhead Energy Transition Forum (PETF) (Peterhead Port Authority, 2025) recognises that development of the onshore elements of the Project would help to increase economic activity within the area, whilst also enabling the use of clean, renewable energy. The Project as a whole is well-sited to deliver wide ranging economic benefits and to capitalise on being located near to Peterhead, which is a growing and identifiable hub for offshore wind logistics and operations for the Scottish North Sea, including the MarramWind OAA.

4. Consultation and Engagement

4.1 Introduction

4.1.1.1 This Section provides a summary of the pre-application consultation undertaken with local communities. A detailed account of the consultation process is provided in the accompanying Pre-Application Consultation (PAC) Report.

4.1.1.2 The Applicant has undertaken both statutory pre-application consultation, in accordance with the Town and Country Planning (Scotland) Act 1997, the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, and the Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021, and wider stakeholder engagement to ensure meaningful dialogue with affected communities and interested parties throughout the development process.

4.2 Legislative requirements for consultation

4.2.1.1 Given the national development status afforded to the Project and the extended period required to bring forward a project of this scale, four rounds of statutory consultation have been held. The requirements of the relevant regulations have been addressed by the Applicant during the pre-application consultation process and are detailed within the **Pre-Application Consultation (PAC) Report**.

4.2.1.2 The Council provided a Pre-Application Advice Report in December 2024 acknowledging the Applicant's intention to submit an application for PPiP and advising on the key issues to be addressed, stakeholder groups for engagement and policy requirements against which the proposed onshore infrastructure of the Project would be assessed.

4.3 Consultation events

4.3.1.1 The pre-application process was planned to include two rounds of statutory consultation. As the 18-month timeframe from Proposal of Application Notice to planning application lapsed, a new notice was submitted, and two further rounds of statutory consultation were held. Feedback received from all four consultation periods has informed the design of the Project and the preparation of the consenting applications.

4.3.1.2 **Table 4.1** below outlines the timings of consultation rounds and events. At each consultation event, representatives for the Applicant were present to explain the proposals and answer any questions from attendees.

Table 4.1 Statutory consultation events

Date	Time	Event	Location
Statutory Consultation: 1st Round (27 May – 1 July 2024)			
30 May	18:00 – 19:00	Q&A event	Online
6 June	13:00 – 19:00	Public drop-in and VIP hour	Palace Hotel, Princes Street, Peterhead
7 June	13:00 – 19:00	Public drop-in and VIP hour	Longside Parish Hall, Peterhead
26 June	18:00 – 19:00	Q&A event	Online
Statutory Consultation: 2nd Round (9 October – 19 November 2024)			
7 October	18:00 – 19:00	Q&A event	Online
29 October	13:00 – 19:00	Public drop-in and VIP hour	Palace Hotel, Princes Street, Peterhead
30 October	13:00 – 19:00	Public drop-in and VIP hour	Longside Football Club
7 November	18:00 – 19:00	Q&A event	Online
Statutory Consultation: 3rd Round (18 August – 9 September 2025)			
27 August	14:00 – 19:00	Public drop-in session	Palace Hotel, Prince St, Peterhead
Statutory Consultation: 4th Round (30 October – 13 November 2025)			
3 November	14:00 – 19:00	Public drop-in session	Longside Football Club

4.3.2 Onshore Statutory Consultation feedback

4.3.2.1 As detailed within the **PAC Report**, the statutory consultation approach for the Project has been applied covering both onshore and offshore considerations and associated statutory consenting requirements. All feedback has been analysed and organised into themes to provide a logical overview of responses and how they relate to the project. **Table 4.2** outlines relevant onshore feedback that has been shared throughout the four rounds of consultation. Statutory consultation covered both onshore and offshore considerations and associated statutory consenting requirements.

4.3.2.2 A total of 40 feedback forms or emails with written feedback were received during the consultation periods. 26 were received during the first consultation, six during the second, three during the third and five during the fourth consultation.

4.3.2.3 Feedback from consultees was analysed using quantitative analysis of the questionnaire responses, which are presented in the **PAC Report** as figures or tables. The open responses and emails required further analysis through a process called coding to identify common themes. A code frame was created by reviewing a sample of the responses received and identifying a set of common themes and areas of comment. Each theme was given a unique code made up of an alphabetical reference and a general topic covered.

4.3.2.4 Feedback provided during all rounds of statutory consultation covered a wide range of subject matters in relation to onshore planning. **Table 4.2** summarises key feedback across all four rounds of consultation and how these issues have been addressed.

Table 4.2 Stakeholder feedback summary (onshore)

Theme	Feedback	Applicant response
Onshore water environment	Concern about damage to drinking water from wells.	Information from water supply owners has been taken into consideration during the site selection process to help minimise any potential effects. The Project will also comply with industry good practice for pollution.
	Concern about field drainage and damage to water courses.	Care will be taken to ensure that existing field drainage regimes are not compromised by the Project, and field drainage systems will be maintained during construction and reinstated on completion.
Traffic and transport	Various views for and against Substation option D from a traffic and access perspective.	Substation option D was discounted after Statutory Consultation 1, with options B and C instead identified as potential sites at Statutory Consultation 2 to accommodate the onshore substations. Sites B and C are both accessible and able to accommodate the construction traffic. Both sites are located in proximity to the A90 which forms part of the trunk road network. The location of the sites will support an access strategy which promotes access from the east to minimise the temporary effect of construction traffic on local communities including Blackhills.
	Concern about the inconvenience caused by construction.	A detailed Construction Traffic Management Plan (CTMP) will be prepared in consultation with Aberdeenshire Council, with this supporting the implementation of measures to mitigate the temporary effects from construction traffic, particularly during the morning and evening peak periods. At this stage an Outline CTMP has been prepared to support the application.
Noise effects	Concern about the noise impact on local house prices and quality of life.	A noise and vibration assessment has been prepared as part of the accompany EIA Report. It considers the potential noise and vibration effects associated with the construction and operational stages of the Project. Noise limits will be agreed with Aberdeenshire Council. The Project would be required to meet these noise limits and, where necessary, appropriate mitigation measures will be implemented to ensure these limits are met.
Climate	Concern that developers have no interest in reducing climate change and are only interested in making money for themselves and their investors.	the Applicant is committed to tackling climate change and has set a target to become a net-zero emissions energy business by 2040. The Project is expected to generate enough electricity to power the equivalent of more than 3.5 million homes. This will support the UK's drive for energy security and green energy independence.
	Scepticism about impact on earth's	Carbon emissions in the atmosphere have a global effect. Although when viewed on a global scale the benefits of individual projects

Theme	Feedback	Applicant response
	climate and the amount of money being spent to meet Net Zero targets.	may appear minor, the renewable energy produced by the windfarm will support the reduction in carbon intensity of UK energy and therefore will support UK and global efforts to reduce CO_2 emissions.
Construction	Request that construction methods and installation should limit disruption during construction.	The Applicant understands the importance of minimising disruption during the construction stage. The Applicant is committed to reducing potential effects on the local community and environment. This includes: • careful planning and scheduling; • use of modern construction techniques; and • effective communication and engagement.
	Concern about the number of companies involved in the development.	The Applicant understands the concerns raised about the number of companies involved. A plan is in place to coordinate the various contractors during the construction stage, and to ensure compliance with relevant regulations and legislation for construction, design and management. The Applicant will implement a robust Project Management System to oversee all aspects of construction. This system will ensure clear communication, coordination, and scheduling among all contractors, minimising disruption and ensuring the efficient and timely completion of the onshore infrastructure. We are committed to engaging with stakeholders throughout the construction process, providing regular updates and addressing concerns as they arise.
	Suggestion that the public should have been presented with a completed plan during early rounds of consultation.	A final project design was presented to stakeholders during Statutory Consultation 4, prior to submitting applications to Aberdeenshire Council and MD-LOT, respectively. Presenting a completed project plan during earlier rounds of consultation would have limited how much of our design stakeholders could influence.
Brownfield sites	A suggestion to use brownfield sites for the infrastructure, rather than the countryside.	The use of brownfield sites was carefully considered during the site selection process. As part of our site selection assessment, we evaluated various factors, including environmental effects and technical feasibility. While no suitable brownfield sites were identified, the Applicant remains committed to minimising the footprint of the onshore substation and implementing measures to mitigate environmental effects.
Landfall	Concern that local villages will be cut off from the coast due to the landfall infrastructure.	The landfall and onshore export cable infrastructure will below ground with construction areas reinstated following completion. Consequently, infrastructure should not restrict access or cut off the coast from local villages, during construction or operation.
	Suggestion to use horizontal directional drilling (HDD) be used.	A trenchless solution (such as HDD or similar trenchless technique) is to be implemented for the installation of export cable ducts at the landfall.

Theme	Feedback	Applicant response
Landscape and visual	Concerned about the effect of the proposed infrastructure on the landscapes, communities, tourism, agriculture and forestry.	The process of site selection for the Project's onshore infrastructure has aimed to identify the shortest feasible onshore export cable route and to minimise environmental and amenity impacts. This has included the avoidance of key sensitive features where possible and the identification and implementation of appropriate mitigation measures where avoidance is not feasible. The Applicant has considered stakeholder feedback obtained through Statutory Consultation and wider stakeholder engagement, and this has fed into site selection.

4.3.3 Consultation feedback in project development

4.3.3.1 The insights gathered through these consultations have informed design refinements and mitigation strategies, ensuring alignment with stakeholder expectations and regulatory requirements.

Statutory consultation 1

Landfall

4.3.3.2 Stakeholders raised concerns regarding the impact of the landfall on the seascape, landscape and visual considerations, environmental protection, construction methods and installation and intertidal wildlife.

4.3.3.3 Taking into consideration stakeholder feedback and the results of environmental and technical assessments, Sandford Bay was discounted as a landfall option and the onshore and offshore export cable routing associated with Sandford Bay removed.

Onshore substation site locations

4.3.3.4 In relation to onshore substation site locations, landscape and visual considerations were of greatest importance to respondents. Environmental protection, onshore wildlife and construction methods were also notably important to consultees. Respondents also raised concerns about the effect of construction, including impact of traffic and transport.

4.3.3.5 Some consultees expressed a preference for onshore substation site Option D due to remote location, limited visual impact and low impact on surrounding communities.

4.3.3.6 Concerns were raised about onshore substation site Option A due to its proximity to Longside.

4.3.3.7 Despite some endorsement of Option D, assessments indicated that this site would carry the greatest environmental, landscape and visual impact; all aspects considered important to stakeholders.

4.3.3.8 Onshore substation site Options B and C offered advantages for construction methods and transport with good access for construction traffic.

4.3.3.9 Consequently, sites A, D and E were discounted. Onshore substation site Options B and C were therefore retained for consideration.

Statutory consultation 2

Onshore substation site locations

4.3.3.10 Respondents indicated concern about the visual impact on local landscapes and communities, the strain on local infrastructure and the impact on traffic and transport.

4.3.3.11 Onshore substation site Option B reduces proximity to residential properties, minimising visual impact on residents. The site offers good potential for screening. The site performs well from a technical and environmental perspective. Neighbouring land is already in industrial use so would provide a more coherent semi-industrial setting.

4.3.3.12 Consequently, onshore substation site Option B was selected as the preferred location.

Onshore export cable corridor

4.3.3.13 Stakeholder feedback indicated that traffic and transport, landscape and visual effects were of greatest concern.

4.3.3.14 The primary onshore export corridor to the east of Longside airfield would reduce traffic impact and the need for disturbance on local roads due to proximity to A90.

4.3.3.15 The eastern route would generally run closer to more industrial areas. The route is shorter and less visible from the Formartine and Buchan Way Core Path.

4.3.3.16 Technical and environmental considerations also supported discounting the alternative, western onshore export cable corridor.

Statutory consultation 3

Onshore substation site

4.3.3.17 Respondents to consultation raised concerns that the scale of the infrastructure will damage the landscape.

4.3.3.18 In line with the decision to select onshore substation site Option B as the preferred location following Statutory Consultation 2, Option B was selected as the proposed substation site location. This site is considered to align best with concerns raised by consultation respondents.

4.3.3.19 The more industrial setting of Option B minimises proximity to residential properties and lends itself to screening to reduce landscape and visual effects. This will help integrate the substation into the surrounding environment and enhance local biodiversity.

Statutory consultation 4

Landfall location

4.3.3.20 Consultation respondents raised concerns about the concentration of multiple developments using the same landfall and its effect on the local area and rendering the beach unusable for beach users.

4.3.3.21 Considering feedback from beach users, alongside technical reports, the decision has been made that landfall export cable infrastructure will be installed below ground using HDD (or similar trenchless technique). The export cable entry point would be located within a fenced off, temporary construction compound, and the export cable exit point would be on the

seabed a short distance from shore. Consequently, it is not envisaged that onshore / landfall infrastructure, either during construction or for the operational phase, will restrict access or cut off access to the coast.

4.3.4 Pre-consultation engagement

4.3.4.1 In 2023, the Applicant held a pre-consultation engagement Scoping Opinion consultation and Drop-In Day. This non-statutory event included an introductory hour for stakeholders followed by a public drop-in session. The aim was to introduce the project to the local community and gather initial feedback ahead of Statutory Consultations.

4.3.5 Engagement with community councils

4.3.5.1 For all rounds of Statutory Consultation letters and follow-up emails detailing the project and consultation and a copy of the Proposal of Application Notices, with an offer of a meeting, were issued to all affected and neighbouring Community Councils:

- Boddam Community Council;
- Buchan East Community Council;
- Longside Community Council;
- Peterhead Community Council;
- Cruden Community Council;
- Deer Community Council;
- Mintlaw and District Community Council;
- New Pitsligo Community Council;
- Strichen Community Council;
- Rathen, Memsie and Cortes Community Council; and
- Invercairn Community Council.

