

# Cambushinnie 400kV Substation Haul Track:

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## Planning Statement

June 2025

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# 1. Introduction and Overview

## 1.1 Introduction

- 1.1.1 Scottish Hydro Electric Transmission plc ('the Applicant'), operating and known as Scottish and Southern Electricity Networks Transmission ('SSEN Transmission'), has submitted a full major planning application, under the Town and Country Planning (Scotland) Act 1997 (as amended), for planning permission for a haul track, with ancillary works, at land approximately 3 km east of the existing Braco West Substation and approximately 50 m south of Braco Village, routing between the A822 and the existing access track to Braco West Substation ('the Proposed Development'). The Proposed Development is known as the Cambushinnie haul track. In this Planning Statement, 'the Applicant' and 'SSEN Transmission' are used interchangeably unless the context requires otherwise.
- 1.1.2 The Proposed Development is required to enable the construction of the proposed Cambushinnie 400 kV substation, and associated development, which is proposed as a result of the Scottish and UK Government's Net Zero climate change targets and associated guidance which result in significant increases in renewable generation, requiring greater capacity across the UK grid. As such, significant investment in new transmission network infrastructure to transport renewable energy and reinforce the network is required and is a priority. As part of this UK network reinforcement, the Applicant is proposing to upgrade the existing Beaulay-Denny 275 kV circuit to 400 kV, to mirror the ratings of the existing circuit which runs along the route. The upgrade can make use of the existing overhead line (OHL) infrastructure but requires alterations and additions to be made to the associated substations along the route at Beaulay, Fasnakyle, Fort Augustus, Tummel, Errochty, Kinardochy and Braco West. Works are required to varying degrees at each of these locations and will be subject to differing consenting types and timescales.
- 1.1.3 The energy regulator, Ofgem, approved the need for these upgrade projects as part of its Accelerated Strategic Transmission Investment (ASTI) framework decision. The Beaulay-Denny 400 KV project, alongside several other major network upgrades planned in the north of Scotland, forms part of a Great Britain wide programme of works that are required to meet UK and Scottish Government energy targets. There is a strong expectation from Scottish and UK Government and Ofgem that these projects will be delivered by 2030. Specifically, these projects are needed to deliver the Government's 2030 renewable targets as set within the British Energy Security Strategy (BESS) (April 2022).
- 1.1.4 SSEN Transmission has a licence obligation to invest in its existing assets to maintain network health and conditions, thereby, improving operational flexibility and resilience.
- 1.1.5 This Planning Statement considers the case for approval of the haul track in land use planning policy terms at the national (National Planning Framework 4 (NPF4)) and local (Perth and Kinross Council) level, with reference to the Development Plan and national planning and energy policy which supports the delivery of electricity infrastructure that will assist in the delivery of the Government's legally binding 'net zero' commitments and will ensure security of supply to customers.

## 1.2 Site Location and Description

1.2.1 The Site is located approximately 3 km east of the existing Braco West Substation and 50 m south of Braco village. The Proposed Development would route between the A822 and the existing access track to Braco West Substation to the south of Braco. From the A822, the track crosses agricultural fields, and Keir Burn, before crossing the B8033 adjacent to where the route heads west. Thereafter, the track routes from the B8033 across agricultural fields and a Christmas tree plantation to where it adjoins the existing access track to the existing Braco West Substation approximately 60 m north of Gamekeepers Cottage.

1.2.2 The route of the haul track extends for approximately 1.2 km.

1.2.3 A Site Location Plan is provided in Figure 2.1 of the EA Report.

### **1.3 The Proposed Development**

1.3.1 The haul track is required to facilitate the construction of the proposed Cambushinnie 400 kV substation and associated development (subject to a separate planning application) which would form part of the wider UK transmission network reinforcement project to upgrade the existing Beaulieu-Denny 275 kV circuit to a 400 kV circuit.

1.3.2 The Proposed Development is the subject to a separate planning application to PKC due to its design programme differing from the associated proposed Cambushinnie 400 kV Substation.

1.3.3 The Proposed Development would be largely permanent, with the exception of the proposed bridge deck, and would remain in-situ for future substation maintenance requirements.

1.3.4 The Proposed Development comprises permanent and temporary works which are detailed in Chapter 2 of the Environmental Appraisal (EA) Report and summarised below for completeness.

#### **Permanent Works**

##### *Haul Track*

1.3.5 The haul track would be approximately 1.2 km in length and 6.5 m wide, between the A822 and the existing Braco West Substation. It would include a bellmouth junction at the A822, and would comprise of a mix of tarmac and Type 1 stone surfacing. At the end of construction of the associated substation and associated works a section of the tarmac surface will be stripped back to Type 1 stone surfacing at the request of an involved landowner.

1.3.6 Type 1 material would be brought to Site. Between the A822 and the B8033, the haul track would be on an embankment above the existing ground level, increasing in height in proximity to the bridge over Keir Burn. Where the haul track passes through a Christmas tree plantation to the west of the Site, a section of the haul track would be in a cutting, which would require excavation.

##### *Bridge Abutments*

1.3.7 A bridge would span Keir Burn; the bridge deck would be temporary but the abutments to support the bridge at either side of the burn would be permanent and constructed of concrete.

##### *Flood Relief Culverts*

1.3.8 Flood relief culverts along the haul track would be implemented to provide conveyance of flood waters through the haul track embankment to replicate the existing baseline. The current design anticipates the need for 56 flood relief culverts in eight clusters along the haul track. These comprises two circular 0.5 m diameter culverts, 12 square 1x 1 m box culverts and 42 square 0.5 m x 0.5 m box culverts.

*Riverbank Reinforcements*

- 1.3.9 To mitigate flood risk, riverbank reinforcements in the form of an existing flood embankment downstream of the haul track will be implemented. There would be no in-channel works or piling.

**Temporary Works**

- 1.3.10 The temporary components of the Proposed Development comprise, in summary:
- > Bridge Deck – temporary bridge deck to be removed and placed in storage for potential future use in emergencies if required post construction. The bridge would be approximately 48 m in length and 4.1 m in height from existing ground level to parapet;
  - > Bridge fabrication areas – three potential areas for bridge fabrication if it is required to fabricate on Site. Two areas to the south of the haul track, east and west of the burn and one to the north of the haul track, east of the burn;
  - > Crane pad areas – required for installation of the bridge and located within the identified fabrication areas. Formed of Type 1 stone and geogrid construction material brought to Site. Areas would be removed, following the construction of the proposed Cambushinnie 400 kV substation and associated development;
  - > Temporary Compounds – two temporary compounds will be required during the construction phase. One would be located adjacent to the A822 directly to the south of the haul track and required to enable haul track construction works – this would be decommissioned at the end of the construction phase. The other would be located west of the B8033 directly to the south of the haul track and would be an access control compound. This would include car/van parking, a welfare unit for security, Heavy Goods Vehicle (HGV) holding areas and room for transport turning. The compounds would be lit during construction hours in winter periods. This would be decommissioned at the end of the construction and operation phase of the Proposed Development;
  - > Topsoil Storage Areas – located adjacent to the two southern bridge fabrication areas, and one west of the access control compound;
  - > Vehicle Cleaning Point – located where the surface of the haul track changes from tarmacadam to unbound material, remaining in place during construction and operational phase of the Proposed Development;
  - > Vehicle Management – temporary access control barriers for vehicles. One would be where haul track meets the A822 and the other directly east of the access to the temporary access control compound. Access to the haul track would be gated upon operation. Temporary traffic management measures where the haul track meets the A822 and where it crosses the B8033 would be in place during construction and operation phases. Further traffic management would be installed as appropriate and would be confirmed in a Construction Traffic Management Plan (CTMP) prior to commencement of works;
  - > Acoustic Barriers - temporary acoustic barriers are identified to mitigate noise impacts to the properties at Loaning View and Gamekeepers Cottage;
  - > Temporary Culverts – in place during construction, located adjacent to the eastern temporary construction compound, to the north and south of the haul track and adjacent to the access control compound;
  - > Fencing – temporary fencing around work areas, offset by 5 m during the construction phase with additional temporary heras fencing around the two temporary compound areas;

- > Post Construction – all temporary construction areas would be reinstated which would form part of the contract obligations for the Principal Contractor, and would include removal of all temporary Site works.

### Construction

- 1.3.11 Construction activities would generally be undertaken during daytime periods. Working hours are proposed as 07.00 to 19.00 Monday to Friday, 08.00 to 13.00 Saturday, and no working on Sunday or Bank Holidays unless in exceptional circumstances. During the commissioning phase of the Proposed Development, there may be a requirement for 24 hour working, seven days a week and potential for out of hours ad-hoc working. These working hours would be subject to approval with Perth & Kinross Council.
- 1.3.12 It is currently anticipated that construction would take approximately 48 weeks (11 months).
- 1.3.13 Prior to the main construction of the haul track, initial mobilisations works will be required to gain access to the Site from the A822, to establish a temporary Site welfare area, and to install noise mitigation works.
- 1.3.14 A Construction Traffic Management Plan (CTMP) would be prepared to manage construction traffic. A Framework CTMP is provided in the EA Report, Appendix K - Transport Statement.

### Reinstatement

- 1.3.15 Following commissioning all temporary construction areas would be reinstated.
- 1.3.16 The Proposed Development would be permanent, with the exception of the proposed bridge deck which would be removed at the end of the associated proposed 400 kV substation and associated works construction period. The bridge deck would be reinstated for replacement of large infrastructure, as required. The bridge abutments would be permanent and remain in place.

## 1.4 The Statutory Framework

### The Electricity Act 1989

- 1.4.1 As the Transmission Licence holder in the North of Scotland, the Applicant has a duty under section 9(2) of the Electricity Act 1989 to facilitate competition in the generation and supply of electricity. The Applicant is obliged to offer non-discriminatory terms for connection to the transmission system both for new generation and for new sources of electricity demand.
- 1.4.2 The Applicant is also required under section 9(2) of the Electricity Act 1989 to ensure that the transmission system is developed and maintained in an economical, coordinated and efficient manner in the interests of existing and future electricity consumers.

### The Town & Country Planning (Scotland) Act 1997

- 1.4.3 The principal planning statute in Scotland is the Town and Country Planning Act (Scotland) 1997 ('the 1997 Act'), as amended by the Planning etc. (Scotland) Act 2006 and the Planning (Scotland) Act 2019.
- 1.4.4 Section 25 of the 1997 Act states that:  
  
*"Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise, to be made in accordance with that plan".*
- 1.4.5 Accordingly, the purpose of this Planning Statement is to provide an assessment of the Proposed Development in the context of relevant national and local planning and energy policies and other material considerations. As such, it is important to establish:

- > Is the development as proposed in accordance with the Development Plan policies?;
- > If not, are there material considerations that determine a decision should be made contrary to the Development Plan? Or do material matters further support the position that the Proposed Development should be approved?

1.4.6 In answering these questions consideration is given to whether:

- > the proposal is in the national interest;
- > there is an identifiable need for the Proposed Development;
- > the proposal contributes positively to national or local policy priorities; and
- > the environmental effects of the Proposed Development would be acceptable when considered against the Development Plan policy framework and material considerations.

1.4.7 The planning application is supported by an **Environmental Appraisal Report** (EA Report) which examines the environmental effects of the Proposed Development.

## 1.5 Key Facts

1.5.1 Key facts relevant to this application are:

- > The Proposed Development is required to enable the construction of the proposed Cambushinnie 400 kV substation which has been identified as a National Development (ND) under the provisions of NPF4, ND3 under the class of development noted at (c) as *“new and/or upgraded infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations”*.
- > The Proposed Development will facilitate the construction of a key component of a critical expansion of the transmission network to enable renewable connections and transmission of energy to the wider GB network. ND3 supports renewable electricity generation, repowering, and expansion of the electricity grid. The Socio-economic assessments as part of a wider ‘needs case’ form an integral part of the justification for development of Scotland’s ‘Strategic Renewable Electricity Generation and Transmission Infrastructure.’ As noted, this infrastructure is required to construct the Cambushinnie 400 kV substation which designated as a National Development and explicitly supported by NPF4 under the provisions set out in Policy 11(a)(ii) (Energy).
- > The Statement of Need for the Proposed Development as contained in NPF4 is as follows:

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

*The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions.*



*Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience across Scotland”.*

- > The Proposed Development will facilitate capturing renewable energy potential in this area as well as delivering wider social and economic benefits by virtue of forming a critical component to enabling critical grid reinforcement and expansion on the ground.
- > The Proposed Development will enable the delivery of a nationally important network and grid infrastructure required to deliver the Government’s legally binding targets for net zero emissions and renewable energy electricity generation targets and policy objectives.
- > The Proposed Development will be delivered in such a way that it is environmentally acceptable and will include a co-ordinated scheme of environmental mitigation to ensure the long-term protection of the local and wider environment and to deliver development which is sustainable.

## 1.6 Structure of Planning Statement

- 1.6.1 This Planning Statement seeks to address the pertinent planning policy matters relevant to the determination of the application, to aid decision makers in their assessment and conclusions on the proposal.
- 1.6.2 This Planning Statement provides an assessment of the Proposed Development against relevant policy provisions and the statutory Development Plan. The appraisal also highlights where there are incompatibilities between national planning policies in NPF4 and those of the Perth & Kinross Local Development Plan 2 (PKLDP2) (November 2019).
- 1.6.3 This Statement is structured as follows:
  - > **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework and includes reference to the Scottish Government’s Draft Energy Strategy and Just Transition Plan;
  - > **Chapter 3** sets out the benefits of the Proposed Development;
  - > **Chapter 4** appraises the Proposed Development against the most up to date element of the Development Plan, namely the relevant provisions of NPF4;
  - > **Chapter 5** appraises the Proposed Development against the relevant provisions of the PKCLDP2 and related guidance; and
  - > **Chapter 6** examines the planning balance and presents overall conclusions.



## 2. The Renewable Energy Policy & Legislative Framework

### 2.1 Introduction

- 2.1.1 This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions (GHG) reduction law is based. This underpins what can be termed the need case for renewable energy and associated transmission infrastructure from which the Proposed Development can draw a high level of support.
- 2.1.2 The Proposed Development requires to be considered against a background of material UK and Scottish Government energy and climate policy and legislative provisions, as well as national planning policy and advice.
- 2.1.3 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.
- 2.1.4 The Proposed Development, enabling grid, and increasing capacity and security of supply, would make a valuable contribution to help Scotland and the UK meet its renewable energy and electricity production targets, while supporting emissions reduction to combat climate change in the current Climate Emergency.
- 2.1.5 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out. This is followed by reference to key UK level statutory and policy provisions and then a detailed description of relevant Scottish Government statutory and policy provisions is set out.

### 2.2 International Commitments

#### The Paris Agreement (2015)

- 2.2.1 In December 2015, 196 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference (COP21). The Paris Agreement within the United Nations Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C.
- 2.2.2 It is clear that moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links to the Climate Change Committee's (CCC) advice to both the UK and Scottish Governments on 'net zero' targets which have now, at both the UK and Scottish levels, been translated into new legislative provisions and targets for both 2045 (Scotland) and 2050 (UK).
- 2.2.3 The Paris Agreement does not itself represent Government policy in the UK or Scotland. However, the purpose of domestic and renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

### United Nations - Intergovernmental Panel on Climate Change

- 2.2.4 The Intergovernmental Panel on Climate Change (IPCC) is the United Nations Body for assessing the science related to climate change.
- 2.2.5 The IPCC prepares comprehensive assessment reports about the state of scientific, technical, and socio-economic knowledge on climate change, its impacts and future risks and options for reducing the rate at which climate change is taking place. IPCC reports are commissioned by the worlds' Governments and are an agreed basis for COP<sup>1</sup> negotiations.
- 2.2.6 The IPCC's Special Report on Warming of 1.5°C, published in 2018, was a key piece of evidence for the CCC's recommendation to the UK Government for a 2050 net zero greenhouse gas emission target. The IPCC's reports since 2018 have provided an up-to-date estimate of how close global temperatures are to 1.5°C of warming above pre-industrial levels and the remaining volume of global cumulative carbon dioxide that could be emitted to be consistent with keeping global warming below any particular threshold (such as the 1.5°C and 2°C levels referred to in the Paris Agreement).
- 2.2.7 The IPCC's 6th Assessment Report was published in March 2023. The Summary for Policymakers Report<sup>2</sup> at page 10 states that it is likely that warming will exceed 1.5°C during the 21<sup>st</sup> Century and make it harder to limit warming to 2°C. It states (page 12):
- 2.2.8 *"Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (high confidence). Deep, rapid and sustained reductions in greenhouse gas emissions would lead to a discernible slowdown in global warming within around two decades, and also to discernible changes in atmospheric composition within a few years (high confidence)".*
- 2.2.9 Page 24 of the Summary states *"There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence)".*

### COP 28, Dubai 2023

- 2.2.10 The United Nations Climate Change Conference (Conference of the Parties - COP28) closed on 13 December 2023. The UN press release of the same date states that the agreement reached *"Signals the 'beginning of the end' of the fossil fuel era by laying the ground for swift, just and equitable transition, underpinned by deep emissions cuts and scaled up finance."*
- 2.2.11 The statement adds:
- "The stocktake recognises the science that indicates global greenhouse gas emissions need to be cut 43% by 2030, compared to 2019 levels, to limit global warming to 1.5°C. But it notes parties are off track when it comes to meeting their Paris Agreement goals.*
- The stocktake calls on parties to take actions towards achieving, at a global scale, a tripling of renewable energy capacity and doubling of energy efficiency improvements by 2030. The list also includes accelerating efforts towards the phase down of unabated coal power, phasing out inefficient fossil fuel subsidies, and other measures that drive the transition away from fossil fuels in energy systems, in a just, orderly and equitable manner, with developed countries continuing to take the lead."* (underlining added)

### UN Emissions Gap Report (2024)

- 2.2.12 The UN Emissions Gap Report (October 2024) and its 'key messages' summary provides the annual independent science-based assessment of the gap between the pledged GHG)

<sup>1</sup> United Nations Framework Convention on Climate Change, Conference of the Parties (COP).

<sup>2</sup> A Summary of the main 6<sup>th</sup> Assessment Report.

reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.

- 2.2.13 The Report states that against the background of GHG emissions reaching new highs and climate impacts intensifying globally, nations are preparing what are termed Nationally Determined Contributions (NDCs) for submission in early 2025, ahead of COP30 in Brazil.
- 2.2.14 The Report states that in order to avoid the present trajectory of temperature increase far beyond 2°C over the course of this century:
- 2.2.15 *“Nations must use COP29 in Baku, Azerbaijan, as the launch pad to increase ambition and ensure the NDCs collectively promise to almost halve greenhouse gas emissions by 2030. They must then follow up with rapid delivery of commitments, building on actions taken now. If they do not do so, the Paris Agreement target of 1.5°C will be gone within a few years and the 2°C target will be in danger”.*
- 2.2.16 The Report states (on page 1) that there must be *“unprecedented cuts to greenhouse gas emissions by 2030 to keep 1.5°C alive”*.
- 2.2.17 In order to put the challenge of emissions reduction in context, the key messages document (on page 2), sets out that if only current NDCs are implemented and no further ambition is shown in the new pledges to come, *“the best we could expect to achieve is catastrophic global warming of up to 2.6°C over the course of the century”*.

#### **COP 29, Baku 2024**

- 2.2.18 The 29th UN Climate Conference hosted in Baku, Azerbaijan concluded on November 24 2024. New financial goals at COP 29 will build on the significant strides on global action at COP 27, which agreed a historic Loss and Damage Fund, and COP 28, which delivered a global agreement to transition away from fossil fuels in energy systems in a swift and fair manner as well as triple renewable energy and boost climate resilience. Unlike COP 27 and 28 however, COP 29 reached an agreement on carbon markets which will help countries deliver their respective climate plans on a quicker and cheaper basis, as well as make faster progress in halving global emissions.

## **2.3 UK Climate Change & Energy Legislation & Policy**

### **The Climate Emergency**

- 2.3.1 A critical part of the response to the challenge of climate change was the Climate Emergency which was declared by the Scottish Government in April 2019 and by the UK Parliament in May 2019. The declaration of Climate Emergency needs to be viewed in the context in which it was declared (advice from the CCC) and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).