4.4 Summary

4.4.1.1 The Applicant has undertaken a comprehensive programme of consultation and engagement to ensure that communities and stakeholders with an interest in the Project are well-informed about the emerging development proposals and have had meaningful opportunities to share their views.

4.4.1.2 Details of all community engagement activities, along with supporting evidence, is provided in the accompanying **PAC Report**, in accordance with relevant legislative requirements. The Applicant remains committed to ongoing stakeholder engagement throughout the planning application process and across the construction, operational, and decommissioning phases of the Project, to promote open communication and collaborative working.

5. Legislation and Policy Context

5.1 Introduction

5.1.1.1 This section of the Planning Statement provides an overview of the legislative context and relevant planning policy documents, their status and purpose, summarising the framework against which the onshore infrastructure will be delivered. A comprehensive review of the legislative and policy context applicable to the Project is provided in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1** of the **EIA Report**.

5.1.1.2 As per Section 25 of the Town and Country Planning (Scotland) Act 1997, as amended any determination needs to be made in accordance with the statutory development plan unless material considerations indicate otherwise.

5.1.1.3 The statutory Development Plan relevant to proposals within the Aberdeenshire Council local authority area comprises the following:

- National Planning Framework 4 (NPF4) (Scottish Government, 2023); and
- Aberdeenshire Council Local Development Plan (Aberdeenshire Council, 2023).

5.1.1.4 Regard has been had to both policy documents when assessing the impacts and acceptability of the Project as detailed in **Section 6**, below, where the relevant planning policies have been outlined.

5.1.1.5 In addition, the UK Government's National Policy Statements and Planning Advice Notes published by the Scottish Government form the material considerations against which the Project will be assessed.

5.2 The Development Plan

5.2.1 National Planning Framework 4 (NPF4)

5.2.1.1 NPF4 was adopted by the Scottish Government on 13 February 2023 and sets out the national spatial strategy for Scotland to 2045. NPF4 sets out Scotland's spatial principles, regional priorities, national developments, and national planning policy. The NPF4 replaces the previous NPF3, Scottish Planning Policy documents and Strategic Development Plans.

5.2.1.2 NPF4 brings together the long-term spatial strategy with national planning policies as part of the statutory Development Plan. NPF4 contains six overarching spatial principles that are key in achieving the goal of sustainable, liveable and productive places, including:

- just transition;
- conserving and recycling assets;
- local living;
- compact urban growth;
- rebalanced development; and
- rural revitalisation.

5.2.1.3 The policy sets out specific advice for individual policies in NPF4, including renewable energy and climate mitigation. NPF4 policies considered of greatest relevance to the onshore elements of the Project are detailed in **Volume 3, Appendix 2.1** of the **EIA Report**, and are set out briefly below:

- Policy 1: Tackling the climate and nature crises;
- Policy 2: Climate mitigation and adaptation;
- 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 12: Zero waste;
- Policy 13: Sustainable transport;
- Policy 14: Design, quality and place;
- Policy 18: Infrastructure first;
- Policy 20: Blue and green infrastructure;
- Policy 22: Flood risk and water management;
- Policy 23: Health and safety; and
- Policy 29: Rural development.

5.2.1.4 The NPF4 sets out a high-level strategy for development in Scotland for the plan period. The Project falls under the Strategic Renewable Electricity Generation and Transmission Infrastructure National Development within the NPF4, confirming its national significance and the importance of aligning with the aforementioned policies. Policies 1 (Tackling the climate and nature crises) and 11 (Energy) are of particular significance as detailed in **Volume 3, Appendix 2.1** of the **EIA Report**.

5.2.1.5 The Scottish Government are currently preparing guidance documents related to specific NPF4 policies, in order to clarify expectations and assist in the policies' interpretation. It is intended that the guidance documents help to standardise the decision-making process and reduce uncertainty for applicants. Whilst the Scottish Government continues their work in preparing these guidance documents, the Policy 2 - climate mitigation and adaptation (Scottish Government, 2025) publication which was published in June 2025 is of relevance to the Project, as noted below.

NPF4 planning guidance: Policy 2 - Climate Mitigation and Adaptation

5.2.1.6 In June 2025, the Scottish Government published NPF4 guidance: Policy 2 - climate mitigation and adaptation (Scottish Government, 2025a), supporting the consistent, proportionate and effective application of NPF4 Policy 2.

5.2.1.7 The publication aims to support Scotland's transition to net-zero emissions by 2045 and build resilience to climate change by providing applicants and developers with additional guidance on how to evidence their proposals' compliance with climate mitigation and adaptation goals.

5.2.1.8 The accompanying EIA Report demonstrates the proportionate ways in which the Project will contribute to Scotland's climate change targets and therefore align with Policy 2 of the NPF4.

5.2.2 Aberdeenshire Local Development Plan (2023)

5.2.2.1 The Aberdeenshire Council's Local Development Plan (LDP) (2023) was recently adopted by Aberdeenshire Council on 13 January 2023. It is acknowledged that Supplementary Guidance is actively integrated into the Aberdeenshire Council's LDP 2023, rather than acting as standalone documentation. The LDP 2023 has been written to be consistent with the Aberdeen City and Shire Strategic Development Plan 2020.

5.2.2.2 As the LDP was adopted in 2023, it was prepared using the existing planning legislation. Transitional arrangements have been announced by the Scottish Government to manage the changeover from current to new-style LDPs. The next Local Development Plan will be prepared on a timetable that will see its adoption in or before 2029.

5.2.2.3 The Aberdeenshire Council's LDP (2023) policies considered relevant to the onshore infrastructure include:

- Policy R1: Special Rural Areas;
- Policy R2: Development Proposals Elsewhere in the Countryside;
- Policy P1: Layout, Siting and Design;
- Policy E1: Natural Heritage;
- Policy E2: Landscape;
- Policy E3: Forestry and Woodland;
- Policy HE1: Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings);
- Policy PR1: Protecting Important Resources;
- Policy C4: Flooding; and
- Policy RD1: Providing Suitable Services.

5.3 Other material considerations

5.3.1 Planning Advice Notes (PANs)

5.3.1.1 NPF4 (2023) is supported at a national level by planning guidance documents prepared by the Scottish Government, including Planning Advice Notes (PANs) and Circulars. These documents are considered material for decision making, and provide advice on good practice, technical information and the implementation of legislative and procedural change, however, do not form part of the statutory Development Plan.

5.3.1.2 The following PANs and Circulars may be relevant to the onshore infrastructure design:

National Planning guidance

- Planning Advice Note 60: Planning for Natural Heritage (2000);
- Planning Advice Note 61: Sustainable Urban Drainage Systems (2001);
- Planning Advice Note 68: Design Statements (2003);
- Planning Advice Note 75: Planning for Transport (2005);
- Planning Advice Note 1/2011: Planning and Noise (2011);

- Planning Advice Note 2/2011: Planning and Archaeology (2011);
- Flood Risk: Planning Advice (2015); and
- Scottish Government Draft Planning Guidance: Biodiversity (2023).

Aberdeenshire Council planning advice

- PA1012-01: Aberdeenshire Forestry and Woodland Strategy (2016);
- PA2023-10: Securing Positive Effects for Biodiversity (2023);
- PA2023-12: Outdoor Access and Development (2023);
- PA2023-13: Pipelines and Hazardous Development Zones (2023);
- PA2023-15: SP=EED (Effective Engagement and Delivery) (2023);
- PA2023-17: Baseline Ecological Survey (2023); and
- PA2023-20: Trees and Development (2023).

5.3.2 National Policy Statements (NPS)

5.3.2.1 Energy policy energy generally remains a UK reserved matter and therefore the UK Government's policy for the delivery of energy infrastructure, as set out within a suite of Energy National Policy Statements (NPSs), are also a material consideration.

5.3.2.2 A summary of the main elements of the Overarching National Policy Statement for Energy (EN-1); National Policy Statement for Renewable Energy Infrastructure (EN-3); and the National Policy Statement for Electricity Networks Infrastructure (EN-5) (Department for Energy Security & Net Zero, 2023a; 2023b; 2023c, 2025 respectively), which are relevant to the Project are set out in **Volume 3, Appendix 2.1** of the **EIA Report**.

NPS EN-1 2023 Overarching National Policy Statement for Energy

5.3.2.3 NPS EN-1 2023 Overarching National Policy Statement for Energy identifies that in order for the UK to meet its energy requirements now and in the future, large scale energy infrastructure is needed. In addition, the UK needs to considerably increase its domestic supply of clean energy from renewable sources, which will necessitate associated energy infrastructure. The development of large scale energy infrastructure is identified as helping to increase energy security and can help make energy bills more affordable for the consumer.

5.3.2.4 EN-1 goes further, identifying that in order for the UK to meet its legal requirement to be net zero by 2050, it will need considerably more renewable energy, with this mainly being provided by solar and wind development. Offshore wind is identified as having a crucial role in meeting domestic UK energy demand and helping to reduce the cost of electricity.

NPS EN-3 2023 National Policy Statement for Renewable Energy Infrastructure

5.3.2.5 NPS EN-3 2023 National Policy Statement for Renewable Energy Infrastructure states that applications for renewable energy infrastructure need to clearly demonstrate that such infrastructure is well designed and reduces its potential impacts upon its surroundings, especially local landscapes and visual amenity. Overall, EN-3 is seeking to ensure renewable energy development and any of its associated infrastructure (including onshore infrastructure) minimise their adverse impacts whilst maximising their potential benefits to a local area.

NPS EN-5 2023 National Policy Statement for Electricity Networks Infrastructure

5.3.2.6 NPS EN-5 2023 National Policy Statement for Electricity Networks Infrastructure further emphasises the need for the UK to have a secure energy supply now and in the future and identifies that renewable energy development, such as offshore wind, is needed in order to achieve a secure energy supply.

6. Policy Assessment

6.1 Introduction

6.1.1.1 The starting point for any policy assessment should be a recognition of the established acceptability of the development in principle. This foundation is supported from multiple perspectives, providing a clear basis for further evaluation. In line with NPF4, the assessment is founded on the accepted principle of development as set out in national policy, offering a clear and robust basis for consideration of detailed impacts.

6.2 Principle of Development

6.2.1.1 The principle of the Project is well-established from multiple perspectives. Notably, the demand for strategic-scale offshore electricity generation and associated grid connection infrastructure is identified in Annex B of NPF4 – National Development Statements of Need (see page 97), and under the NPF4 category 3: Strategic Renewable Electricity Generation and Transmission Infrastructure which is described as:

> "*new and/or upgraded infrastructure directly supporting onshore and offshore high voltage electricity lines, cables, and interconnectors, including converter stations, switching stations, and substations.*"

6.2.1.2 NPF4 confirms that designated National Developments are significant developments of national importance that are needed, and will help to deliver, Scotland's spatial strategy. As a National Development, the principle of the Project is established at the national level and does not require further consideration. It is therefore expected that the assessment of the consenting applications for the Project will focus on detailed consideration of predicted impacts and proposed mitigation, as well as the potential need for conditions, rather than the acceptability of the development in principle.

6.2.1.3 The Project also benefits from broad support in principle under Policy 11 (Energy) of NPF4 and Policy C2 of the Aberdeenshire LDP (2023), provided that it does not result in any unacceptable significant effects. The determination of such effects is made through assessment against topic-specific policies within the Development Plan and other material consideration.

6.2.1.4 The principle of the development gains further strong support from Policy 1 Tackling Climate and Nature Crises within NPF4, which confirms that "significant weight will be given to the global climate and nature crises" when considering all development proposals. Alongside the Project's National Development status, this should be the starting point for the determination of the consenting applications.

6.2.1.5 As detailed in **Section 3 – The Need for and Benefits of the Project**, as a proposed strategic-scale floating offshore wind farm (and associated grid connection) the Project responds directly to relevant climate and energy policy drivers and targets. The Project directly aligns with six defined project objectives and is needed to help address the global climate crisis through the provision of 3GW of renewable electricity into the Scottish and wider UK electricity grid. This also means that the Project is predicted to 'pay back' its GHG emissions contributions within just 7.5 years and then would proceed to provide a net carbon saving.

6.3 Environmental effects of the Project - overview

6.3.1.1 This section provides the planning assessment of the Project's onshore elements and demonstrates how the Project accords with relevant key planning policy. The section comprises a series of tabular assessments which summarise and consider the key predicted effects from the Project against relevant policy requirements. For ease and to avoid repetition, topics have been grouped thematically with the impact assessments and embedded environmental measures for the corresponding chapters noted in the relevant table.

6.3.1.2 Where likely significant adverse effects are anticipated as a result of the Project, these residual impacts are identified in the context of supporting embedded environment measures. This section balances these effects against the overall need for the Project.

6.3.1.3 A summary of the key policy and legislation against which the Project has been assessed is outlined in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1** of the **EIA Report**.

6.3.1.4 This section is structured as follows:

- **Section 6.4: Environmental and ecological factors**
  - terrestrial ecology and ornithology
  - water resources and flood risk
  - ground conditions and contamination
- **Section 6.5: Climate context**
  - greenhouse gases
  - climate resilience
- **Section 6.6: Landscape, heritage, land use and civil and military aviation**
  - landscape and visual
  - onshore archaeology and cultural heritage
  - land use
  - civil and military aviation
- **Section 6.7: Amenity and human health effects of the Project**
  - air quality
  - onshore noise and vibration
  - traffic and transport
- **Section 6.8: Socio-economic considerations**.