### **The Climate Change Act 2008 & Carbon Budgets**

- 2.3.2 The Climate Change Act 2008 (“the 2008 Act”) provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, secondary legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.
- 2.3.3 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.
- 2.3.4 The CCC has produced six four yearly carbon budgets, covering 2008 – 2037. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be

emitted over the five-year period as summarised in Table 2.1 below. Essentially, they are five yearly caps on emissions.

- 2.3.5 These legally binding ‘carbon budgets’ act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

**Table 2.1: Carbon Budgets and Progress<sup>3</sup>**

Budget	Carbon budget level	Reduction below 1990 levels	Progress on Budgetary Period
1 <sup>st</sup> carbon budget (2008 – 2012)	3,018 MtCO <sub>2</sub> e	26%	-27%
2 <sup>nd</sup> carbon budget (2013 – 2017)	2,782 MtCO <sub>2</sub> e	32%	-42%
3 <sup>rd</sup> carbon budget (2018 – 2022)	2,544 MtCO <sub>2</sub> e	38% by 2020	-50% <sup>4</sup>
4 <sup>th</sup> carbon budget (2023 – 2027)	1,950 MtCO <sub>2</sub> e	52% by 2025	n/a
5 <sup>th</sup> carbon budget (2028 – 2032)	1,725 MtCO <sub>2</sub> e	57% by 2030	n/a
6 <sup>th</sup> carbon budget (2033 – 2037)	965 MtCO <sub>2</sub> e	78% by 2035	n/a
7 <sup>th</sup> carbon budget (2038 – 2042)	535 MtCO <sub>2</sub> e	87% by 2040	n/a
Net Zero Target	100%	By 2050	

Source: CCC

- 2.3.6 The Seventh Carbon Budget (CB7) was published by the CCC in February 2025. The CCC’s recommended level for CB7, namely a limit on the UK’s GHG emissions over the five-year period 2038 to 2042 is 535 including emissions from international aviation and shipping.

- 2.3.7 Page 12 of the CB7 states:

*“By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture.”*

- 2.3.8 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that *“this requires twice as much electricity as today by 2040”*.

- 2.3.9 In relation to the electricity grid, CB7 states (page 106) that in relation to the increase in renewable technology deployment that *“these technologies need to be accompanied by investment in network infrastructure, including rapidly building out the transmission grid and speeding up the grid connection process, which currently poses a barrier to electrifying industry.... Steep growth is needed from today out to 2040.”*

#### **The UK Energy White Paper (December 2020)**

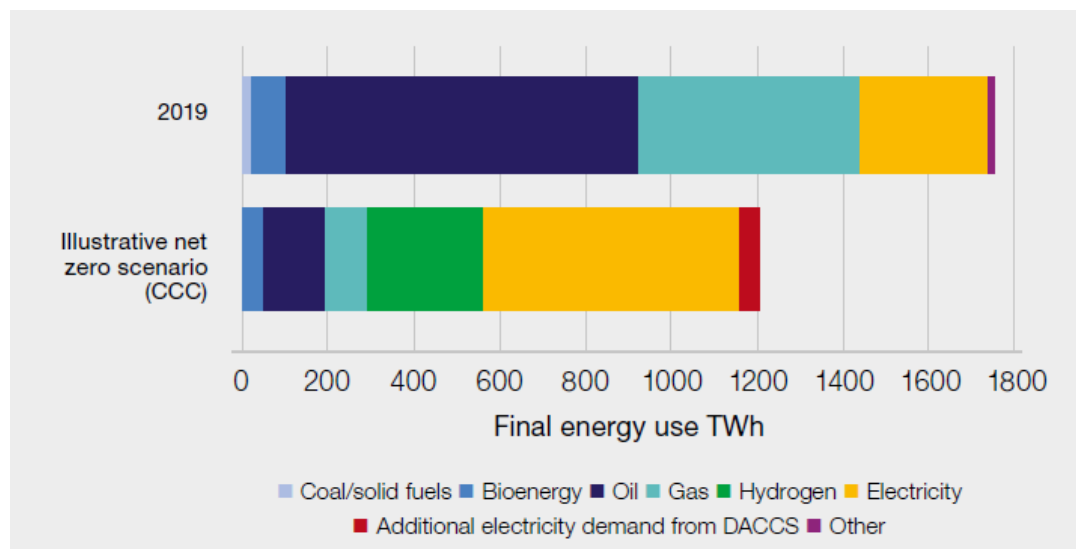
- 2.3.10 The Energy White Paper ‘Powering our Net Zero Future’, published on 14 December 2020, represents a sea change in UK policy, and highlights the importance of renewable electricity.

<sup>3</sup> Source: CCC.

<sup>4</sup> Confirmed by CCC in ‘Final Statement for the Third Carbon Budget’ May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

- 2.3.11 It sets out that “*electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050*”. A key objective is to “*accelerate the deployment of clean electricity generation through the 2020s*” (page 38).
- 2.3.12 Electricity demand is forecast to double out to 2050, which will “*require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target*” (page 42).
- 2.3.13 This anticipated growth of renewable electricity is illustrated in the graph below – **Figure 2.1.**

**Figure 2.1: Illustrative UK Final Energy Use in 2050<sup>5</sup>**



- 2.3.14 Whilst offshore renewables are expected to grow significantly, the White Paper also sets out that “*onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios*” (page 45).

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

- 2.3.15 The British Energy Security Strategy (“the Strategy”) was published by the UK Government on 7 April 2022. The Strategy focuses on energy supply and states that in the future nuclear will have an expanded role, and that renewables have an important role. The foreword states, *inter alia*:

*“this government will reverse decades of myopia and make the big call to lead again in a technology the UK was the first to pioneer, by investing massively in nuclear power....*

*Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables....*

*The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets. Indeed, without the renewables we are putting on the grid today, and the green levies that support them, energy bills would be higher than they are now. But now we need to be bolder in removing the red tape that holds back new clean energy developments and exploit the potential of all renewable technologies.”*

- 2.3.16 Reducing Scotland’s and the wider UK’s dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently

<sup>5</sup> Source: Energy White Paper page 9 (2020). Energy white paper: Powering our net zero future - GOV.UK



required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

- 2.3.17 The need for the Proposed Development and network reinforcements is underlined within the Strategy, which recognises the significant impact on the cost of living from rising gas prices and sets out a plan to increase the supply of electricity from zero-carbon British sources to deliver affordable, clean, and secure power in the long term.

**Climate Change Committee Report to UK Parliament (2024)**

- 2.3.18 The CCC published the report ‘Progress in Reducing Emissions 2024 Report to Parliament in July 2024 (“the CCC Report”). The Executive Summary (page 8) states:

*“the previous Government signalled the slowing of pace and reversed or delayed key policies. The new Government will have to act fast to hit the country’s commitments.*

*The cost of key low-carbon technologies is falling, creating an opportunity for the UK to boost investment, reclaim global climate leadership and enhance energy security by accelerating take-up. British-based renewable energy is the cheapest and fastest way to reduce vulnerability to volatile global fossil fuel markets. The faster we get off fossil fuels, the more secure we become.”*

- 2.3.19 The CCC Report makes it clear that urgent action is needed to get on track for the UK’s 2030 emissions reduction target. In this regard it states (page 8):

*“The UK has committed to reduce emissions in 2030 by 68% compared to 1990 levels, as its Nationally Determined Contribution (NDC) to the Paris Agreement. It is the first UK target set in line with Net Zero. Now only six years away, the country is not on track to hit this target despite a significant reduction in emissions in 2023. Much of the progress to date has come from phasing out coal generated electricity, with the last coal-fired power station closing later this year. We now need to rapidly reduce oil and gas use as well.”*

- 2.3.20 And further (page 9):

*“Our assessment is that only a third of the emissions reductions required to achieve the 2030 target are currently covered by credible plans. Action is needed across all sectors of the economy, with low carbon technologies becoming the norm.”*

- 2.3.21 The UK should now be in a phase of rapid investment and delivery, however the CCC notes in the CCC Report that all indicators for low carbon technology roll out are “off track, with rates needing to significantly ramp up.” In this regard in terms of renewable technologies it states (page 9):

- > Annual offshore wind installations must increase by at least three times;
- > Onshore wind installations will need to double; and
- > Solar installations must increase by five times.

- 2.3.22 Chapter 2 of the CCC Report confirms that the third Carbon Budget was met (covering the period 2018 to 2022), however “future carbon budgets will require an increase in the pace and breadth of decarbonisation. It is imperative that an ambitious path of emissions reduction is maintained towards Net Zero” (Page 33).

- 2.3.23 Section 2.3 of the CCC Report addresses emissions reductions required for future Carbon Budgets. Paragraph 2.3.1 states that:

*“emissions reductions across most sectors will need to significantly speed up to be on track to meet the UK’s climate targets in the 2030s, and therefore the long term target of Net Zero by 2050. Emissions reductions will need to outperform the legislated Fourth Carbon Budget for the UK to be on a sensible path to achieve its 2030 NDC, the Sixth Carbon Budget and Net Zero.”*

- 2.3.24 Chapter 3 of the CCC Report examines indicators of current delivery progress and at page 50 it references a number of key points including *inter alia*:

*“Required pace – substantial progress is needed on a range of key indicators over the rest of this decade, to get the UK on track to meet its 2030 emissions targets. Low carbon technologies need to quickly become the default options in many areas...”*

*Renewable energy capacity has been growing steadily. However, roll-out rates will need to increase, compared to those since the start of this decade, to deliver the capacity needed by the end of the decade. Annual installations of offshore wind will need to more than treble, onshore wind more than double and solar increase by a factor of five.”*

- 2.3.25 With regard to the Fourth Carbon Budget (2023-2027) it states (page 70) that although credible plans cover almost all of the emissions reductions required to meet it, *“this budget was set before the UK’s Net Zero target was legislated. The UK will need to reduce emissions by double the amount implied by the target to be on a sensible path to Net Zero....”*

- 2.3.26 With regard to the 2030 NDC and Sixth Carbon Budget (for the period 2023 to 2037) the CCC Report states that credible plans cover only around a third of emissions reductions needed to meet the UK’s 2030 NDC and a quarter of those needed to meet the Sixth Carbon Budget. It adds (page 70) *“that 2030 NDC is now only six years away. While our assessment of the policies and plans to deliver it has improved slightly, there remains significant risks to achieving these goals.”*

#### **Labour Government & Commitment to Renewables (2024)**

- 2.3.27 The recent UK Government change at Westminster and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to Net Zero. The Labour Party Manifesto states that it has *“a national mission for clean power by 2030”* and it explicitly states that this is achievable *“and should be prioritised”*. The Manifesto sees the clean energy transition as a huge opportunity to generate growth and also to tackle the cost-of-living crisis. This objective is set out as Labour’s *“second mission”* for the UK.

- 2.3.28 Energy policy is reserved to Westminster and although the Scottish Government has progressed its own energy policy in parallel with its full devolved authority over the planning system in Scotland, UK Government policy is an important material consideration.

#### **UK Government: Clean Power 2030 Action Plan (2024)**

- 2.3.29 In addition, a key new material consideration is the Clean Power 2030 Action Plan, issued by the Department for Energy Security and Net Zero (DESNZ) in December 2024. It sets out (page 9) that Britain needs to install *“clean sources of power at a pace never previously achieved”*.

- 2.3.30 It further adds (page 10):

*“clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals”.*

- 2.3.31 The document adds that *“Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also via the application of clean power in the buildings, transport and industry sectors... The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity”.*



- 2.3.32 Page 74 of the Action Plan states that “Meeting the renewable capacity set out in the DESNZ ‘clean power capacity range’ is achievable but will require deployment at a sharply accelerated scale and pace”.

## **2.4 Climate Change & Renewable Energy Policy: Scotland**

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

- 2.4.1 The Scottish Energy Strategy (SES) was published in December 2017. The SES preceded the important events and publications referred to above, but nevertheless, sets out that onshore wind is recognised as a key contributor to the delivery of renewable energy targets – specifically 50% energy from renewable sources to be attained by 2030. The SES did not and could not take account of what may be required in terms of additional renewable generation capacity to attain the new legally binding ‘net zero’ targets so it is out of date in that respect.
- 2.4.2 The SES refers to “Renewable and Low Carbon Solutions” as a strategic priority (page 41) and states *“we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets”*.

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

- 2.4.3 Against this backdrop, the Scottish Government has set legal obligations to decarbonise and reduce emissions. Most notably, the Scottish Government has a statutory target to achieve “net zero” by 2045. It is clear that to have any hope of achieving the net zero target, much needs to happen by 2030.
- 2.4.4 When it was enacted, the Climate Change (Scotland) Act 2009 set world leading GHG emissions reduction targets, including a target to reduce emissions by 80% by 2050. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the Climate Change (Scotland) Act 2009 to set the even more ambitious interim targets. However, the provisions setting out those interim targets were repealed by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, which replaced them with a system of targets based on carbon budgets which are to be set every five years. This is further referenced below.
- 2.4.5 The Cabinet Secretary for Wellbeing Economy, Net Zero and Energy made a Statement to the Scottish Parliament on 18 April 2024 with regard to the report to the Scottish Parliament prepared by the CCC, ‘Progress in reducing emissions in Scotland’ (March 2024). The Statement focussed on the implications the CCC report contained for Scottish emission reduction targets as set out in legislation, namely as set out in the Climate Change (Scotland) Act 2009.

### **CCC Report to Scottish Parliament – Progress in reducing emissions in Scotland (March 2024)**

- 2.4.6 The CCC produced a report to the Scottish Parliament entitled ‘Progress in reducing emissions in Scotland’ in March 2024. The related press release of the same date states that Scotland’s 2030 climate goals are no longer credible. It states:

*“Continued delays to the updated Climate Change Plan and further slippage in promised climate policies mean that the Climate Change Committee no longer believes that the Scottish Government will meet its statutory 2030 goal to reduce emissions by 75%. There is no comprehensive strategy for Scotland to decarbonise towards Net Zero.*

*The Scottish Government delayed its draft Climate Change Plan last year despite the 2030 target being only six years away. This has left a significant period without sufficient actions or policies to reach the target; the required acceleration in emissions reduction in Scotland is now beyond what is credible.”*

- 2.4.7 The main report (page 10) states that “*The Scottish Government should build on its high ambition and implement policies that enable the 75% emissions reduction target to be achieved at the earliest date possible.*”

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

- 2.4.8 On 5 September 2024 the Scottish Government introduced the Climate Change (Emission Reduction Targets) (Scotland) Bill to the Scottish Parliament. The Bill was passed on 5 November 2024 and became an Act on 22 November 2024. The Act repealed the annual and interim emissions reduction target framework that was established under the 2009 Act and establishes a carbon budget approach to target setting, with budgets to be set through secondary legislation using the latest advice from the CCC, to replace the concept of statutory annual and interim targets. The Act also makes provision for a new Climate Change Plan to be published that reflects the carbon budgets.
- 2.4.9 As explained, the Act followed advice from the CCC that Scotland’s interim emissions reduction target for 2030 could not be achieved. The Act does not change the existing statutory target of net zero emissions by 2045.

### **2.5 The Draft Energy Strategy & Just Transition Plan**

- 2.5.1 The Scottish Government published a new Draft ‘Energy Strategy and Just Transition Plan’ entitled ‘Delivering a fair and secure zero carbon energy system for Scotland’ on 10 January 2023. The new Strategy is to replace the one previously published in 2017. The consultation period ended in April 2023. As a draft document it can only be afforded limited weight. The draft document is however consistent with the adopted policy set out in NPF4 and the identification of the 2020s as a crucial decade for the large-scale delivery of renewable energy projects supporting urgent transition to net zero.
- 2.5.2 The Ministerial Foreword states:
- “The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generate economic opportunities, and builds a just transition...”*
- The delivery of this draft Energy Strategy and Just Transition Plan will reduce energy costs in the long term and reduce the likelihood of future energy cost crises....*
- It is also clear that as part of our response to the climate crisis we must reduce our dependence on oil and gas and that Scotland is well positioned to do so in a way that ensures we have sufficient, secure and affordable energy to meet our needs, to support economic growth and to capture sustainable export opportunities....*
- For all these reasons, this draft Strategy and Plan supports the fastest possible just transition for the oil and gas sector in order to secure a bright future for a revitalised North Sea energy sector focused on renewables.”*
- 2.5.3 The Foreword adds that the draft Strategy sets out key ambitions for Scotland’s energy future including:
- > More than 20 GW of additional renewable electricity on and offshore by 2030.
  - > Accelerated decarbonisation of domestic industry, transport and heat.
  - > Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe.
  - > Energy security through development of our own resources and additional energy storage.
  - > A just transition by maintaining or increasing employment in Scotland’s energy production sector against a decline in North Sea production.

- 2.5.4 The draft Strategy states (page 7, Executive Summary) that the vision for Scotland's energy system is:
- "...that by 2045 Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business. This will deliver maximum benefit for Scotland, enabling us to achieve a wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions.*
- In order to deliver that vision, this Strategy sets out clear policy positions and a route map of actions with a focus out to 2030".*
- 2.5.5 The draft Strategy specifically addresses energy networks (page 36) and states "Significant infrastructure investment in Scotland's transmission system is needed to ameliorate constraints and enable more renewable power to flow to centres of demand."
- 2.5.6 It states that National Grid has identified the requirement for over £21 billion of investment in British electricity transmission infrastructure to meet 2030 targets and that over half of this investment will involve Scottish transmission owners SPEN and SSEN Transmission (the Applicant).
- 2.5.7 The draft Strategy adds that: *"the Scottish Government is working closely with network companies to support timely delivery of this infrastructure"*.
- 2.5.8 Reference is made to the ambitious business plans of transmission businesses which *"reflect the scale and pace of delivery required to meet Scottish Government ambitions"*.
- 2.5.9 Chapter 5 of the Strategy refers to 'creating the conditions for a net zero energy system'. It states (page 125) that *"As we transition to a net zero energy system, renewables and other zero carbon technologies... will need to provide all the services required to ensure a secure energy system"*.
- 2.5.10 The Chapter goes on to reference in this regard energy markets and network regulation and with regard to network investment (page 126), it states that the Government is working closely with the network companies *"to support timely delivery of required electricity network infrastructure"*.
- 2.5.11 It further adds with regard to constraint costs that the Government will continue to work with National Grid Energy System Operator (ESO), transmission owners and Ofgem *"to explore opportunities to accelerate planned network investment to relieve constraints"*.
- 2.5.12 Therefore, a key aspect of the Energy Strategy in terms of network investment, is the need for speed of delivery of infrastructure to ensure not only that need can be met, but that there can be energy security and resilience within the wider energy system.

## **2.6 The Green Industrial Strategy**

- 2.6.1 The Scottish Government published a Green Industrial Strategy (GIS) in September 2024. The Executive Summary sets out the mission of the GIS, namely:
- "This Green Industrial Strategy's mission is to ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to net zero".*
- 2.6.2 The GIS sets out five opportunity areas for Scotland where identified strengths are most likely to lead to growth and the potential to grow Scotland's exports. The sectors relate to Scotland's wind economy, carbon capture and storage, supporting the green economy by way of professional and financial services, growing the hydrogen sector and establishing Scotland as a competitive centre for clean energy intensive industries of the future.
- 2.6.3 Point 4 of their "onshore wind" approach states "work with UK Government, Ofgem and the National ESO to ensure that the interests of Scotland are best represented. Markets, policies, and regulation affecting the electricity sector are largely reserved to the UK Government

under the UK Electricity Act (1989). We are working with the UK Government to enable a faster, more efficient, and strategic approach to designing and regulating the net zero energy system, in particular for accelerating grid connections and network build.”

2.6.4 Availability of grid connections is further referenced as a barrier to tackle to decarbonise industrial processes.

2.6.5 The Strategy makes plain that *“timely grid connections and strengthened grid infrastructure will be key to securing renewables project delivery and investor and supply chain confidence in Scotland.”*

2.6.6 It is clear therefore that the Government has objectives to support the delivery of grid expansion and strengthened grid infrastructure. This is not only critical towards aiding net zero targets but also help deliver the Government’s clear green industry mission.

## 2.7 Conclusions on the Renewable Energy Policy & legislative Framework

2.7.1 The Applicant’s position is that the Proposed Development is strongly supported by the renewable energy policy and legislative framework.

2.7.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper than before and it is essential that rapid progress is made through the 2020s, and beyond. The rate of emission reductions must increase otherwise the legally binding target of Net Zero by 2045 will not be met.