6.4 Environmental and ecological factors

6.4.1 Terrestrial ecology and ornithology

Table 6.1 Terrestrial ecology and ornithology

	Policy assessment

Summary of key policy requirements	NPF4 (2023):
	• Policy 1 Tackling Climate and Nature Crises
	• Policy 3 Biodiversity
	• Policy 4 Natural Places
	• Policy 6 Forestry, Woodland and Trees
	• Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings
	• Policy 11 Energy
	• Policy 20 Blue and Green Infrastructure
	
	NPF4 Planning Guidance (2023):
	• Biodiversity: draft planning guidance
	
	Aberdeenshire Council's LDP (2023):
	• Policy P1 Layout, Siting and Design
	• Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land
	• Policy E1 Natural Heritage
	• Policy E3 Forestry and Woodland
	• Policy C2 Renewable Energy
	• Policy PR1 Protecting Important Resources
	• Aberdeenshire Council Planning Advice:
	  ○ PA2023-10: Securing Positive Effects for Biodiversity (2023)
	  ○ PA2023-17: Baseline Ecological Survey (2023)
	  ○ PA2023-20: Trees and Development (2023)

Impact assessment	**Volume 1, Chapter 23: Terrestrial Ecology and Ornithology** of the **EIA Report** has identified **No Likely Significant** effects resulting from the Project, including no potential transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** both identified no likely significant inter-related or cumulative effects respectively. The majority of identified potential effects from the Project during its construction and decommissioning stages for terrestrial ecology and ornithology are identified as having a Negligible or Neutral magnitude of effect and assessed as **Not Significant**. Low magnitude of effects which are assessed as **Not Significant** are identified in relation to Loch of Strathbeg Special Protection Area (SPA) / Ramsar qualifying interest features, which include pink-footed geese and whooper swan during construction and decommissioning of the Project. This is as a consequence of increased human presence, noise and vibration, and increased light levels during construction at the landfall(s) and onshore export cables leading to disturbance and displacement effects and potential loss of foraging habitat during winter months. Similar effects are likely to be experienced by the winter bird assemblage associated with the Rattray Head to Peterhead Local Nature Conservation Site (LNCS).

	Policy assessment
	Low magnitude of effects are also identified in relation to badgers and otters during the construction and decommissioning stages due to the extent of the Projects land take and construction activities, including potential fragmentation of habitats. Identified effects within the construction and decommissioning stage are identified as being temporary and sporadic, reflecting the nature of construction and decommissioning activities. For the O&M stage of the Project, potential effects upon the identified receptors are assessed to have a Negligible magnitude of effect and are assessed as **Not Significant**.
Embedded environmental measures	A range of environmental measures are provided within the **Volume 3, Appendix 5.2** of the **EIA Report**, which relate to terrestrial ecology and ornithology. They are embedded as part of the Project design to remove or reduce significant environmental effects as far as practicable. Examples of these environmental measures include, but are not limited to: • the use of a trenchless solution to install ducts to reduce the environmental impact of the landfall(s); • pre-construction ecology surveys and the employment of an Ecological Clerk of Works (ECoW) in accordance with the Outline Construction Environment Management Plan (CEMP); and • the implementation of a Bird Protection Plan (BPP) and onshore Species Protection Plan (SPP). The following environmental measures are relevant to this topic aspect: M-001, M-002,M-005, M-006, M-007, M-008, M-009, M-011, M-012, M-027, M-063, M-066, M-077, M-080, M-085, M-086, M-124, M-126, M-132, M-133, M-134, M-135, M-136, M-148, M-156, M-213, M-214, M-215 and M-216.
Planning assessment	Relevant policies set out criteria for the Project to protect natural heritage assets and biodiversity from unacceptable adverse impacts as well as to deliver proportionate biodiversity enhancement. The Project has been carefully sited and designed to ensure it would avoid or minimise potential effects on Important Ecological Features (IEFs) including statutory and non-statutory nature conservation designations, habitats and species, where possible. Where these IEFs fall within the Red Line Boundary, environmental measures will ensure that such designations and protected species or habitats will be avoided by the temporary and permanent project footprint or appropriately mitigated. This avoidance will be detailed within the Outline CEMP and secured by planning condition. The construction and decommissioning methods that would be utilised incorporate extensive embedded environmental measures. They have been carefully considered to further reduce the potential effects from the Project's construction and decommissioning phases to either a Low or Negligible magnitude **(Not Significant)** resultant impact upon ecological and ornithological receptors concluded. Such effects are also identified as being temporary and sporadic in nature, reflecting how the construction and decommissioning stage would be carefully managed to ensure it causes minimal disturbance and displacement to local species (particularly birds, otters and badgers) and minimise any potential severance effects caused by construction activities. For the O&M stage, all potential effects upon the identified receptors are anticipated to be of Negligible magnitude **(Not Significant)**. The operational lifetime of the Project for each phase is expected to be around 35 years and would require, during

	Policy assessment
	the O&M stage, a low level of maintenance and inspection. As such, the land upon which the Project would be sited will remain relatively undisturbed by Project activities presenting an opportunity for species to re-inhabit the site following construction. The Project is supported by a **Nature Positive Plan** (**NPP**), which outlines the strategic framework through which further biodiversity enhancement will be identified, developed, implemented, monitored, and reported across both the onshore and offshore components of the Project. The NPP identifies that the Project would undertake up to approximately 11.7ha of wildflower planting, with the exact size and layout of the available space to be finalised post consent. The NPP also identified that up to three Sustainable Urban Drainage Systems (SuDS) ponds created during the construction stage of the Project could be enhanced to ensure they become valuable ecological features that act as freshwater habitats to local species and help to improve the biodiversity of their surroundings. The NPP identifies the potential for offsite nature enhancement, with consultation with key stakeholders identifying that riparian restoration and coastal dune management as being feasible and generating the most ecologically valuable benefits. Following the consent of the Project, there is potential for hedgerow restoration and enhancement to occur, which would be informed by a post-consent assessment of hedgerows within the Project. Given the potential effects identified, it is considered that the Project would satisfy the policy requirements of NPF4 policies 3 Biodiversity, 4 Natural Places, 6 Forestry, Woodland and Trees, 9 Brownfield, Vacant and Derelict Land and Empty Buildings, 11 Energy and 20 Blue and Green Infrastructure and policies C2, P1, P4, E1, E3 and PR1 of the Aberdeenshire Council's LDP. The Project is also identified as being in accordance with the Scottish Government Draft Planning Guidance: Biodiversity (2023) document and relevant Aberdeenshire Planning Advice documents, including PA2023-10: Securing Positive Effects for Biodiversity (2023), PA2023-17: Baseline Ecological Survey (2023) and PA2023-20: Trees and Development (2023). Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.4.2 Water resources and flood risk

Table 6.2 Water resources and flood risk

	Policy assessment
Summary of key policy requirements	NPF4: • Policy 1 Tackling Climate and Nature Crises • Policy 10 Coastal Development • Policy 11 Energy • Policy 22 Flood Risk and Water Management Aberdeenshire Council's LDP (2023): • Policy C1 Using Resources in Buildings • Policy C2 Renewable Energy • Policy C4 Flooding

	Policy assessment
	• Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land • Policy PR1 Protecting Important Resources Scottish Government: • PAN Flood Risk: Planning Advice (2015)
Impact assessment	The assessments reported in **Volume 1, Chapter 20: Water Resources and Flood Risk** of the **EIA Report** conclude that there will be no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively. The assessments which are reported in the above chapters conclude that effects upon the water environment will be Negligible (**Not Significant**) for the majority of identified receptors across all the stages of the Project. Effects greater than negligible are concluded as Minor Adverse (**Not Significant**) effects. Such effects have been identified in the construction stage of the Project, with potential Minor adverse effects identified on receptors such as surface Water Framework Directive (WFD) water bodies, groundwater WFD water bodies, the River Ugie, Private Water Supplies (PWS) and public water supplies. In terms of potential effects during the O&M of the landfall(s), onshore export cables and onshore substations, Negligible (**Not Significant**) effects are identified for the majority of receptors, with the exception of surface Water Framework Directive (WFD) water bodies, groundwater WFD water bodies and public water supplies, in which Minor Adverse (**Not Significant**) effects are concluded. During decommissioning of the landfall(s), onshore export cables, and onshore substations, Negligible (**Not Significant**) effects are identified for Ground Water Dependent Terrestrial Ecosystems (GWDTE), wetlands, PWS, Scottish Environment Protection Agency (SEPA) Controlled Activity Regulations (CAR) abstractions, and flood risk receptors. Negligible to Minor Adverse (**Not Significant**) effects are predicted for groundwater and surface WFD water bodies, and Minor Adverse (**Not Significant**) effects for public water supplies. The Project would not require the construction of coastal protection measures as outlined in NPF4 Policy 10.
Embedded environmental measures	A range of environmental measures are identified within **Volume 3, Appendix 5.2:** of the **EIA Report** which relate to water resources and flood risk and these are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. The environmental measures include, but are not limited to, the onshore export cable being carefully sited to avoid receptors such as PWS and SEPA CAR, commitments to monitor the water quality of PWS within 250m of the Project to ensure they are not compromised and measures to reduce potential effects on the River Ugie Drinking Water Protection Area (DWPA). The following environmental measures are relevant to this aspect: M-001, M-002, M-003, M-004, M-005, M-006, M-008, M-013, M-014, M-015, M-016, M-019, M-20, M-022, M-023, M-063, M-069, M-070, M-076, M-077, M-078, M-080, M-081, M-082, M-124, M-125, M-126, M-127, M-128, M-129, M-131, M-132, M-137, M-138, M-139, M-140, M-141, M-142, M-143, M-144, M-145, M-146, M-147, M-148, M-149, M-150, M-151, M-152, M-153, M-154, M-155, M-156, M-157, M-164.

	Policy assessment
Planning assessment	Relevant policies set out criteria to ensure the Project is not at unacceptable levels of flood risk and demonstrates it has appropriately assessed and reduced its risk of flooding and does not compromise the water environment or water resources. The Project has been carefully sited and designed to ensure it would avoid and minimise its potential effect on water resources, including PWS, Public Water Supplies, ground and surface WFD water bodies, and the River Ugie. The greatest impact identified on these receptors across all of the stages of the Project are Minor Adverse (**Not Significant**) effects, demonstrating the Project's location and scale to have been carefully considered, alongside how it would be constructed, operated, maintained and decommissioned. Furthermore, the Project has been carefully sited and designed to avoid areas at risk of flooding, wherever possible, with Negligible (**Not Significant**) effects identified in relation to flood risk receptors., from the Project would not be at risk from potential changes to sea levels/coastal changes nor would it increase the risk of flooding in its surroundings or compromise water resources. The onshore elements of the Project have been sited away from areas at risk of flooding, such as siting its elements away from fluvial floodplains. The Project is therefore identified to be at a low risk of fluvial flooding and have a low risk of surface water flood risk. The Project includes a wide range of environmental measures which would further help to reduce its potential effects on water resources and minimise its flood risk (especially from sea level rise/coastal flooding), which is reflected in the potential effects identified. It is expected that these measures would be secured by planning condition. The Project would not result in a need to construct coastal defence measures. Given the low level of potential effects identified due to the siting, design and environmental measures associated the Project, it is considered that the Project would be in accordance with NPF4 policies 1 Tackling Climate and Nature Crises, 10 Coastal Development, 11 Energy and 22 Flood Risk and Water Management and policies C1, C2, C4, P4 and PR1 of the Aberdeenshire Council's LDP and the guidance within PAN - Flood Risk: Planning Advice (2015). Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.4.3 Ground conditions and contamination

Table 6.3 Ground conditions and contamination

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 5 Soils • Policy 11 Energy • Policy 12 Zero Waste • Policy 23 Health and Safety. • Policy 29 Rural Development

	Policy assessment
	Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land • Policy E1 Natural Heritage • Policy PR1 Protecting Important Resources
Impact assessment	**Volume 1, Chapter 19: Ground Conditions and Contamination** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively. The greatest potential effect identified is from the permanent loss of soils / agricultural / other land due to the construction of the above ground elements of the Project, which could potentially cause a Moderate Adverse (**Not Significant**) effect. Such effects are identified due to the amount of land take and subsequent loss of soils required by the Project's onshore elements. However, these effects are considered **Not Significant,** given the land would be restored following the conclusion of the Project's lifecycle and that measures embedded into the Project's design ensure any land taken is strictly necessary. Remaining potential effects identified across all stages of the Project would be either Negligible Adverse (**Not Significant**) or Minor Adverse (**Not Significant**) effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** both identified no significant inter-related or cumulative effects respectively.
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to ground conditions, including soils and land contamination are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples include, but are not limited to, the use of soil handling, protection of soft or wet ground from compaction by construction traffic, a commitment to protect and maintain/reinstate existing land drainage systems and to ensure the land used is suitable for the Project, assessment of land contamination in accordance with UK statutory guidance, and an unexpected contamination protocol. The following environmental measures are relevant to this aspect: M-001, M-002, M-005, M-007, M-013, M-015, M-016, M-017, M-018, M-021, M-023, M-025, M-027, M-063, M-066, M-067, M-068, M-069, M-070, M-071, M-072, M-073, M-074, M-075, M-076, M-083 and M-112.
Planning assessment	Relevant policies set out the requirement for the Project to ensure it does not compromise geology/geodiversity sites, unacceptably use agricultural land and does not create contaminated land. **Volume 1, Chapter 19: Ground Conditions and Contamination** of the **EIA Report** has identified the Project would not affect sensitive geology, geodiversity sites, mineral receptors, or prime agricultural land (Classes 1, 2, or 3.1), as none are present within the study area. This demonstrates careful siting to minimise potential effects, with the greatest identified relating to Impact C2: Permanent loss of soil / agricultural / other land due to construction of above ground elements of the Project (Moderate Adverse and Not Significant effects).