2.7.3 It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport.

2.7.4 Decisions through the planning system must be responsive to the climate change policy imperative. Decision makers can do this by affording significant weight to the energy policy objectives, articulated above, in the planning balance.

2.7.5 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a ‘green thread’ which ties a number of related policy matters together: namely the urgent challenge of net zero and the need to substantially increase renewable energy capacity.

2.7.6 Overall, the Draft Energy Strategy forms part of the new policy approach alongside NPF4. These documents confirm the Scottish Government’s policy objectives and related targets, reaffirming the crucial role that new electricity infrastructure will play in response to the climate crisis which is at the heart of all these policies.

2.7.7 By way of illustration, this was demonstrated recently in the decision by Scottish Ministers on 9<sup>th</sup> June 2025 to approve the Applicant’s Skye Reinforcement Overhead Line Project, in Highland, where it is stated in the Ministers’ Decision Letter at paragraph 137 that:

*“Scotland faces a real challenge in building an electricity grid which will allow Scotland to harvest and export its vast resources of clean energy. The Scottish Ministers recognised that to achieve the dual aims of maintaining a resilient electricity network for businesses and consumers and enabling renewable ambitions to be realised, the need for grid reinforcement is greater than ever. The installation, and keeping installed, of the proposed OHL would allow the Company to comply with its statutory duty to develop and maintain an efficient, coordinated, and economical system of electricity distribution and delivery and major electricity transmission system reinforcement”.*

2.7.8 Paragraph 138 continues further reinforcing the importance of energy and planning policies:

*“Scotland’s energy policies and planning policies are all material considerations when weighing up the proposed Development. NPF4 makes it clear that low carbon energy*

*deployment, maintaining security of electricity supply, and electricity system resilience remain a priority of the Scottish Government. These are matters which should be afforded significant weight in favour of the proposed Development. The Scottish Ministers conclude, for the reasons set out above, that the proposed Development is supported by Scottish Government policies”.*

## 3. The Benefits of the Proposed Development

### 3.1 The Benefits: Summary

3.1.1 This chapter summarises the benefits that would arise from the Proposed Development:

#### Renewable Energy Transmission

- > The Proposed Development will facilitate the construction of the proposed Cambushinnie 400 kV substation which will upgrade the existing Braco West substation to enable the Beauly to Denny OHL to operate at 400 kV and offer enhanced transmission and connection capacity. It will enable an essential link on this part of the grid network, facilitating renewable transmission and additional capacity support throughout the local and wider area.
- > SSEN Transmission has a licence obligation to invest in new assets to maintain and deliver network capacity. The Proposed Development represents a long-term approach in relation to planning for future transmission infrastructure requirements, particularly having regard to the targets fixed by the Scottish and UK Governments to achieve net zero; and,
- > The Proposed Development will enable the delivery of additional capacity on the transmission network for new renewable generation (which is defined as “essential infrastructure” in NPF4<sup>6</sup>). This is consistent with the core aims of NPF4 National Development 3 (page 103), which states *“Additional electricity generation from renewables and electricity capacity of scale is fundamental to achieving a Net Zero economy...”*.

#### Security of Supply

- > The British Energy Security Strategy has been referenced. It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.
- > With this context, the delivery of grid infrastructure improvements to deliver significant benefits to consumers through decarbonisation, security of supply and enhanced capacity to transmit renewable energy is clear.
- > The Proposed Development, if consented, would provide a valuable contribution to security of supply for Perth & Kinross, Scotland and for the wider Great Britain (GB) area, by ensuring that the new 400 kV substation at Cambushinnie can be constructed.

#### Economic & Community Socio -Economic Benefits / Local Supply Chain Opportunities

- > The Applicant has in place Sustainable Procurement Codes and Supplier Guidance to oblige suppliers and contractors to maximise local employment and economic gain and social benefits as a result of the investment in new energy infrastructure in their area and sets out which measures are to be put in place to maximise opportunities for local people and businesses close to the site and in the wider region.
- > A further obligation is that suppliers and contractors are expected to *“have in place education and employability programmes which promote the development of employee skills as well as local employment...”*

<sup>6</sup> NPF4 Annex F, page 148.

- > The Applicants guidance as a basic commitment in this regard requires 'decent work and economic growth' alongside addressing environmental obligations, with a key objective to ensure the economic value is shared with particular focus on local supply chains.
- > Notwithstanding that community benefit is not a material planning matter, the Applicant has an extensive community benefits programme (set out in detail on their website).

#### **Biodiversity Enhancement**

- > The greatest threat to biodiversity is climate change, and delivering an enhanced grid transmission network with enhanced capacity for renewable energy is a critical step to meet net zero.
- > The Proposed Development is consistent with the Applicant's commitment in all projects to deliver 10% biodiversity net gain.



## 4. Appraisal against NPF4

### 4.1 Introduction

4.1.1 NPF4 was approved by resolution of the Scottish Parliament on 11<sup>th</sup> January 2023 and came into force on 13<sup>th</sup> February 2023.

4.1.2 A Chief Planner's Letter was issued on 8<sup>th</sup> February 2023 entitled 'Transitional Arrangements for National Planning Framework 4'. It contains advice intended to support consistency in decision making ahead of new style Local Development Plans (LDPs) being in place.

4.1.3 Section 24 of the 1997 Act has been amended to provide that:

*"In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail".*

4.1.4 Included in this is where an LDP is silent on an issue that is now provided for in NPF4.

4.1.5 In relation to the Proposed Development, an assessment has been undertaken of relevant LDP policies against those of NPF4 and this is presented in Section 5 of this Planning Statement.

### 4.2 Development Management

4.2.1 Section 13 of the Planning (Scotland) Act 2019 Act (the "2019 Act") amends Section 24 of the 1997 Act regarding the meaning of the statutory Development Plan, such that for the purposes of the 1997 Act, the Development Plan for an area is taken as consisting of the provisions of:

- > The National Planning Framework; and
- > Any LDP.

4.2.2 Therefore, the statutory Development Plan covering the site consists of NPF4 and the Perth and Kinross Council Local Development Plan 2 (PKCLDP2) (adopted in November 2019). PKC LDP2 is currently in the early stages of review with PKCLDP3 targeted for adoption in late 2027.

4.2.3 The Chief Planner's Letter also states with regard to Supplementary Guidance associated with LDPs which were in force before 12<sup>th</sup> February 2023 (the date on which Section 13 of the 2019 Act came into force) that they will continue to be in force and be part of the Development Plan.

4.2.4 PKC Supplementary Guidance (SG) – Renewable & Low Carbon Energy is prepared in draft. No material reference to electricity grid infrastructure is provided in the document. A number of other SGs of relevance include: Forest and Woodland Strategy (2020), Landscape (2020), and Flood Risk and Flood Risk Assessments (2021).

### 4.3 How NPF4 is to be used

4.3.1 Annex A (page 94) of NPF4 explains how it is to be used. It states:

*"The purpose of planning is to manage the development and use of land in the long-term public interest ... Scotland in 2045 will be different. We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places."*

- 4.3.2 Annex A states that NPF4 is required by law to set out the Scottish Ministers' policies and proposals for the development and use of land. It adds:
- "It plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals<sup>7</sup>. NPF4 includes a long-term spatial strategy to 2045."*
- 4.3.3 NPF4 contains a spatial strategy and Scottish Government development management policies to be applied in all consenting decisions, and it identifies national developments which are aligned to the strategic themes of the Government's Infrastructure Investment Plan<sup>8</sup> (IIP).
- 4.3.4 NPF4 therefore, for the first time, introduces centralised development management policies which are to be applied Scotland wide. It also provides guidance to Planning Authorities with regard to the content and preparation of LDPs.
- 4.3.5 Annex A adds that NPF4 is required by law to contribute to six outcomes. These relate to meeting housing needs, health and wellbeing, population of rural areas, addressing equality and discrimination and also, of particular relevance to the Proposed Development, *"meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity"*.

#### 4.4 The National Spatial Strategy – Delivery of Sustainable Places

- 4.4.1 Part 1 of NPF4 sets out the Spatial Strategy for Scotland to 2045 based on six spatial principles which are to influence all plans and decisions. The introductory text to the Spatial Strategy starts by stating (page 3):
- "The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change."*
- 4.4.2 The principles are stated as playing a key role in delivering the United Nation's Sustainable Development Goals and the Scottish Government's National Performance Framework<sup>9</sup>.
- 4.4.3 The Spatial Strategy is aimed at supporting the delivery of:
- > 'Sustainable Places': "where we reduce emissions, restore and better connect biodiversity";
  - > 'Liveable Places': "where we can all live better, healthier lives"; and
  - > 'Productive places': "where we have a greener, fairer and more inclusive wellbeing economy".
- 4.4.4 Page 6 of NPF4 addresses the delivery of sustainable places. Reference is made to the consequences of Scotland's changing climate, and it states, *inter alia*:
- "Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving net zero emissions by 2045, and we must make significant progress towards this by 2030...Scotland's Energy Strategy will set a new agenda for the energy sector in anticipation of continuing innovation and investment."*

<sup>7</sup> The 17 UN Sustainable Development Goals are set out at page 95 of NPF4 and include *inter alia* 'affordable and clean energy' and 'climate action'.

<sup>8</sup> The Scottish Government's five-year Infrastructure Investment Plan (2021-22 to 2025-26) was published in February 2021. It set out a vision for Scotland's future infrastructure in order to support and enable an inclusive net zero emissions economy.

<sup>9</sup> The Scottish Government National Performance Framework sets out 'National Outcomes' and measures progress against a range of economic, social and environmental 'National Indicators'.

- 4.4.5 The new Energy Strategy and Just Transition Plan for Scotland (as referenced in NPF4) was published as a consultative draft on 10<sup>th</sup> January 2023 (see below).
- 4.4.6 The National Spatial Strategy in relation to 'sustainable places' is described (page 7) as follows:
- "Scotland's future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment.*
- Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place.*
- Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation."*
- 4.4.7 Although the Proposed Development is not within the provisions of the National Development (ND) category, it would enable the construction of a National Development.
- 4.4.8 Six NDs support the delivery of sustainable places, one being 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.
- 4.4.9 A summary description of this ND is provided at page 7 of NPF4 as follows:
- "Supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply".*
- 4.4.10 Page 8 of NPF4 sets out 'Cross-cutting Outcome and Policy Links' with regard to reducing greenhouse gas emissions. It states:
- "The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment."*
- 4.4.11 A key point in this statement is that the climate emergency and nature crisis are expressly stated as forming the foundations of the national spatial strategy, recognising that tackling climate change and the nature crisis is an overriding imperative which is key to the outcomes of almost all policies within NPF4.

## 4.5 National Developments

### Overview

- 4.5.1 Page 97 of NPF4 sets out that 18 National Developments have been identified. These are described as:
- "significant developments of national importance that will help to deliver the spatial strategy ... National development status does not grant planning permission for the development and all relevant consents are required".*
- 4.5.2 It adds that:
- "Their designation means that the principle for development does not need to be agreed in later consenting processes, providing more certainty for communities, businesses and investors. ... In addition to the statement of need at Annex B, decision makers for applications for consent for national developments should take into account all relevant policies".*

- 4.5.3 Annex B of NPF4 sets out the various NDs and related Statements of Need. It explains that NDs are significant developments of national importance that will help to deliver the Spatial Strategy. It states (page 99) that:
- "The statements of need set out in this annex are a requirement of the Town and Country Planning (Scotland) Act 1997 and describe the development to be considered as a national development for consent handling purposes".*
- National Development 3 "Strategic Renewable Electricity Generation and Transmission Infrastructure"**
- 4.5.4 Page 103 of NPF4 describes ND3 and it states:
- "This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.*
- A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.*
- The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions."*
- 4.5.5 The location for ND3 is set out as being all of Scotland and in terms of need it is described as:
- "Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas."*
- 4.5.6 The Proposed Development is required to enable the delivery of a national development – the proposed Cambushinnie 400 kV substation, which in turn is required to enable the upgrade of the Beauldy-Denny circuit to 400kV – which will further the delivery of the national Spatial Strategy. The Strategy requires a "large and rapid increase" in electricity generation and the delivery of an enhanced transmission network to enable this, it is recognised (NPF4, page 6) that "we must make significant progress" by 2030.
- 4.5.7 The Proposed Development whilst not national development itself, is essential to enabling the delivery of national development which will make a meaningful contribution to targets within this key timescale and that is a very important consideration.

## 4.6 National Planning Policy

- 4.6.1 Part 2 of NPF4 (page 36) addresses national planning policy by topic, with reference to three themes formulated with the aim of delivering sustainable, liveable and productive places.
- 4.6.2 In terms of planning, development management and the application of the national level policies, NPF4 states:
- "The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy*

*states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".*

4.6.3 In terms of "sustainable places", the relevant policies to the Proposed Development include the following:

- > Policy 1: Tackling the Climate and Nature Crisis;
- > Policy 3: Biodiversity;
- > Policy 4: Natural Places;
- > Policy 5: Soils;
- > Policy 6: Forestry, Woodland and Trees;
- > Policy 7: Historic Assets and Places;
- > Policy 11: Energy; and
- > Policy 22: Flood Risk and Water Management;

4.6.4 These policies are addressed below.

4.6.5 The Chief Planner's Letter of 8<sup>th</sup> February 2023 provides advice in relation to applying NPF4 policy. It states that the application of planning judgement to the circumstances of an individual situation remains essential for all decision making, informed by principles of proportionality and reasonableness. It states:

*"It is important to bear in mind NPF4 must be read and applied as a whole. The intent of each of the 33 policies is set out in NPF4 and can be used to guide decision making. Conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement."*

4.6.6 The Letter adds:

*"It is recognised that it may take some time for planning authorities and stakeholders to get to grips with the NPF4 policies, and in particular the interface with individual LDP policies. As outlined above, in the event of any incompatibility between the provision of NPF and the provision of an LDP, whichever of them is the later in date is to prevail. Provisions that are contradictory or in conflict would be likely to be considered incompatible".*

## 4.7 NPF4 Policy 1: Tackling the Climate and Nature Crisis

### Policy 1 & Principles

4.7.1 The intent of Policy 1 is *"to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis"*.

4.7.2 **Policy 1** directs decision makers that *"when considering all development proposals significant weight will be given to the global climate and nature crises."*

4.7.3 This is a radical departure from the usual approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker. Significant weight should therefore be attributed to the Proposed Development given it would be consistent with the intent of Policy 1 and would make a positive contribution by helping to attain its outcome of net zero.

4.7.4 The Chief Planner's Letter of 8<sup>th</sup> February 2023 refers to Policy 1. It states:

*"This policy prioritises the climate and nature crises in all decisions. It should be applied together with the other policies in NPF4. It will be for the decision maker to determine*



*whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises.”*

4.7.5 This statement from the Chief Planner confirms that the decision maker must apply significant weight to the policy, but ultimately it is for the decision maker to decide if it is for or against the proposal. The Proposed Development’s contribution is positive and therefore, applying significant weight in this case would result in a favourable outcome for the Proposed Development.

4.7.6 The term “Tackling” the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action. Furthermore, NPF4 (page 8) refers to cross cutting outcomes and states with regard to Policy 1 that the policy gives significant weight *“to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions”*.

### **The Application of Policy 1**

4.7.7 Given the nature of the Proposed Development, it would make a valuable contribution in relation to targets in enabling the construction of proposed critical grid infrastructure. It will directly further the policy intent and outcomes of Policy 1 and should be afforded significant positive weight in terms of tackling the climate and nature crises.

4.7.8 A further important point is the need to recognise that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a valuable contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of net zero no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). A core purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

4.7.9 The Reporter’s comments on this particular policy in the Sanquhar II Wind Farm Inquiry Report<sup>10</sup> are informative. At paragraph 2.48 of the Supplementary Report, the Reporter addresses NPF4 Policy 1 and states that:

*“tackling the nature crisis is required to be given significant weight alongside the climate crisis. There is no indication that one strand should be given greater priority over the other. That does not necessarily mean that an individual proposal must be shown to respond to both crises in equal measure, however. The two matters are also inextricably linked, with the nature crisis being, in part, exacerbated by climate change.”*

4.7.10 Furthermore, as explained below with reference to NPF4 Policy 3 (Section 4.9), biodiversity enhancement measures delivering 33%, a net gain greater than 10% in biodiversity units are proposed as part of the Proposed Development.

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

### **Policy 11 & Principles**

4.8.1 For the consideration of energy transmission proposals, Policy 11 ‘Energy’ (page 53) is the lead policy. Policy 11’s intent is set out as:

*“to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low carbon and zero emission technologies including hydrogen and carbon capture utilisation and storage.”*

<sup>10</sup> Sanquhar II Wind Farm, Section 36 Decision dated 31 August 2023, Supplementary Report of Inquiry dated 20 February 2023 (Case Reference WIN-170-2006) and Scottish Ministers’ Decision dated 31 August 2023.

- 4.8.2 Policy Outcomes are identified as: “expansion of renewable, low carbon and zero emission technologies”.
- 4.8.3 Policy 11 is as follows:
- “a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*
- i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;*
  - ii. enabling works, such as grid transmission and distribution infrastructure;*
  - iii. energy storage, such as battery storage and pumped storage hydro;*
  - iv. small scale renewable energy generation technology;*
  - v. solar arrays;*
  - vi. proposals associated with negative emissions technologies and carbon capture; and*
  - vii. proposals including co-location of these technologies.*
- b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.*
- c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.*
- d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.*
- e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:*
- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
  - ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;*
  - iii. public access, including impact on long distance walking and cycling routes and scenic routes;*
  - iv. impacts on aviation and defence interests including seismological recording;*
  - v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
  - vi. impacts on road traffic and on adjacent trunk roads, including during construction;*
  - vii. impacts on historic environment;*
  - viii. effects on hydrology, the water environment and flood risk;*
  - ix. biodiversity including impacts on birds;*
  - x. impacts on trees, woods and forests;*



*xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*

*xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and*

*xiii. cumulative impacts.*

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

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

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

4.8.4 The intent and desired outcome of the policy is expressly clear – the expansion of renewable energy, through encouragement, promotion and facilitation, all of which the Proposed Development will help to deliver.

4.8.5 The wording of Policy 11 Paragraph (a)(ii) makes it clear that the policy supports new and replacement grid transmission and distribution infrastructure. The Proposed Development enables the delivery of such infrastructure by ensuring construction access for a proposed national development. As such Policy 11 is considered to remain the lead policy in regard to the assessment of the proposals against Development Plan policy.

#### **The application of Policy 11**

4.8.6 **Paragraph c) of Policy 11** references socio-economic benefits being maximised, rather than simply being taken into account. However, it is also important to note in regard to community benefit, guidance was issued via the Chief Planners letter of 20th September 2024 which provides clarity on the application of Policy 11(c) and the role of community benefits alongside policy considerations on maximising economic impact. The Chief Planner states explicitly that *“We are, however, clear that these are voluntary agreements that sit independent of our planning and consenting systems, and NPF4 Policy 11 (c) does not alter this”.*

4.8.7 With regard to maximising socio-economic benefits, the Applicant has adopted a ‘Sustainable Procurement Code’ and its related ‘Sustainable Procurement Code – Supplier Guidance’ and these are relevant to take into account. The Sustainable Procurement Code is applied to development projects that the Applicant progresses, and its principal purpose is to ensure that the Applicant’s key values are supported, managed and where possible improved.

4.8.8 The Code sets out various obligations on suppliers and contractors covering climate action and in relation to providing affordable clean energy. The Code also addresses environmental obligations and additionally sets out a clear commitment to “decent work and economic growth” (Page 10). A key objective is to ensure that economic value is shared. Amongst the various specific obligations on the Applicant and suppliers is reference to local supply chains. In that regard, page 10 sets out that:

*“SSE has committed to being a global leader for a just energy transition to net zero, with a guarantee of fair work and commitment to paying fair tax and sharing economic value”.*

4.8.9 Furthermore, within the obligations on suppliers and contractors are provisions that require the formation of “constructive local relationships so that communities have the opportunity to directly benefit from significant capital investments... and to have measures in place to maximise opportunities for local people and businesses close to SSE sites and the wider region”.