	Policy assessment
	It is further identified that the Project has been designed and carefully sited to avoid areas of peat as far as possible through the onshore optioneering process. A Peat Management Plan (PMP) will be developed if peat cannot be avoided. Overall, the Project minimises land take, avoids prime agricultural land, areas of peat and carbon-rich soils. A range of environmental measures have also been proposed to minimise the Project's potential effects upon identified receptors. Together, the limited anticipated effects upon receptors, alongside the implementation of environmental measures, ensures the Project aligns with NPF4 Policy 5. With reference to Aberdeenshire Council's LDP Policy P4, the Project would not result in the contamination of land within or surrounding the site, with effects recorded as Negligible (**Not Significant**). This is partially due to environmental measures such as ensuring pollution would be prevented, and measures and ensuring compliance with UK statutory guidance for management of land contamination risks. The Project would be committed to ensuring that vehicle maintenance and refuelling / oil changes for machinery / equipment will be undertaken within designated areas where spillages can be easily contained. Machinery will also be routinely checked to ensure it is in good working condition. Finally, following decommissioning, the site would be restored, returning ground conditions to their pre-development state, thus complying with NPF4 Policy 11 Energy. In conclusion, it is considered that the Project would be in accordance with NPF4 policies: 1 Tackling the Climate and Nature Crises of NPF4 5 Soils, 11 Energy, 12 Zero Waste, 23 Health and Safety and 29 Rural Development and policies C2, E1, P4 and PR1 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.5 Climate context

6.5.1 Greenhouse gases

Table 6.4 Greenhouse gases

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 2 Climate Mitigation and Adaptation • Policy 11 Energy Aberdeenshire Council's LDP (2023): • Policy C1 Using Resources in Buildings • Policy C2 Renewable Energy • Policy C3 Carbon Sinks and Stores

	Policy assessment
Impact assessment	**Volume 1, Chapter 29: Greenhouse Gases (GHG)** of the **EIA Report** has identified no likely significant adverse effects resulting from the Project, including no transboundary, inter-related or cumulative effects (the latter two being covered inherently within **Chapter 29: Greenhouse Gases** of the **EIA Report** due to the nature of GHG effects and not within separate Chapters on inter-related or cumulative effects). The construction, O&M and decommissioning of infrastructure will inevitably generate greenhouse gas emissions. These have been quantified for each of the lifecycle stages (construction, O&M and decommissioning). The combined GHG emissions attributed to development of the Project are assessed to have a negligible contribution to the UK Carbon Budgets, and therefore are unlikely to affect the UK's ability to meet its future net zero carbon targets. On this basis the significance of effect is assessed as Minor Adverse (**Not Significant**). Overall, the assessment reported in the Chapter identifies that the Project would have a **Beneficial** (**Significant**) effect due to the Project aiding in the decarbonisation of the UK's national electricity network. The beneficial effect of renewable energy generation substantially exceeds the Minor Adverse effects arising from construction, O&M and decommissioning.
Embedded environmental measures	A range of supporting environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to GHG are embedded as part of the Project's design to remove or reduce significant effects as far as possible. Measures to minimise the lifecycle of GHG emissions will be implemented, especially during the Project's construction stage, including in relation to construction traffic. The following supporting environmental measures are relevant to this aspect: M-079, M-098 and M-099.
Planning assessment	Relevant policies set out criteria requiring proposals to minimise their lifecycle contribution to the generation of GHGs and contribute to climate change mitigation. When constructing, operating and decommissioning energy infrastructure it is inevitable that there would be a release of GHG into the atmosphere. However, the Project has been designed to minimise emissions, such as choosing a location where peat is absent (for onshore assets), and embedding environmental measures within the Project which limit emissions. As such, the GHG emissions are assessed to be Minor Adverse (**Not Significant**). The Project would deliver up to 3GW of renewable energy generation capacity that would directly contribute to decarbonisation of the UK national electricity network and wider UK net zero targets. Overall, therefore the Project would deliver significant benefits to the UK, whilst ensuring it minimises the levels of GHG generated over the Project's lifetime. Through its supporting environmental measures, the Project would commit itself to maximising the potential to reduce lifecycle GHG emissions, including those at construction stage, as managed by the supporting Outline CEMP. Given the significant contribution of its electricity generation over the Project lifetime, it is expected to offset its lifecycle emissions after 7.5 years of its operational life, with a net carbon savings of 1,614,670 tCO_2e/year. This further demonstrates the Project's contribution to GHG reduction. The Planning Assessment concludes that the Project is in accordance with policies 2 Climate Mitigation and Adaptation and 11 Energy of NPF4 and policies C1, C2 and C3 of the Aberdeenshire Council's LDP. It is also considered that the Project

	Policy assessment
	would help to meet the renewable energy targets of the UK and Scotland, which are sought to help decarbonise the electricity grid. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.5.2 Climate resilience

Table 6.5 Climate resilience

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 2 Climate Mitigation and Adaptation • Policy 10 Coastal Development • Policy 11 Energy • Policy 14 Design, Quality and Place • Policy 22 Flood Risk and Water Management NPF4 Planning Guidance (2025): • Policy 2 - climate mitigation and adaptation. Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy C4 Flooding
Impact assessment	**Volume 1, Chapter 28: Climate Resilience** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. Due to the nature of potential effects relating to the climate resilience of the Project, the majority of potential effects are 'very unlikely' or 'unlikely' to occur and would have either a Negligible (**Not Significant**) or Minor (**Not Significant**) effect. The climate resilience assessment identified 'possible' Minor Adverse (**Not Significant**) effects due to the increase in frequency and severity of storms as a result of climate change. Such storms have the potential to affect every stage of the Project through delaying work, causing damage to plant / machinery and human health. Similarly, the increased risk of flooding associated with climate change would have similar effects. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** identifies that the climate resilience assessment is different to other technical aspects reported upon in the EIA as the receptor assessed is the Project, and not receptors within the environment. As such, there are no receptor-led inter-related effects. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies that the resilience of the Project assets is unaffected by the 'other developments', as such the climate change resilience assessment provided no additional consideration of cumulative effects.

	Policy assessment
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to climate change are embedded as part of the Project design to remove or reduce significant effects as far as possible. Examples of these environmental measures include, but are not limited to, ground investigation studies to inform foundation design, siting of critical infrastructure on level terrain and the use of Sustainable Urban Drainage Systems (SuDS) to help ensure the Project is as flood resilient as possible. The following environmental measures are relevant to this aspect: M-001, M-016, M-20 M-028, M-054, M-063, M-080, M-081, M-097, M-106, M-119, M-158, M-159, M-160, M-161, M-162, M-163, M-164, M-165, M-166, M-167, M-168, M-169, M-170, M-171, M-172, M-173, M-174, M-175, M-176, M-177, M-178, M-179, M-180, M-181, M-182, M-188, M-189, M-190, M-191, M-192, M-193, M-194, M-195, M-196, M-197, M-198 and M-211.
Planning assessment	Relevant policies set out a need for the Project to ensure it would be resilient to the ongoing and emerging effects of climate change. The Project has been carefully sited and designed to ensure it maximises its resilience to the ongoing and emerging effects of climate change. This is demonstrated by **Volume 1, Chapter 28: Climate Resilience** of the **EIA Report** identifying no significant effects from this aspect, with potential effects identified primarily being 'very unlikely' or 'unlikely'. Where there is the potential for effects, these would be Negligible (**Not Significant**) to Minor Adverse **(Not Significant)** effect. Environmental measures associated with climate resilience, including the Outline CEMP, ensure the Project maximises its resilience to climate change and does not compromise the climate resilience of its surroundings. The Project is not at risk from rising sea levels, storms, or flooding. It incorporates well-designed SuDS and locates relevant infrastructure away from flood-prone areas. As a result, this coastal development does not endanger itself or its surroundings from coastal or sea flooding. The **Outline Operational Drainage Management Strategy** ensures effective drainage management for onshore substations during the Project's O&M stage, even in severe weather or flooding. During construction and decommissioning, potential effects are limited to activity disruption and will be managed through weather monitoring, health and safety prioritisation, and pausing work if severe events occur. Plant and resources will be secured to prevent damage during storms or flooding. Across all stages of the Project, management would be in accordance with strategies such as the Outline Operational Drainage Management Strategy and Outline CEMP, ensuring emergency procedures are in place and works scheduled to avoid severe seasonal weather, reducing exposure and safeguarding workers. The Planning assessment concludes that the Project would be in accordance with the requirements of policies 1 Tackling the Climate and Nature Crises, 2 Climate Mitigation and Adaptation, 10 Coastal Development, 11 Energy, 14 Design, Quality and Place, 22 Flood Risk and Water Management of NPF4 and policies C2 and C4 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6 Landscape, heritage, land use and civil and military aviation

6.6.1 Landscape and visual

Table 6.6 Landscape and visual

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 4 Natural Places • Policy 6 Forestry, Woodland and Trees • Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings • Policy 11 Energy • Policy 14 Design, Quality and Place • Policy 27 City, Town, Local and Commercial Centres • Policy 29 Rural Development Aberdeenshire Council's LDP (2023) • Policy P1 Layout, Siting and Design • Policy E2 Landscape • Policy E3 Forestry and Woodland • Policy C2 Renewable Energy • Policy R1 Special Rural Areas • Policy R2 Development Proposals Elsewhere in the Countryside • Policy HE2 Protecting Historic, Cultural and Conservation Areas
Impact assessment	Significant residual effects arising during all stages of the Project are identified within **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report**. It should be noted that the Landscape and Visual Impact Assessment methodology considered the scale and geographical extent of the development to determine a level of effect and whether this is significant. The assessment has reported the nature of the effect separately, including its duration and whether it is adverse, neutral, or beneficial. The magnitude and significance of these potential effects range from there being no effects, or negligible to zero (**Not Significant**) effects, on identified landscape and/or visual receptors, to high (**Significant**) effects. The nature of these effects would be largely short to medium term during construction and decommissioning and long-term during O&M. Some effects, including significant effects, may be beneficial, according to the implementation of the **Outline Landscape and Architectural Strategy (OLAS)**. During the Project's construction, significant landscape effects would be expected upon the following identified receptors, which include the constituent landscape elements, key characteristics and special landscape qualities: • CCT 3: Deposition Coastline, Open Views; • LCT 12: Beaches, Dunes and Links; • LCT 17a: Coastal Agricultural Plain; • LCT 17c: A950 / Longside Airfield; and • the North East Aberdeenshire Coast SLA. The majority of these effects would occur during phase 1 of the construction stage and due to the progressive nature of construction works for underground export

	Policy assessment
	cables, would be temporary and affect localised areas in phases. The nature of these effects could also be beneficial following to the implementation of the **OLAS**. During construction of the landfall(s) and onshore export cable corridors, significant effects on vegetation are expected. It should be noted that some of these effects are anticipated to be beneficial, according to the implementation of **OLAS**. Significant visual effects upon: two transport routes; some minor roads; recreational routes; and some limited tourist/visitor attractions are expected to arise during the Project's construction and O&M stages. The nature of these effects would be largely short to medium term during construction and long term during O&M. Long term effects would, however, impact a localised area around the onshore substations and reduce over time as landscape mitigation becomes established. The effects could also be beneficial according to the implementation of the **OLAS** which allows for an architectural strategy and consideration of the development as a piece of architecture, regardless of personal aesthetic preferences. During the Project's O&M stage, significant landscape effects are expected from the onshore substations upon LCT 17a: Coastal Agricultural Plain and LCT 17c: A950 / Longside Airfield. The nature of these effects would be long term, however as noted previously, they would affect a localised area around the onshore substations. Moreover, the effect is expected to reduce over time as landscape mitigation becomes established and reduces the potential effects from the substations. Similar to the effects on transport and recreation noted above, effects on LCT 17a and LCT 17c are subject to detailed design and may offer opportunities for mitigation through the architectural design strategy. A fully enclosed option is likely to have the greatest scope for architectural mitigation, whereas a partially enclosed option may limit the scope to a reduced number of buildings and the appropriate choice of colour and materials. In either case, the architectural design strategy would review potential opportunities to avoid and reduce significant and adverse landscape and visual effects within the maximum design parameters. Significant landscape and visual effects resulting from the onshore substations are expected during the construction, O&M and decommissioning stages. During O&M these effects could be beneficial depending on the effective implementation of the **OLAS**. Significant landscape effects would result from the decommissioning stage of the Project upon LCT 17a: Coastal Agricultural Plain and LCT 17c: A950 / Longside Airfield receptors. It is important to note that the onshore export cables would be left *in-situ* and therefore have been scoped out of the decommissioning assessment. The Project's decommissioning would be subject to a Decommissioning Plan which would consider potential landscape and visual effects during this stage. There would be no transboundary effects resulting from the Project. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** identifies no inter-related effects of greater significance compared to the effects considered alone for landscape and visual receptors during the construction, O&M, and decommissioning stages of the Project. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies significant adverse and combined cumulative landscape and visual effects resulting from the following 'other developments' in combination with the Project: • ON-001: Scottish and Southern Electricity Network (SSEN) Netherton; • ON-008: Inverugie Meadows Residential Mixed Use Development;