- 4.8.10 A further obligation is that suppliers and contractors are expected to *“have in place education and employability programmes which promote the development of employee skills as well as local employment, including graduate programmes and apprenticeships”*.
- 4.8.11 As regards Local Supply Chains *“SSE is committed to ensuring that real economic and social benefits flow to local businesses as a result of its investment in new energy infrastructure. It aims to promote sustainable domestic employment, increased local content and more competitive domestic supply chains. It does this through engagement with its suppliers as well as government regulators and trade unions”*.
- 4.8.12 The related Supplier Guidance document sets out with specific regard to local supply chains that suppliers and contractors are:
- > Required to have measures in place to maximise opportunities for local people, supply chains and economies surrounding SSE sites. There may be a requirement to provide evidence of site-specific plans to SSE;
  - > Encouraged to work closely with SSE to promote and support the development of competitive domestic and local supply chains;
  - > Required to provide details of spend with local suppliers and subcontractors, when requested by SSE (“local” is defined as either, within a 50-mile radius of the site or the Local Authority area, unless otherwise defined);
  - > Required to provide reporting of attributed spend with Small Medium Enterprises (SMEs).
- 4.8.13 Specific reference to both of the Codes and these obligations would be set out in any invitation to tender for construction works for the Proposed Development. Therefore, there is clear evidence that beyond the capital spend for the Proposed Development and the direct, indirect and induced employment and economic benefits that would result, the Applicant has policies and measures in place that seek to maximise the opportunity for socio-economic benefits as a result of the Proposed Development.
- 4.8.14 It should also be noted appointed contractors are required by the Supplier Guidance to inform the Applicant of the supply chain engaged, within Perth and Kinross and indeed further afield.
- 4.8.15 **Paragraph d) of Policy 11** states that development proposals that impact on international and national designations *“will be assessed in relation to Policy 4”*. Policy 4 also deals with impacts in relation to local landscape designations. Therefore, the matter of the impacts of the Proposed Development in relation to such national and local designations is examined further below with specific regard to the provisions of Policy 4.
- 4.8.16 **Paragraph e) of Policy 11** states that project design and mitigation *“will demonstrate how”* impacts are addressed. These are listed in the quotation of the policy above and are addressed in turn below.

#### **Impacts on Communities and Individual Dwellings**

- 4.8.17 There are no predicted significant effects on communities or individual dwellings as a result of the Proposed Development. Noise mitigation measures are proposed for two key properties to ensure their amenity is protected during construction of the Proposed Development. Assessments have shown that the noise levels will remain below day and night time thresholds during construction.

#### **Noise**

- 4.8.18 As regards noise, Chapter 11 of the EA Report provides an assessment of the potential effects of noise and vibration from the construction and operation of the Proposed Development on sensitive receptors. Mitigation measures have been embedded into the Proposed Development, and a Construction Noise Management Plan (CNMP) will be

prepared by the Principal Contractor with recommendations relating to noise and vibration control during the construction phase.

- 4.8.19 In addition to the CNMP, it is recommended that temporary barriers are used when activities are being carried out in close proximity to the Gamekeepers Cottage and Loaning View. The assessment has identified that with the embedded mitigation no significant noise or vibration effects would arise.
- 4.8.20 Compliance with appropriately derived sound level limits could be ensured via an appropriately worded condition. Further consideration of further specific noise mitigation measures is not considered necessary.
- 4.8.21 There is potential for cumulative effects to occur as a result of the Proposed Development and in combination with cumulative developments identified in the surrounding area. Therefore an assessment has been undertaken which concludes that no significant cumulative effects are predicted.

#### **Landscape and Visual Considerations**

- 4.8.22 Before examining the landscape and visual effects of the Proposed Development, Part e(ii) of Policy 11 makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of renewable energy and transmission infrastructure. This is a very different starting point compared to the position in the former Scottish Planning Policy (SPP) and there is a very clear steer that significant effects are to be expected, and where localised and/or subject to appropriate design mitigation, they should generally be acceptable.
- 4.8.23 It is important to note that there is an existing established substation in the area with access track, and the Proposed Development is directly linked to the delivery of the proposed new Cambushinnie 400 kV substation. The design of the haul track has been developed such that its length and impact are minimised as far as practicable whilst sitting logically with existing access tracks and infrastructure, topography, and natural features in the locale.

#### *Overview of Design Approach*

- 4.8.24 The need for the Proposed Development has been clearly established. A series of development considerations were identified and assessed.
- 4.8.25 Landscape and visual considerations have been important in informing the siting and design of the Proposed Development. This process ensures potential adverse effects are designed out as far as possible and mitigation measures are embedded within the scheme design, further reducing potential adverse effects. Key embedded mitigation measures for landscape and visual include:
- > Siting of the Proposed Development within a relatively visually contained locations, where trees, woodland and topography limit the potential for landscape and visual impacts;
  - > Incorporating seeded embankments to aid landscape integration of the linear Proposed Development;
  - > Inclusion of native woodland planting adjacent to the temporary bridge.
  - > Incorporating a section of hedgerow alongside the Proposed Development and along an adjacent field boundary to reflect and reinforce the existing landscape pattern and provide an element of screening from nearby receptors; and
  - > Incorporating specimen tree planting to infill gaps within the tree lined B8033 road corridor.

#### *Landscape Character*

- 4.8.26 The landscape appraisal considers the effects on Landscape Character Type (LCT) 384: Broad Valleys Lowlands – Tayside and concludes that on balance, although locally intensive, change resulting from construction would be focused on a relatively small part of the wider LCT and would be both temporary in nature and of short duration. No significant effects are predicted.
- 4.8.27 During operation, all potential effects would be indirect and related to movement of vehicles along the completed haul track to facilitate construction of the proposed Cambushinnie 400 kV substation. The level and extent of movement would be slightly reduced from that experienced during construction of the haul track. Topography, trees, and woodland would limit the extent of change to a relatively small and contained part of the LCT. On balance, the magnitude of change is assessed as low, temporary and short term, with no significant effects predicted.
- 4.8.28 Post operation following completion of the construction and operation of the haul track areas would be reinstated, the bridge deck would be removed and movement and activity on the haul road would be minimal. Direct change would be from localised loss of vegetation, altered landform and introduction of new structures / features. Indirect change to perceptual change to the LCT would occur over a slightly wider extent, but this would be limited by the undulating topography and surrounding trees / woodland. The haul track would be low-lying and linear; contained within agricultural land and forestry, where the intervening landform will help to limit the impression of change. No significant effects are predicted overall and where effects are identified these are localised.

*Designated Landscapes*

- 4.8.29 The Ochil Hills Local Landscape Area (LAA) and the Braco Garden and Designed Landscape (GDL) is located in close proximity to the study area
- 4.8.30 There are no landscape designations in the Site (within the redline boundary) itself. No impacts are anticipated on the landscape designations identified within or in close proximity of the study area.

*Visual Effects*

- 4.8.31 The appraisal has identified negligible and minor adverse effects on the majority of viewpoints and visual receptors assessed at construction, temporary operation and post operation.
- 4.8.32 Slightly greater change and temporary, short term moderate adverse effects are anticipated for receptors associated within Viewpoint 4: Loaning View and Viewpoint 6: Silverton Farm during construction and temporary operation in both cases. Following completion the level of change is anticipated to reduce to minor adverse effects at post operation and in the longer term.
- 4.8.33 Proposed planting included as part of the Proposed Development would help to reduce local change in the longer term.

*Cumulative Effects*

- 4.8.34 The Study Area already accommodates a considerable scale of electricity infrastructure. The potential cumulative developments list for the location concludes that these are primarily located outside the 1 km Study Area and with very little, or no potential, for intervisibility or contribution to the impression of a cumulative change.

**Public Access**

- 4.8.35 The construction and operation of the Proposed Development is not considered to give rise to significant adverse effects to public access, or use of undesignated paths or tourist traffic routes.

### **Aviation, Defence Interests and Telecommunications**

- 4.8.36 The Proposed Development will not give rise to any negative effects in this regard.

### **Impacts on Road Traffic and Trunk Roads**

- 4.8.37 An assessment of the effects of construction traffic has been undertaken and is reported within Chapter 10 of the EA Report. Prior to mitigation, temporary environmental effects are forecast for severance, fear and intimidation, pedestrian safety, non-motorised user amenity, non-motorised user delay and road vehicle and passenger delay.
- 4.8.38 Mitigation in the form of a CTMP is proposed. It is considered that this can form a condition to any resulting consent and would be subject to approval by the relevant roads authority and other statutory consultees as necessary.
- 4.8.39 Post mitigation residual environmental effects associated with construction traffic are forecast to be direct, temporary (negligible).
- 4.8.40 The cumulative effects are also assessed as Minor and Not Significant prior to mitigation. Post-mitigation residual environmental effects associated with cumulative development construction traffic are forecast to be direct, temporary, negligible.
- 4.8.41 As such no significant road impacts are predicted as a result of the Proposed Development.

### **Historic Environment**

- 4.8.42 An assessment of the potential effects on cultural heritage assets has been undertaken and is reported in Chapter 7 of the EA Report.
- 4.8.43 One asset is recorded as being located within the Site, and it is considered that there is a low potential for further archaeological discoveries. No embedded mitigation is therefore proposed for cultural heritage.
- 4.8.44 The potential for impacts on cultural heritage as a result of the Proposed Development is considered to be low due to previous disturbance during construction.
- 4.8.45 During operation, impacts are expected to be limited to impacts on the setting of heritage assets. A single instance where the Proposed Development had the potential to result in impacts through change to setting, was identified for the scheduled fort on Grinnan Hil to the north of the haul track (SM3088). Views out from, and to, the asset are limited as a result of woodland planting. The prominence of the fort has been further reduced, as a result of the development of Braco village. While the Proposed Development would introduce an embankment and track to the agricultural landscape to the south of the asset, the low lying nature of it would not result in views being severed or blocked, nor would the prominence of the asset, when viewed from the south, or other directions, be altered, as the prominence is largely derived from the woodland that now occupies the hill. The limited alterations to setting are assessed as negligible.
- 4.8.46 Whilst the archaeological potential is considered to be low, there is still potential for previously unrecorded assets to remain within the footprint of the Proposed Development. A phase of archaeological evaluation trenching would be required to fully assess potential. The results of these works would be used to agree the final mitigation which may include, but is not limited to, full archaeological excavation. All works would be agreed with the PKC Archaeologist and approved in a Written Scheme of Investigation (WSI).
- 4.8.47 No cumulative effects on Cultural Heritage are predicted.