	Policy assessment
	• ON-010: Salamander Offshore Wind Farm; • ON-012: Muir Mhòr Offshore Wind Farm (onshore infrastructure); • ON-017: Erection of three Wind Turbines; and • ON-022: Installation of Underground Cable, Erection of Substation Building and Siting of Transformer Units and Associated Works - Green Energy International. Potential cumulative landscape and visual effects would occur from the construction phases of the Project and the 'other developments', due to concurrent and / or sequential construction stages, although the nature of these effects would be temporary. For ON-001 and ON-012, significant, combined cumulative landscape and visual effects would occur during the O&M stage of the Project.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** which relate to the landscape and visual resource are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, the application of an **OLAS**, maximising the retention of trees, woodlands and hedgerows and the use of an on-going design process to avoid, minimise and mitigate the potential effects of the Project through the use of underground export cables and trenchless crossings. The following environmental measures are relevant to this aspect: M-001, M-002, M-005, M-006, M-011, M-016, M-019, M-024, M-026, M-027, M-063, M-066, M-070, M-093, M-103. M-104, M-107, M-108, M-109, M-110, M-111, M-185 and M-201.
Planning assessment	Relevant policies set out detailed criteria for the Project to protect the landscape and visual amenity, character and setting of its surroundings from unacceptable adverse impacts, alongside creating an expectation for mitigation and/or landscape improvements to be demonstrated. As detailed in **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** of the **EIA Report** and consistent with NPF4 Policy 4, the Project has been designed and sited to minimise its potential effects on landscape and visual receptors. Whilst some significant effects have been identified, such effects have been localised and minimised through the use of design mitigation so are considered to be acceptable in accordance with Policy 11e) ii within NPF4. This policy also recognises that significant landscape and visual impacts are to be expected from some types of renewable energy development. The Project's design ensures that the onshore export cables will be underground, thus minimising the landscape and visual impacts. Moreover, areas of trees, forests and/or woodland have been avoided as far as possible and where vegetation removal is unavoidable, this would be subject to a reinstatement strategy as part of the **OLAS**. The **OLAS** sets out a range of mitigation measures to address any significant adverse effects anticipated. This strategy would mitigate adverse effects and could also have a residual beneficial effect, particularly where scope exists for the onshore substations' development to be considered an architectural feature. Whilst these mitigation measures' main function is to mitigate adverse landscape and visual effects, other associated benefits would also emerge such as habitat creation and ecological benefits. Such mitigation measures would ensure the effects of the Project could be spatially contained and only local in nature, whilst still being supported by a range of mitigation that would aid in reducing effects over time as such mitigation measures become established. This would further satisfy the requirements of Policy 11 of the NPF4.

	Policy assessment
	The Project has committed to landscape management and monitoring as described in the **OLAS**. Unforeseen landscape and visual effects, resulting from a change to the baseline for example, would be addressed as part of the Landscape Management Plan as set out in **OLAS**. All landscape planting would be maintained for 10 years to ensure its establishment. Offsite or potential further mitigation is proposed in response to residual, significant and adverse landscape and visual effects resulting from the size and scale of the onshore substations and is not part of the embedded mitigation. The potential further mitigation would seek to positively manage, create, reinforce / reinstate woodland and hedgerows within the area surrounding the onshore substations to increase screening and / or enhance landscape settings to better integrate the development within its landscape context. The Applicant intends to establish an Amenity Fund to fund the installation of hedgerows and / or other suitable landscaping measures outwith the onshore substation site. This will be developed with Aberdeenshire Council at the detailed design stage to identify the scope and effective administering of the fund to ensure mitigation benefits are effectively delivered. The details of potential further mitigation will be finalised in the detailed Landscape and Architectural Strategy, subject to landowner agreement, and would comply with road safety and utility corridor requirements to be deliverable. All potential further mitigation would seek to also provide additional benefits of locally enhanced landscape character, improved biodiversity, habitat creation, and agricultural benefits (e.g. field enclosure and / or stock shelter). In conclusion, the Project has been sited and designed to an appropriate standard to avoid adverse effects in the first instance and provide mitigation for subsequent outstanding effects. Certain mitigation measures, associated with the implementation of the **OLAS** and landscape and architectural strategy, would both reduce adverse effects and could also provide beneficial effects (negating significant adverse effects). Although residual significant adverse effects may remain, these are expected to be temporary and localised in nature, and would entail appropriate mitigation such that O&M effects could be beneficial, subject to the implementation of the **OLAS**. As such, the Project is considered to be in accordance with NPF4 Policy 11. This policy also indicates that where impacts are localised or appropriate design mitigation has been applied, they will generally be considered acceptable. Given that the Project would be in accordance with NPF4 policies 1 (Tackling Climate and Nature Crises), 4 (Natural Places), 6 (Forestry, Woodland and Trees), 9 (Brownfield, Vacant and Derelict Land), 11 (Energy), 14 (Design, Quality and Place), 27 (City, Towns and Local and Commercial Centres), 29 (Rural Development), and policies P1, E2, E3, C2, R1, R2 and HE2 of the Aberdeenshire Council's LDP, the benefit of and need for the Project (as set out in **Section 3**) are considered to outweigh any residual adverse effects upon landscape and visual receptors. Landscape and visual effects are discussed further as part of the planning balance in **Section 7** of this Planning Statement.

6.6.2 Onshore archaeology and cultural heritage

Table 6.7 Onshore archaeology and cultural heritage

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 7 Historic Assets and Places • Policy 29 Rural Development Aberdeenshire Council's LDP (2023): • Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings) • Policy HE2 Protecting Historic, Cultural and Conservation Areas • Policy C2 Renewable Energy • Policy E1 Natural Heritage
Impact assessment	**Volume 1, Chapter 24: Onshore Archaeology and Cultural Heritage** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively. Across the construction and O&M stages of the Project, the potential magnitude of effects range from no impact to Low which are consequently assessed as **Not Significant** effects on identified historic and archaeological receptors. The decommissioning stage was scoped out of the Chapter.
Embedded environmental measures	A range of environmental measures within the Commitments Register (**Volume 3, Appendix 5.2** of the **EIA Report**) relate to onshore archaeology and cultural heritage and are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, the use of an Outline CEMP and associated Outline Written Scheme of Investigation (WSI) that would ensure archaeological mitigation measures are embedded in the construction stage of the Project and the avoidance of buried historical structures. The following environmental measures are relevant to this aspect: M-001, M-002, M-006, M-007, M-063, M-087, M-088, M-089, M-090, M-109, M-183, M-208 and M-209.
Planning assessment	Relevant policies set out criteria for the Project to protect archaeological and heritage assets from being disturbed, alongside protecting their character and setting. The Project has been well sited and designed in order to ensure it would avoid areas of known historical and archaeological assets. Through the application of an Outline CEMP and Outline WSI, as yet undiscovered archaeological remains would be appropriately catalogued and managed, mitigating the effects upon the unknown archaeological assets of Aberdeenshire. The siting and design of the Project has carefully considered its potential effects on the setting and views from historical assets. In accordance with NPF4 Policy 7 effects have been adequately assessed. The assessment conclusions confirm that the effects upon settings and views are avoided or minimised, especially during the O&M stage of the Project. The Project is also committed to rectifying potential unforeseen effects on the character and

	Policy assessment
	setting of historical assets to ensure these elements are not compromised long-term. The extent to which the Project has endeavoured to minimise its potential effects is demonstrated in the large number of receptors identified as experiencing either no impact from the Project or a very low (**Not Significant**) effect from the Project. The planning assessment concludes that the Project is in accordance with the requirements of policies 7 Historic Assets and Places and 29 Rural Development of NPF4 and policies C2, HE1, HE2 and E1 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6.3 Land use

Table 6.8 Land use

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 4 Natural Places • Policy 5 Soils • Policy 7 Historic Assets and Places • Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings • Policy 11 Energy • Policy 12 Zero Waste • Policy 14 Design, Quality and Place • Policy 18 Infrastructure First • Policy 20 Blue and Green Infrastructure • Policy 25 Community Wealth Building • Policy 26 Business and Industry • Policy 29 Rural Development Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy P1 Layout, Siting and Design • Policy P2 Open Space and Access in New Development • Policy PR1 Protecting Important Resources • Policy R1 Special Rural Areas • Policy R2 Development Proposals Elsewhere in the Countryside • Policy E2 Landscape • Policy HE2 Protecting Historic, Cultural and Conservation Areas
Impact assessment	**Volume 1, Chapter 22: Land Use** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively.

	Policy assessment
	All of the impacts associated with this topic were identified as having a Minor Adverse **(Not Significant)** effect. This is primarily due to the avoidance of sensitive receptors such as designated sites, settlements, and prime agricultural land through design, and although the construction, O&M and decommissioning stages of the Project will result in a loss of land, this loss would be reversed following the finalisation of the decommissioning stage as land is restored. Furthermore, construction and decommissioning activities are identified as causing some temporary severance / restricting access to the land for farming due to disruption to the land, though such adverse effects are well mitigated through the use of environmental measures, the requirements of the Outline CEMP and Outline Soil Management Plan (SMP) and are temporary in nature. It is also recorded that the drainage and landscaping associated with the Project would form a permanent change of land use from agricultural land to land used for drainage and landscaping.
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** relate to land use and are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, built elements (including export cable corridors) avoiding settlements, open space and land used by the community; the Project burying the onshore export cables to minimise the need for permanent land take and the number of permanent above ground structures and ensuring the Project is designed to ensure its built elements do not cause the fragmentation of existing woodland, semi-natural land and existing habitats. The following environmental measures are relevant to this aspect: M-001, M-003, M-005, M-026, M-027, M-063, M-066, M-071, M-083, M-084, M-085, M-089 and M-112.
Planning assessment	Relevant policies set out criteria for development proposals to prioritise brownfield development and avoid undeveloped coastal locations where possible, minimise land take and integrate with nearby uses. The Project has been carefully sited and designed to ensure it requires as little land take as possible and therefore minimising effects upon land use. The construction stage of the Project will take place over a number of years, helping to minimise disruption to local farmers as not all of the required land will be developed at once. The Project avoids settlements, open space and land used by the community, alongside avoiding prime agricultural land. The permanent footprint of the Project has been minimised, with full undergrounding of onshore export cables to reduce overall adverse effects on land use. In accordance with the brownfield first principle, consideration was given to the availability of suitable brownfield sites. Upon review however, there were no sites of sufficient size and proximity to the Netherton Hub capable of accommodating the Project's substations. It is acknowledged there would be a temporary disruption to the accessibility of forestry located within the export cable corridor during construction, but due to the use of underground export cabling such effects are temporary in nature. Land affected during construction and following decommissioning will be reinstated in accordance with associated environmental measures, which would result in the restoration of the land to the original land use at end of the Project.

	Policy assessment
	In addition to the direct effects upon land use, the Project has also sought to minimise the indirect effect that would otherwise arise to people working in and passing through the Study Area The construction, O&M and decommissioning will inevitably create a level of disturbance but this will be minimised through the adoption of management procedures, for example those set out within the Outline CEMP secured by planning condition. The planning assessment concludes that the design of the Project has maximised opportunities to minimise potential effects on existing land uses and avoid causing severance, ensuring the Project is in accordance with policies 4 Natural Places, 5 Soils, 7 Historic Assets and Places, 9 Brownfield, Vacant and Derelict Land and Empty Buildings, 11 Energy, 12 Zero Waste, 14 Design, Quality and Place, 18 Infrastructure First, 20 Blue and Green Infrastructure, 25 Community Wealth Building, 26 Business and Industry and 29 Rural Development and policies C2, P1, P2, R1, R2, E2, HE2 and PR1 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6.4 Civil and military aviation

Table 6.9 Civil and military aviation

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 11 Energy Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy
Impact assessment	**Volume 1, Chapter 31: Civil and Military Aviation** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. The onshore elements of the Project would only have the potential to generate, Minor (**Not Significant**) effects, for all of the stages of the Project, on Longside Airfield. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** identified any effects would be of local spatial extent and the durations confined to the different stages. The effects during the different stages are not anticipated to interact in such a way as to generate an effect of greater significance than those assessed for individual stages. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identified that no significant cumulative effects would occur from the onshore elements of the Project.

	Policy assessment
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to civil and military aviation are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, the use of an Outline Construction Method Statement (CMS), the use of a Lighting Management Plan (LMP) and the marking of all elements of the Project on admiralty and aeronautical maps. The following environmental measures are relevant to this aspect: M-045, M-047, M-063, M-100, M-101, M-106, M-116, M-120 and M-122.
Planning assessment	Relevant policies set out a need for the Project to ensure it does not unacceptably compromise affected civil and military aviation receptors. The design and siting of the onshore elements of the Project has been carefully considered to ensure that it would minimise impacts upon civil and military aviation receptors. The onshore elements of the Project would only affect Longside Airfield. Such effects would be minor (**Not Significant**) and unlikely due to the distance from the onshore infrastructure to this airfield and the limited height of the onshore elements of the Project. The potential for such effects would also be monitored and managed consistent with the environmental measures proposed. The Ministry of Defence (MOD) responded in the Scoping Opinions (Scoping Opinions (Scottish Government, 2023b; Aberdeenshire Council, 2023b) stating that they had "*no concerns regarding the onshore aspect of this proposal*", though it is appreciated that response was based on the design of the Project at that time. The planning assessment concludes that the Project considered what effects it would have on civil and military aviation receptors and has maximised its ability to design out and mitigate such effects. This means the Project is in accordance with Policy 11 Energy of NPF4 and Policy C2 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.7 Amenity and human health effects of the Project

6.7.1 Air quality

Table 6.10 Air quality

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 23 Health and Safety Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land

	Policy assessment
Impact assessment	**Volume 1, Chapter 21: Air Quality** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively. **Volume 1, Chapter 21: Air Quality** of the **EIA Report** only identifies potential effects during the construction stage of the Project. The only potential effect scoped into the air quality assessment relates to the emissions of dust from construction affecting human and ecological receptors), this was assessed as a Negligible (**Not Significant**) effect.
Embedded environmental measures	Environmental measures which relate to air quality are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible and are presented within **Volume 3, Appendix 5.2** of the **EIA Report**. Sensitive sites will be avoided as far as possible within the temporary and permanent onshore infrastructure footprint. Best practice air quality management measures will be applied during construction, supported by an Outline CEMP to ensure all relevant environmental commitments are implemented effectively. The following environmental measures are relevant to this aspect: M-002, M-007, M-019 and M-063.
Planning assessment	Relevant policies set out criteria for the Project to ensure it would minimise its potential effects on local air quality. Potential effects on air quality are confined to just the construction stage of the Project. This is due to construction activities potentially creating dust which could impact human and ecological receptors. Effects will be Negligible (**Not Significant**). This is because the Project has been carefully sited and designed to ensure it avoids residential and ecological receptors as much as possible. Furthermore, the Project uses a range of environmental measures to ensure its potential effects are negligible, with the Outline CEMP setting out measures to avoid adverse effects on sensitive features. The planning assessment concludes that the Project is in accordance with Policy 23 Health and Safety of NPF4 and policies C2 and P4 of the Aberdeenshire Council's LDP due to it having Negligible (**Not Significant**) effects in terms of air quality and with such residual effects suitably mitigated. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.7.2 Onshore noise and vibration

Table 6.11 Onshore noise and vibration

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 11 Energy • Policy 23 Health and Safety Scottish Government: • PAN 1/2011: Planning and Noise (2011) Aberdeenshire Council's LDP (2023): • Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land
Impact assessment	**Volume 1, Chapter 25: Onshore Noise and Vibration** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively. In terms of potential effects during the construction and decommissioning stages, Negligible to Minor Adverse (**Not Significant**) effects are identified in relation to residential receptors. Similarly, the O&M stage of the Project would have, at worst, a Minor Adverse (**Not Significant**) upon residential receptors as a consequence of operational noise from the onshore substations.
Embedded environmental measures	A range of environmental measures within the Commitments Register (which is provided in the **Volume 3, Appendix 5.2** of the **EIA Report**) relate to noise and vibration and are embedded as part of the Project design to minimise likely significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to: • the implementation during the construction stage of noise mitigation and best practice techniques secured via the Outline CEMP; • the implementation of a Noise and Vibration Management Plan (NVMP); and • the implementation during the O&M stage of design limits for the operational noise from the onshore substations to meet the requirements of Aberdeenshire Council. The following environmental measures are relevant to this aspect: M-063, M-090, M-091, M-183, M-184 and M-212.
Planning assessment	Relevant policies set out criteria for the Project to ensure it would have no unacceptable noise effects on potential receptors. The Project has been carefully sited and designed to maintain an appropriate distance from residential receptors, ensuring potential effects on residential amenity as a result of noise and vibration is kept to a minimum during the construction, O&M and decommissioning of the Project. The use of environmental measures embedded into the Project secures the low level of effect which has been identified. The **Outline CEMP** is one measure which would ensure that construction noise is kept to acceptable levels during the construction stage and the NVMP would

	Policy assessment
	ensure maintenance works during the O&M stage are also maintained at acceptable noise levels. The assessment conclusions for noise reflect the well-sited and designed nature of the Project and the appropriateness of the supporting environmental measures. Similarly, measures to control vibration will ensure that levels are acceptable in amenity terms and in conclusion there would be no harm to the public from noise or vibration effects caused by the Project. The planning assessment concludes that the Project would be in accordance with Policy 11 Energy and Policy 23 Health and Safety of NPF4, Policy P4 of the Aberdeenshire Council's LDP and the Planning and Noise PAN 1/2011. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.7.3 Traffic and transport

Table 6.12 Traffic and transport

	Policy assessment
Summary of key policy requirements	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 11 Energy • Policy 13 Sustainable Transport • Policy 20 Blue and Green Infrastructure Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy RD1 Providing Suitable Services
Impact assessment	**Volume 1, Chapter 26: Traffic and Transport** of the **EIA Report** has identified no likely significant effects resulting from the Project, including no transboundary effects. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects, respectively. Potential effects resulting from the Project are confined to the construction stage, which is the only stage of the Project considered within **Volume 1, Chapter 26: Traffic and Transport** of the **EIA Report**. The O&M and decommissioning stages have been scoped out of the assessment on the basis that traffic generated during the O&M stage would be minimal and the traffic associated with the decommissioning stage is anticipated to be significantly less than that generated during construction. Potential effects from construction traffic on occupants of buildings alongside the study network and transport users using the roads range from Negligible to Minor Adverse magnitude of effect and consequently **Not Significant**.

	Policy assessment
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to traffic and transport are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, a road and core path condition survey which will be undertaken on roads and core paths affected by construction traffic before, during and after the construction stage of the Project, and the use of traffic management measures (as per the Outline Construction Traffic Management Plan (CTMP). The following environmental measures are relevant to this aspect: M-001, M-003, M-004, M-026, M-063, M-092, M-094, M-095, M-096 and M-099.
Planning assessment	Relevant policies set out criteria for the Project to ensure it would have no unacceptable adverse impacts upon road and transportation infrastructure and provides proportionate infrastructure improvements as needed. The Project has been sited and designed to make use of roads that would be able to accommodate the construction traffic generated. Construction traffic will be required to use these roads with the access strategy set out and controlled by the **Outline CTMP**. Those roads which will be used will be assessed before and after construction to ensure that their structural integrity has been maintained, with any identified concerns adequately addressed. In addition, the Project is committed to carrying out those public road improvements required in order to support the construction activities associated with the Project. The Project is also committed to construction traffic management measures, which would aid in reducing the potential effects upon occupants of residences close to roads used and help reduce potential traffic effects and keep road users safe. With these measures in place, controlled by planning condition the traffic and transport assessment concludes that effects will be no more than Minor Adverse (**Not Significant**) effects. The Project does have the potential to affect public access during its construction. It is therefore committed to providing safe alternative access arrangements and/or undertaking limited, temporary closure of such routes with prior notification provided. The Project, broadly, has been sited and designed in a manner that would avoid such routes in the first instance and use as much existing, suitable road infrastructure as possible. The planning assessment concludes that the Project would be in accordance with policies 11 Energy, 13 Sustainable Transport and 20 Blue and Green Infrastructure of the NPF4 and policies C2 and RD1 of the Aberdeenshire Council's LDP. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.8 Socio-economics

Table 6.13 Socio-economics

	Policy assessment
Summary of key policy requirements	NPF4 (2023) • Policy 1 Tackling Climate and Nature Crises • Policy 3 Biodiversity • Policy 7 Historic Assets and Places • Policy 9 Brownfield, vacant and derelict land and empty buildings • Policy 11 Energy • Policy 23 Health and Safety • Policy 25 Community Wealth Building • Policy 26 Business and Industry • Policy 29 Rural Development Aberdeenshire Council's LDP (2023): • Policy C2 Renewable Energy • Policy PR2 Reserving and Protecting Important Development Sites
Impact assessment	**Volume 1, Chapter 30: Socio-Economics** of the **EIA Report** has identified significant beneficial effects resulting from the Project and no significant adverse effects. No transboundary effects have been identified. It is expected that Major Beneficial (**Significant**) effects would result from the construction and O&M stages of the Project, as well as the delivery of a wide range of Minor Beneficial (**Not Significant**) and Moderate Beneficial (**Significant**) effects. It is noted that some Minor Adverse (**Not Significant**) and Moderate Adverse (**Not Significant**) effects would also occur. Beneficial effects are expected to be experienced by: • the local and wider Scottish economy; • the local area having the necessary workers to accommodate the Projects need; • the Project generating a demand for goods and services which would stimulate the economy; • the number of jobs created; and • how the Project would act as a core employer that can aid in the strengthening of local communities and their identity. The socio-economic consequences of decommissioning are complex to foresee as they will depend on a supply chain which could have dedicated services for each stage of WTG disassembly provided from local or international hubs with effects for Scapa or other ports dependent on where they are positioned in the supply chain. For these reasons, the socio-economic consequences of decommissioning are not assessed in more detail than to suggest that they are likely to be positive for the decommissioning port due to the intrinsic commercial opportunity this activity presents. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** confirms that no secondary environmental effects arise from socio-economic impacts. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identified the Project would deliver significant beneficial socio-economic effects in terms of providing economic opportunities and employment. These are

	Policy assessment
	accompanied by some adverse cumulative effects arising from potential changes in economic returns from loss of agricultural production, residential amenity, and changes to visitor experience.
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** which relate to socio-economics are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, the implementation of a **Social and Economic Action Plan** (**SEAP**), adherence to the Project's Supply Chain Development Statement (SCDS) in relation to the use of a local workforce and supply chains, communication of working schedules to avoid and minimise disruption to local communities, and the use of a Fisheries Mitigation, Monitoring and Communication Plan (**FMMCP**) to ensure local communities are engaged with and supported. The following environmental measures are relevant to this aspect: M-219, M-222, M-224, M-225, M-226, M-227 and M-288.
Planning assessment	Relevant policies require development proposals to maximise net economic benefits, contribute to community wealth building and minimise adverse socio-economic impacts. The Project would create significant socio-economic beneficial effects through job creation from demand for labour and activity in supply chains locally and in the wider region over the 12 year phased construction and 35 year operational stage. A subsequent decommissioning stage is also expected to generate further employment opportunities in Scotland that could, to some degree, be filled by local people. 1,250 full-time equivalents (FTEs) jobs would be created over the construction and O&M stages of the Project. It is identified that, of the overall total of 1,250 jobs representing Project employment, approximately 805 (65%) jobs are in manufacturing, fabrication and installation with 510 (41%) at or near a port and 295 (24%) in the wider supply chain across Scotland. The remaining 445 (35%) is the average level of operational jobs that arises during the 12 year construction stage. The Project will generate additional economic activity from expenditure along with increased employment, known as Gross Value Added (GVA). The level of GVA in Scotland generated by the Project is an average of £121.2m annually over the construction period and continues at £99.0m annually during the operational period. Beneficial employment effects are anticipated to be concentrated and sustained, bringing employment stability in a context of uncertainty in relation to jobs in the oil and gas sector. The construction stage includes appreciable employment at a range of ports in Scotland and work elsewhere in the associated supply chains. The O&M stage is anticipated to deliver a higher level of employment with enduring socio-economic benefits, improving workforce resilience and support. During the O&M stage, long-term jobs at ports may provide structural benefits and economic stability for communities, particularly where there are areas of deprivation such as within Peterhead and Fraserburgh. The use of land and marine areas experiences some disruption with minor impacts expected in the agriculture, shipping and commercial fishing sectors. Embedded measures are included that reduce adverse effects and enhance positive socio-economic outcomes, including the long term benefits to communities experiencing transition with growth in the offshore wind sector offsetting the decline in oil and gas industries.

	Policy assessment
	Finally, the Project has developed and will implement a Socio-economic Action Plan for the Project, which would outline the steps the Project would take to maximise net economic benefits and contribute to community wealth building in accordance with planning policy requirements. Within NPF4, Policy 11 - Energy places the onus on projects, and thereby applicants, to "maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities". This means it is for the Applicant themselves to identify and propose ways in which their development proposals can maximise net economic benefits and contribute to community wealth building, as set out in the SEAP which is submitted in support of the consenting applications (onshore and offshore) for the Project. The SEAP also responds to relevant requirements and expectations outlined in Aberdeenshire Council's Energy Developments Community Wealth Building Charter, which itself seeks to address relevant NPF4 policies. The SEAP therefore outlines a suite of evidence-based actions and commitments which the Project will adopt to maximise net economic benefits and contribute to community wealth building. This Action Plan would be able to be kept up to date and evolve with the changing socio-economic situation, demonstrating the Project's commitment to providing positive socio-economic benefits that are felt at a local level. The socio-economic benefits that would be generated over the lifetime of the Project could help to reduce inequalities in the local area. Overall, the Project would result in a wide range of Beneficial (**Significant**) residual effects. The planning assessment concludes that the Project would be in accordance with policies 1 Tackling the Climate and Nature Crises, 3 Biodiversity, 7 Historic Assets and Places, 9 Brownfield, vacant and derelict land and empty buildings, 11 Energy, 23 Health and Safety, 25 Community Wealth Building , 26 Business and Industry, 29 Rural Development of the NPF4 and policies C2 and PR2 of Aberdeenshire Council's LDP, due to the significant benefits the Project would bring in terms of positive socio-economic effects. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

7. Planning Balance and Conclusions

7.1 Introduction

7.1.1.1 This section balances the technical assessment, policy compliance review and the environmental, social and economic considerations associated with the onshore elements of the Project. It draws together the evidence presented across the relevant onshore chapters and the whole Project chapters of the EIA Report, the embedded environmental measures secured through the Commitments Register, and the Project's assessment against the relevant policies of NPF4 and Aberdeenshire Council's LDP. The section concludes the Planning Statement by balancing the likely significant effects arising from the Project, with the Project's strategic importance and contribution to national climate objectives.

7.2 Planning considerations

7.2.1.1 Across all technical EIA Report chapters the Project has been shown to be well sited, sensitively designed and supported by a suite of embedded environmental measures, where necessary. The planning assessment of the various environmental aspects, as set out in **Section 6.3** above, confirms that all EIA technical aspect chapters conclude residual effects to be **Not Significant**, with the exception of **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report**, which is discussed further in **Section 7.2.2**.

7.2.1.2 Beneficial effects have been concluded within **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report**, with these often being assessed as **Significant**. This is due to the significant contribution of renewable electricity generation by the Project over its lifetime, and it being expected to offset its lifecycle emissions after 7.5 years of its operational life, with a carbon saving of 1,614,670 tCO_2e/year. Therefore, for the majority (27.5 years) of the Project's O&M stage, carbon savings would be provided.

7.2.1.3 Additionally, **Volume 1, Chapter 30: Socio-Economics** of the **EIA Report** identified an overall Beneficial (**Significant**) residual effect of the Project, due to the many and multi-faceted benefits generated, through helping to grow the local economy and providing employment opportunities. Whilst a detailed assessment of the Project's decommissioning stage is not provided within this chapter, it is expected that any Decommissioning Plan prepared would provide beneficial socio-economic associated effects.

7.2.1.4 In relation to planning considerations, the EIA Report has predominantly concluded that, with the exception of certain residual effects noted in **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report**, the Project is not expected to have any significant adverse residual effects. As outlined below, the residual adverse effects upon landscape and visual receptors are not sufficient to outweigh the wider benefits of the Project.

7.2.2 Landscape and visual acceptability

7.2.2.1 As detailed within **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report**, the Project's Landscape and Visual Impact Assessment (LVIA) has been undertaken in accordance with relevant legislation, consultation, and national and local planning policy, as well as IEMA guidance and the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The LVIA assessment has considered the effects arising from the Project during construction and O&M stages of all onshore elements and decommissioning of the onshore substations to determine the level of effect and whether this is significant.

7.2.2.2 Consistent with NPF4 Policy 4, 11 and relevant LDP policies, the Project has been designed and sited to minimise the potential effects upon landscape and visual receptors. Embedded environmental measures, including those set out in the **OLAS**, have been incorporated into the Project's design to reduce adverse effects as far as reasonably practicable, including:

- indicative landscape design plans;
- advance planting;
- retention of trees and hedgerows where possible;
- minimisation of construction working widths;
- use of underground export cables and trenchless crossing techniques; and
- plans for landscape maintenance and reinstatement.

7.2.2.3 Where detailed siting and implementation of environmental measures cannot be secured pre-consent, it is expected that details will be required post-consent and secured by planning condition.

7.2.2.4 Through the implementation of environmental measures proposed within the **OLAS**, the level of effect is expected to reduce post-construction for some landscape and visual receptors and in some cases the effects are reduced to **Not Significant**. Where mitigation includes planting, effects are expected to further reduce with time during O&M as vegetation becomes more established. Moreover, this leads to a neutral to beneficial effect for some landscape and visual receptors.

7.2.2.5 Despite the implementation of embedded environmental measures, some residual significant effects are identified during construction and O&M stages of all onshore elements and decommissioning of the onshore substations, including the potential for significant cumulative effects. However, the LVIA has taken a precautionary approach and has not considered the duration of the effect as a key factor in determining significance. This leads to certain effects during construction of all onshore elements and the decommissioning of the onshore substations to be determined **Significant**, although the nature of the effects are short to medium term in duration and therefore temporary. Additionally, the embedded environmental measures render some landscape and visual effects as neutral or beneficial, albeit significant, including during O&M of the onshore substations.

7.2.2.6 The Applicant is committed to delivering landscaping measures through practical means, such as planning conditions, and appropriate funding mechanisms. This approach ensures transparency and reflects the intention to enhance the landscape setting, wherever feasible. Given the need for and benefit of the Project, such as significant GHG, socio-economic and renewable energy benefits, the residual adverse landscape and visual effects are considered to be outweighed.

7.2.2.7 From a planning perspective, whilst some residual significant effects may remain, the Project has adopted appropriate design mitigation to minimise and contain such effects. The residual localised significant effects are therefore considered acceptable in line with Policy 11e) ii of NPF4.

7.2.2.8 In conclusion, from a landscape and visual perspective, the Project has been sited and designed appropriately to avoid adverse effects in the first instance, with mitigation proposed to reduce residual effects. Whilst significant effects remain, it is expected that certain mitigation measures associated with the implementation of the **OLAS** would reduce the level of effect and may remove some significant adverse effects, with remaining effects expected to improve with time, post-construction. Moreover, whilst the LVIA indicates certain significant effects during the construction of all onshore elements and during the decommissioning stage in relation to the onshore substations, from a planning perspective,

these residual effects are acceptable in policy terms when taking account of their localised, short to medium term and temporary nature.

7.2.2.9 As such, in respect of predicted landscape and visual impacts, the Project is considered to accord with the relevant policies:

- NPF4 (2023):
  - Policy 1 Tackling Climate and Nature Crises;
  - Policy 4 Natural Places;
  - Policy 6 Forestry, Woodland and Trees;
  - Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings;
  - Policy 11 Energy;
  - Policy 14 Design, Quality and Place;
  - Policy 27 City, Towns, Local and Commercial Centres; and
  - Policy 29 Rural Development.
- Aberdeenshire Council's LDP (2023):
  - Policy P1 Layout, Siting and Design;
  - Policy E2 Landscape;
  - Policy E3 Forestry and Woodland;
  - Policy C2 Renewable Energy;
  - Policy R1 Special Rural Areas;
  - Policy R2 Development Proposals Elsewhere in the Countryside; and
  - Policy HE2 Protecting Historic, Cultural and Conservation Areas.

7.3 Planning balance

7.3.1.1 The lengths to which the Project has sought to minimise its potential adverse effects can be observed through the majority of identified potential adverse effects being Minor Adverse or lower and **Not Significant**. These adverse effects are easily outweighed by the local and national benefits the Project would provide. The EIA Report aspect chapters which identify such effects include:

- **Volume 1, Chapter 20: Water Resources and Flood Risk**;
- **Volume 1, Chapter 21: Air Quality**;
- **Volume 1, Chapter 22: Land Use**;
- **Volume 1, Chapter 23: Terrestrial Ecology and Ornithology**;
- **Volume 1, Chapter 24: Onshore Archaeology and Cultural Heritage**;
- **Volume 1, Chapter 25: Onshore Noise and Vibration**;
- **Volume 1, Chapter 26: Traffic and Transport**;
- **Volume 1, Chapter 28: Climate Resilience**; and

- **Volume 1, Chapter 31: Civil and Military Aviation**.

7.3.1.2 The Project has been designed to be in accordance with the relevant policies of NPF4, including policies 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 18, 20, 22, 23, 25, 25, 26 and 29, and Aberdeenshire Council's LDP policies R1, R2, P1, P2, P4, E1, E2, E3, C1, C2, C3, C4, HE1, HE2, RD1, PM1 and PR1. The considerably low level of effects expected to emerge upon the topic areas identified above, as a result of construction, O&M and decommissioning, ensures the Project is in accordance with the Scottish Government Draft Planning Guidance: Biodiversity (2023), the Flood Risk PAN (2015), Planning and Noise PAN (2011) and the following Aberdeenshire Council Planning Advice documents: PA2023-10: Securing Positive Effects for Biodiversity (2023); PA2023-17: Baseline Ecological Survey (2023); and PA2023-20: Trees and Development (2023).

7.3.1.3 The findings and recommendations of **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report** are discussed in detail in **Section 7.2.2 Landscape and Visual Acceptability** of this planning statement, in which the Project was found to be in accordance with the requirements of the identified relevant policies.

7.3.1.4 A wide range of socio-economic benefits are identified within **Volume 1, Chapter 30: Socio-Economics** of the **EIA Report**. The demand for local goods and services, provision of employment and business for private local suppliers and businesses, associated with the Project's construction, is expected to improve economic activity within the local area. The Project is therefore expected to give rise to **Significant** socio-economic benefits with any adverse effects identified as Negligible or Minor in nature and **Not Significant**. Furthermore, as identified within **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report**, Significant beneficial cumulative effects would occur from the Project and other development providing significant employment opportunities and economic benefits.

7.3.1.5 In addition to the Project's provision of up to 3GW of clean, renewable energy, **Significant** beneficial effects are anticipated in relation to GHG and the decarbonisation of Scotland and the UK's electricity network (as identified within **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report**). The Project is expected to offset its lifecycle emissions within 7.5 years of its operational life, with a carbon saving of 1,614,670 tCO2e/year, thus demonstrating the Project's significant contribution to renewable electricity generation and GHG reduction over its lifetime. The GHG and socio-economic effects expected to be generated by the Project are therefore in accordance with the relevant aspects of NPF4 policies 1, 2, 3, 7, 9, 11, 23, 25, 26 and 29 and policies C1, C2 and PR2 of the Aberdeenshire Council's LDP.

7.3.1.6 The Project is also supported by a NPP which provides a framework for the implementation of relevant enhancement measures in accordance with Policy 3 of the NPF4. In addition to the mitigation measures set out within the **Commitments Register** (see **Volume 3, Appendix 5.2** of the **EIA Report**), the NPP also helps to ensure the Project meets the requirements of the other NPF4 policies.

7.3.1.7 For the avoidance of doubt, the Project would deliver a range of significant benefits. Fundamentally, the Project would aid in the meeting of the following national aims by providing up to 3GW of offshore renewable energy:

- UK Government's Clean Power 2030 - aim for 43-50GW of offshore wind capacity by 2030, with a further target of 72-89GW of offshore wind capacity by 2035;
- Draft Energy Strategy and Just Transition Plan 2023 - aim for Scotland to hit at least 20GW of renewable electricity generation capacity by 2030; and

- Offshore Wind Policy Statement 2020 and Consultation and 2025 Update - aim of 40 GW of new offshore wind capacity by 2035-2040, highlighting a continued and future demand for offshore wind development.

7.3.1.8 In addition, as set out above, the requirement for the onshore infrastructure is established through NESO's HND and HND FUE publications, as well as the HND Implementation Plan. These documents collectively confirm the locational need for the proposed grid connection infrastructure, reiterating the need for the Project.

7.3.1.9 The Project would also aid in the strengthening of the FLOW supply chain and industry within Scotland, helping to ensure this industry can continue to grow and help play its part in meeting the energy demands of Scotland and wider UK. The Project would deliver significant benefits in terms of injecting money and investment into the local area and in a wider view, the Project could aid in the reduction of electricity prices as the electricity market becomes less reliant on expensive forms of energy generation. Furthermore, the Project would fundamentally support Scotland and the UK's electricity network transition away from GHG producing electricity generating methods. This helps to reduce the UK's contribution to climate change and overall helps to combat the ongoing climate crises.

7.4 Compliance with Statutory Duties

7.4.1.1 Whilst not specifically relating to the determination of the PPiP application by Aberdeenshire Council, more widely the Project is considered to be in accordance with the statutory duties set out under Schedule 8 of the Electricity Act 1989. The s.36 consent application includes all required information, including detailed plans and maps of the generating station and grid connection infrastructure, as set out in the accompanying EIA Report. In accordance with Schedule 9, the Project has had due regard to preserving natural beauty, conserving flora and fauna, and protecting sites of architectural, historic, and archaeological interest. Comprehensive environmental assessments have been undertaken, and appropriate mitigation measures have been incorporated to minimise adverse effects. Public consultation has been carried out in line with statutory requirements, and the Project design reflects best practice to ensure impacts are localised and mitigated wherever possible. Where objections or significant impacts have been identified, the Project has engaged transparently with stakeholders and statutory consultees, and the application is supported by evidence of compliance with procedural and financial obligations as required by Schedule 8.

7.4.1.2 The Project's landscape and design-led process has ensured the Project:

- maximises avoidance of woodland, key landscape features and settlements;
- fully undergrounds the onshore export cable corridor;
- embeds mitigation including woodland retention and landscaping strategies; and
- considers scale and form of above ground elements to minimise visual massing.

7.4.1.3 As such, the Project's design is understood to comply with NPF4 policies 4, 6, 9, 11, 14, 27 and 29 and Aberdeenshire Council's LDP policies P1, E2, E3, R1, R2 and HE2. In addition, as per Policy 11 of NPF4, the clear national-level benefits outweigh both significant residual landscape and visual effects, and any potential effects upon other aspect areas.

7.4.1.4 The Project has also demonstrated compliance with the other policies and guidance documents as noted in **paragraph 7.3.1.2** above and therefore would comply with the requirements of the NPF4 and Aberdeenshire Council's LDP.

7.5 Overall Conclusions

7.5.1.1 This Planning Statement demonstrates that the Project is supported by national and local planning policy, and is underpinned by a robust assessment of need, benefits, environmental effects, and policy compliance.

7.5.1.2 **Section 3** establishes the clear need for, and benefits of, the Project, highlighting its contribution to national and local climate and energy objectives, socio-economic growth, and the delivery of strategic renewable energy infrastructure. The Project will support Scotland's transition to net zero emissions and deliver significant economic and community benefits.

7.5.1.3 **Section 6** provides a detailed assessment of the Project against the relevant policies of NPF4 and Aberdeenshire Council's LDP. With the exception of certain residual significant landscape and visual effects, all other environmental effects are considered to be **Not Significant** following the application of embedded mitigation measures. The Project is considered to be in accordance with the relevant planning policies and material considerations.

7.5.1.4 **Section 7** balances these findings, concluding that whilst **Significant** Adverse effects related to landscape and visual receptors are anticipated, these are localised, temporary, and will reduce over time. The overall social, environmental and economic benefits of the Project, together with compliance with relevant policy requirements, are considered to outweigh any residual adverse effects. On this basis, the Project is considered to be acceptable in planning terms and accords with the relevant policies of NPF4 and Aberdeenshire Council's LDP, as well as other material considerations. Accordingly, a decision to grant PPiP for the Project would be in accordance with the Development Plan.

7.5.1.5 The Project is not considered to give rise to any policy non-compliance issues, and it is important to note that strategic-scale offshore wind and associated grid connections are National Developments. As such, the Project has secured in principle support from NPF4 with a presumption in favour of development. Significant weight should also be given to the renewable energy and GHG reduction benefits of the scheme, upon the delivery of the grid connection, as required by NPF4 Policies 1 and 11:

- NPF4 Policy 1 emphasises that '*significant weight will be given to the global climate and nature crises'.*
- NPF4 Policy 11 establishes in-principle support for renewable energy and states that '*significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets'*.

7.5.1.6 Furthermore, the PPiP application aligns with the relevant sustainable development principles identified in Aberdeenshire Council's LDP Policy C2. Whilst a limited number of significant effects have been identified, these are not considered to be unacceptable as per Policy 11 of the NPF4 and C2 of Aberdeenshire Council's LDP.

7.5.1.7 Overall, the Project receives strong support from the Development Plan (NPF4 and Aberdeenshire Council's LDP) and relevant material considerations and is therefore considered to be acceptable in planning terms. Accordingly, a decision to grant PPiP for the Project would be in accordance with the Development Plan and national policy.

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9. Glossary of terms and abbreviations

9.1 Abbreviations

Acronym	Definition
AMSC	Approval of Matters Specified in Conditions
AOD	Above Ordinance Datum
BPP	Bird Protection Plan
CAR	Controlled Activity Regulations
CMS	Construction Method Statement
CEMP	Construction Environmental Management Plan
CfD	Contracts for Difference
CPO	Compulsory Purchase Order
CTMP	Construction Traffic Management Plan
DAS	Design and Access Statement
DESNZ	Department for Energy Security and Net Zero
DWPA	Drinking Water Protection Area
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EIA Report	Environmental Impact Assessment Report
FLOW	Floating Offshore Wind
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FUE	Follow-up Exercise
FTE	Full-time Equivalents
GHG	Greenhouse Gas
GLVIA	Guidelines for Landscape and Visual Impact Assessment
GW	Gigawatt
GVA	Gross Value Added
GWDTE	Ground Water Dependent Terrestrial Ecosystems
HDD	Horizontal Directional Drilling

Acronym	Definition
HND	Holistic Network Design
IEF	Important Ecological Features
INTOG	Innovation and Targeted Oil and Gas
km	kilometres
KPI	Key Performance Indicators
LDP	Local Development Plan
LMP	Lighting Management Plan
LNCS	Local Nature Conservation Site
LVIA	Landscape and Visual Impact Assessment
MD-LOT	Marine Directorate – Licensing Operations Team
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MOD	Ministry of Defence
MW	Megawatt
NPP	Nature Positive Plan
NESO	National Electricity System Operator
nm	Nautical miles
NPF4	National Planning Framework 4
NPS	National Policy Statement
NVMP	Noise and Vibration Management Plan
OAA	Option Agreement Area
OFTO	Offshore Transmission Operator
OLAS	Outline Landscape and Architectural Strategy
O&M	Operation & Maintenance
PAC	Pre-Application Consultation
PAN	Planning Advice Notes
PETF	Peterhead Energy Transition Forum
PMP	Peat Management Plan
PPiP	Planning Permission in Principle

Acronym	Definition
PWS	Private Water Supply
s.36	Section 36
SCDS	Supply Chain Development Statement
SEAP	Socio-Economic Action Plan
SEPA	Scottish Environment Protection Agency
SMEs	Subject matter experts
SMP	Soil Management Plan
SPA	Special Protection Area
SPP	Species Protection Plan
SPR	ScottishPower Renewables
SSEN	Scottish and Southern Electricity Network
SuDS	Sustainable Urban Drainage Systems
TO	Transmission Operators
UK	United Kingdom
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
WTGs	Wind Turbine Generators

9.2 Glossary of terms

Term	Description / commentary (if applicable)
Aberdeenshire Council	One of 32 divisions of Scotland, designated as a Council area for the purposes of local government, covering Aberdeenshire.
Climate change	A long-term trend in the variation of the climate resulting from changes in the global atmospheric and ocean temperatures and affecting mean sea level, wave height, period and direction, wind speed and storm occurrence.
Climate Change Act	Legislation enacted in 2008 by the UK Parliament to establish a framework for the reduction of greenhouse gas, which includes a target for the year 2050 emissions, a system of carbon budgeting, establishing the Committee on Climate Change, carbon trading schemes and other provisions.

Term	Description / commentary (if applicable)
Cumulative Effects Assessment	Assessment of effects as a result of the incremental changes caused by other past, present and reasonably foreseeable human activities and natural processes together with the Project.
Decommissioning	The period during which a development and its associated processes are removed from active operation.
EIA Regulations	Terminology used in this EIA Report to refer to four sets of regulations: • The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017; • The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; • The Marine Works (Environmental Impact Assessment) Regulations 2007; and • The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed project or development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment Report (EIA Report)	The written output presenting the full findings of the EIA.
Impact	The changes resulting from an action.
Institute of Environmental Management and Assessment	International membership organisation for environment and sustainability professionals.
Likely significant effects	It is a requirement of the EIA Regulations to determine the likely significant effects of the Project on the environment which should relate to the level of an effect and the type of effect.
Marine Directive – Licensing Operations Teams	Formerly known as Marine Scotland – Licensing Operations Team, MD-LOT is the regulator for determining marine licence applications on behalf of the Scottish Ministers in the Scottish inshore region (between 0 and 12 nautical miles) under the Marine (Scotland) Act 2010, and in the Scottish offshore region (between 12 and 200 nautical miles) under the Marine and Coastal Access Act 2009.
Marine licence	Licence required for certain activities in the marine environment and granted under either the Marine and Coastal Access Act 2009 or the Marine (Scotland) Act 2010.
Marine Policy Statement (MPS)	The framework for preparing Marine Plans and taking decisions affecting the marine environment in the UK.
Marine Directorate	Civil service directorate for Scotland, which is responsible for the integrated management of Scotland's seas.

Term	Description / commentary (if applicable)
Mean High Water Springs (MHWS)	The average throughout a year of the heights of two successive high waters during those periods of 24 hours (approximately once a fortnight) when the tidal range is greatest.
Mean Low Water Springs (MLWS)	The average throughout a year of the heights of two successive low waters during those periods of 24-hours (approximately once a fortnight) when the tidal range is greatest.
National Planning Framework 4	The fourth National Planning Framework (NPF4) is a long term plan for Scotland looking to 2045. It guides spatial development, sets out national planning policies, designates national developments and highlights regional spatial priorities. It forms part of the statutory Development Plan.
National Policy Statements (NPS)	National Policy Statements are statutory documents published in accordance with the Planning Act 2008. They set out the UK government's policy on, and the national need for specific types of nationally significant infrastructure projects. NPSs relevant to energy generation include: • Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security & Net Zero, 2023a); • National Policy Statement for Renewable Energy (EN-3) (Department for Energy Security & Net Zero, 2023b); and • National Policy Statement for Electricity Networks Infrastructure (EN-5) (Department for Energy Security & Net Zero, 2023c).
NatureScot	Formerly known as Scottish Natural Heritage, NatureScot is a public body and government advisor responsible for Scotland's natural heritage, in particular for its natural, genetic and scenic diversity.
Offshore	Pertaining to the seaward side of MLWS, and typically in reference to locations some distance from the coast.
Offshore Wind Farm	An offshore wind farm is a group of wind turbines in the same location (offshore) in the sea which are used to produce electricity.
Onshore	Pertaining to the landward side of MLWS.
Option Agreement Area	Term for the wind farm site upon the seabed at a location specified in the Option Agreement between the Crown Estate Scotland and a developer. It is the agreement that allows the developer the rights to undertake such tests, survey and site investigations that do not entail the temporary or permanent installation of any works or structures on the seabed.
Plan Option	Term used for the seabed areas identified in the Sectoral Marine Plan for offshore wind development in the ScotWind leasing round.
Planning Permission in Principle	PPiP establishes the acceptability of a type of development or land use on a site without requiring a significant level of detail about the design and implementation of a development proposal. This approach is typically used for major development proposals to avoid the initial high costs of detailed design work and to retain design flexibility. A PPiP application only seeks initial consent for, as a minimum, a proposed land use and associated suite of high-level

Term	Description / commentary (if applicable)
	development parameters (including access from a public road) within a defined site boundary. All detailed design and implementation matters would be deferred to subsequent applications for Approval of Matters Specified in Conditions (AMSC).
Red Line Boundary	The Red Line Boundary is a geographical area within which the offshore wind farm; associated onshore and offshore infrastructure will be located. It represents the boundary identified for the relevant planning and consent applications.
Scoping Opinion	A Scoping Opinion is adopted by the Planning Authority and Scottish Ministers for a proposed project.
Scoping Report	A report that presents the findings of an initial stage in the Environmental Impact Assessment process.
Scottish Government Marine Directorate (formerly Marine Scotland)	Civil service directorate for Scotland, which is responsible for the integrated management of Scotland's seas.
Scottish Ministers	The devolved government of Scotland.
ScottishPower Renewables UK Limited	Part of the Iberdrola group and 100% owner of MarramWind Limited.
Section 36 Consent	Consent that can be granted under section 36 of the Electricity Act 1989 for the construction or extension, and operation, of an electricity station.
Special Protection Area (SPA)	Sites designated under EU Directive (79/409/EEC) to protect habitats of migratory birds and certain threatened birds under the Birds Directive.
Statutory stakeholder	A stakeholder who must be given opportunity to engage with the Project as the Project design develops, as required under the relevant consenting regime(s).
Sustainability	The principle that the environment should be protected in such a condition and to such a degree that ensures new development meets the needs of the present without compromising the ability of future generations to meet their own needs.
The Applicant	MarramWind Limited.
The Project	The MarramWind Offshore Wind Farm is a proposed floating offshore wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW).
United Kingdom	The United Kingdom of Great Britain and Northern Ireland, comprising England, Scotland, Wales and Northern Ireland.

Appendix A Key Considerations for Conditions

Condition Theme	Details
Phasing Plan	Plan to outline the phasing of all construction works which the discharge of all other conditions should link to. Should the phasing of development require to be amended or updated then a revised phasing plan would be submitted for the written approval of the Planning Authority. Proposed condition phrasing: *A Phasing Plan outlining details of the phasing of all construction works and operational arrangements should be submitted to the Planning Authority for approval. Thereafter, the development shall be undertaken in accordance with the approved Phasing Plan. The commencement of development of works related to any phase of development shall not begin until such time as all of the relevant conditions pertaining to that phase of the development have been discharged as referred to within this planning permission.*
Landfall(s)	Two landfalls have been included in the application and until such time as the Project is able to confirm all infrastructure required, the ability to use both landfalls must be retained.
Construction and temporary works	It is expected that some temporary works may be required for specific phases. In line with the Phasing Plan, the detail of required works per phase will be included in a Phased Construction and Temporary Works Schedule.
Detailed Design	Details of the layout, siting, external appearance, finishing materials and landscaping of the extent of development proposed and corresponding to a defined phase or phases as set out in the Phasing Plan. Once approved for the first phase, the detailed design in respect of later phases would be submitted for re-approval. This should include the following: • Landfall(s); • Onshore substations; • Onshore export cable corridor; • Temporary construction compounds; • Access and haul roads; • Walls, fences and other means of enclosure; • Lighting; and • Details of the access visibility splays for any temporary construction access junctions onto the public highway.
Landscaping	Landscaping for each phase must relate to the development proposed in that phase, consequently all details cannot be confirmed upfront. It is expected that a phased landscaping scheme relating to the onshore substation site will be implemented in accordance with each phase of development. The scheme will include: • Details of the existing landscape features and vegetation to be retained; • Consideration of opportunities to provide strategic landscaping which mitigates the landscape and visual impact of the development; • The locations of new trees, shrubs, hedges and grassed areas;

Condition Theme	Details
	• A schedule of planting including species, plant sizes and proposed numbers and density; • A programme for the completion and subsequent maintenance of the proposed landscaping; and • Timescales for the delivery of landscaping proposals.
Detailed Surveys & Assessments	Detailed surveys and assessments undertaken for the extent of development proposed and corresponding to a defined phase or phases to be set out in the Phasing Plan.
Access	Full details of the proposed means of access, including abnormal load access. In accordance with **Plate 2.2**, all roads and access routes are proposed to be constructed during Phase 1 of the Project to enable all required HDD works and ducting installation as part of that phase. Abnormal load access details will require to be confirmed per phase in accordance with the Phasing Plan.
Implementation and Environmental Plans	The current suite of outline implementation plans which support the consenting applications will, post-consent, be converted into detailed plans and it is expected that some of these will be secured under condition. The detailed plans will be project-wide or phase specific, or a combination of both, depending on the subject matter and this must be reflected in corresponding conditions. EIA mitigation measures will be delivered through a series of plans, as outlined in the accompanying Commitments Register (see **Volume 3, Appendix 5.2** of the **EIA Report**).
Drainage and Flooding	Drainage and flooding mitigation arrangements for each phase must relate to the development proposed in that phase so all details cannot be confirmed upfront.
Biodiversity and Tree Planting	As detailed within **Volume 4: Outline Landscape and Architectural Strategy** of the EIA Report and **Nature Positive Plan**, it is expected that the offsite planting required in the onshore substation zone and other biodiversity enhancements will be delivered on a phased basis in line with the Phasing Plan.

MarramWind