### **Hydrology, the Water Environment and Flood Risk**

- 4.8.48 Chapter 9 of the EA Report presents the appraisal of potential effects on hydrology, hydrogeology, geology and soils resulting from the Proposed Development.



- 4.8.49 A Flood Risk Assessment has been undertaken separate to the EA Report and demonstrates flood risk is not increased as a result of the Proposed Development.
- 4.8.50 Protection measures for watercourses, soils and groundwater will be set out in a Construction Environmental Management Plan (CEMP) to be prepared in consultation with the Scottish Environment Protection Agency (SEPA) and approved, subject to an appropriately worded condition prior to commencement of development.
- 4.8.51 The delivery of appropriate commitments thereof, as set out within Chapter 9 can be satisfactorily secured by an appropriately worded condition on any future consent.
- 4.8.52 No significant adverse effects, post-mitigation, are predicted.

### **Biodiversity**

#### *Ecology and Ornithology*

- 4.8.53 Chapters 5 and 6 of the EA Report presents the assessments of the potential effects on ecology and ornithology resulting from the Proposed Development.
- 4.8.54 A number of sensitive ecological receptors are identified but the assessment anticipates that the potential impacts on these from the Proposed Development could be managed through mitigation and compensation. Opportunities for enhancement have also been identified, and these are described further relevant to NPF4 Policy 3 below (Section 4.9).
- 4.8.55 The assessment concludes that significant impacts on the South Tayside Goose Roosts Special Protection Area (SPA) (and Ramsar site. Carsereck and Rhynd Lochs Sites of Special Scientific Interest (SSSI) are unlikely. NatureScot confirmed during consultation. that there would be no adverse effect on site integrity as a result of the Proposed Development – with regard to the qualifying interests of the environmental designations set out above.
- 4.8.56 Four European Designated site are located within 10 km of the Site and one SSSI within 2 km of the Site have been scoped out of the appraisal. However, the River Teith Special Area of Conservation (SAC), Kippenrait Glen SAC, Shelforkie Moss SAC, Upper Strathearn Oakwoods SAC are subject to the Habitats Regulation Assessment (HRA) process. An 'Appropriate Assessment' report will be submitted setting out the potential impacts of the Proposed Development on European sites.
- 4.8.57 All wild birds are protected under the Wildlife and Countryside Act (WCA) 1981, with further protection given to some rarer and vulnerable species, and this is done via schedules including Schedule 1. Therefore, in addition to embedded mitigation measures further specific mitigation measures are proposed in respect of ornithology, which are listed in Section 6.7, Chapter 6 of the EA Report.
- 4.8.58 Mitigation measures will also be detailed in a Breeding Bird Protection Plan (BBPP) which will be prepared and submitted for approval prior to commencement of construction. This can be secured via an appropriately worded condition.
- 4.8.59 A Landscape and Habitat Management Plan (LHMP) will be submitted for approval alongside a Bat Species Protection Plan (SPP) and a Biosecurity Management Plan (BMP).
- 4.8.60 A cumulative assessment has been undertaken, which has concluded that the Proposed Development would not act cumulatively to give rise to significant adverse effects on ecological features, subject to mitigation.

### **Forestry**

- 4.8.61 Chapter 8 of the EA Report addresses the potential impacts on trees resulting from the construction and operation phases of the Proposed Development. This is considered better expressed in terms of arboriculture than effects on forestry due to the nature of woodland on and surrounding the Site. A standalone Arboricultural Impact Assessment (AIA) is presented

in Appendix H of the EA Report, instead of a Forestry Assessment, as no high sensitivity forestry receptors, such as ancient woodland or mature native woodland are present within the Site. As such no significant effects on forestry are predicted.

### **Balancing the Contribution of a Development and Conclusions on Policy 11**

- 4.8.62 Part e) ii) of NPF4 Policy 11 (Energy) makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of energy proposals. This is a very different starting point compared to the position in SPP and there is a very clear steer that significant effects are to be expected, and where localised and/or subject to design mitigation, they should generally be acceptable.
- 4.8.63 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.8.64 The second last paragraph of **Paragraph e) of Policy 11** is expressly clear that in considering any identified impacts of developments, significant weight must be placed on the contribution of the proposal to renewable energy generation targets and greenhouse gas emissions reduction targets.
- 4.8.65 The "contributions" are inextricably related to the direct linkage of the Proposed Development to the delivery of a critical new 400 kV substation at Cambushinnie required as part of the Beaulay to Denny 400 kV upgrade, and policy recognises that any identified impacts must be assessed in the context of these contributions.
- 4.8.66 In terms of contribution to targets, the Proposed Development's contributions have been set out in Chapter 3 above and must be considered relative to the wider contributions of the Cambushinnie 400 kV substation proposal and the connected Beaulay – Denny 400 kV upgrade. The scale of the energy output and emissions savings linked to the associated substation upgrade and other works included is an enabling factor directly related to renewable transmission capacity and security of supply, which are valuable and should be afforded significant weight.

## **4.9 NPF4 Policy 3: Biodiversity**

### **Policy 3 & Principles**

- 4.9.1 **Policy 3** has an intent to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Outcomes of the policy are that biodiversity is enhanced and better connected, including through strengthened nature networks and nature-based solutions.
- 4.9.2 In summary, there are no unacceptable effects arising in relation to biodiversity matters, nor in relation to nature conservation designations which NPF4 Policies 3 and 4 address.
- 4.9.3 **Policy 3** requires developments to wherever feasible, provide nature-based solutions that have been integrated and made best use of, and for significant biodiversity enhancements to be provided.
- 4.9.4 **Paragraph b)** states that:  
*"Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria."*
- 4.9.5 The policy goes on to reference the need for an understanding of the existing characteristics of a site and states that an assessment of potential negative effects should be undertaken



which should be fully mitigated in line with the mitigation hierarchy, prior to identifying enhancements.

- 4.9.6 Paragraph b) iv) of the policy sets out a requirement that *“significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate.”*
- 4.9.7 Paragraph d) adds that *“any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration”*.

#### Current Guidance Position

- 4.9.8 The **letter from the Chief Planner issued on 8 February 2023** refers to the application of Policy 3 where specific supporting guidance / parameters for assessment are not yet available to aid assessments.
- 4.9.9 NPF4 Policy 3 Biodiversity is specifically recognised as one such policy area where final guidance is not yet available. The Chief Planner’s letter states:
- “recognising that currently there is no single accepted methodology for calculating and / or measuring biodiversity ‘enhancement’ – we have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. There will be some proposals which will not give rise for opportunities to contribute to the enhancement of biodiversity, and it will be for the decision maker to take into account the policies in NPF4 as a whole, together with material considerations in each case”*. (underlining added)
- 4.9.10 Therefore, exactly how enhancement is to be measured in the longer-term is to be the subject of further guidance, but a timescale for the production of such guidance is at present unclear.
- 4.9.11 The Scottish Government published ‘**Draft Planning Guidance: Biodiversity**’ in November 2023. Paragraph 1.1 states that it:
- “Sets out the Scottish Minister’s expectations for implementing NPF4 policies which support the cross cutting NPF4 outcome ‘improving biodiversity.’”*
- 4.9.12 The guidance refers to ‘key terms’ and with regard to ‘enhancement’, states at Paragraph 1.10:
- “The terms ‘enhance’ and ‘enhancement’ are widely used in NPF4. In order for biodiversity to be ‘enhanced’ it will need to be demonstrated that it will be in an overall better state than before intervention, and that this will be sustained in the future. Development proposals should clearly set out the type and scale of enhancements they will deliver”*.
- 4.9.13 The guidance addresses development planning and, in terms of development proposals, references ‘core principles.’ At Paragraph 3.1 the guidance states that these principles can be followed when designing developments so that nature and nature recovery are an integral part of any proposal. Section 3.2 of the guidance states:
- “Applying these principles will not only help to secure biodiversity enhancements, they can also help to deliver wider policy objectives including for green and blue infrastructure, open space, nature based solutions, nature networks and 30 x 30. Development proposals which follow these steps are also much more likely to result in more pleasant and enriching places to live, work and spend time.”*
- 4.9.14 The principles set out are as follows:
- > Apply the mitigation hierarchy;

- > Consider biodiversity from the outset;
- > Provide synergies and connectivity for nature;
- > Integrate nature to deliver multiple benefits;
- > Prioritise on-site enhancement before off-site delivery;
- > Take a place-based and inclusive approach;
- > Ensure long term enhancement is secured; and
- > Additionality (ensuring that enhancement delivered is additional to any measures which would have been likely to happen in the absence of the development).

4.9.15 These core principles have been applied, as appropriate with regard to the Proposed Development.

4.9.16 Page 15 of the draft guidance makes specific reference to determining planning applications and, with regard to the policy context, Paragraph 4.1 makes it clear that NPF4 must be read and applied as a whole. Specific reference to NPF4 Policy 3 (Biodiversity) Part 3 b) is made and at Section 4.6 key points in the guidance include the following:

- > It is set out that NPF4 does not specify or require a particular assessment approach or methodology to be used, although the policy makes clear that best practice assessment methods should be utilised; and
- > Assessments can be qualitative or quantitative (for example through use of a metric).

4.9.17 Section 4.12 of the guidance states:

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

4.9.18 Section 4.14 of the guidance states that it will be for the decision maker to determine whether the relevant policy criteria have been met, taking into account the circumstances of the particular proposal. The guidance adds:

*“NPF4 does not specify how much enhancement or ‘net gain’ should be delivered, though biodiversity should clearly be left in a ‘demonstrably better state’ than without intervention. Rather, the selection and design of enhancements will be a matter of judgement based on the circumstances of the individual case, taking into account a range of considerations.”*

4.9.19 The guidance makes reference to the various considerations which are already set out in the NatureScot guidance issued in the Summer of 2023 with regard to NPF4 Policy 3 (as listed above).

4.9.20 The draft guidance also makes reference to off-site delivery of enhancement proposals and states at Paragraph 4.19 that:

*“Where the relevant policy tests cannot be met on site, off-site provision may be considered alongside on site. In these circumstances, off-site delivery should be as close as possible to the development site, with consideration being given firstly to the immediate landscape context and existing ecological value of the site.”*

4.9.21 In early 2024, **NatureScot consulted on ‘a Biodiversity Metric for Scotland’s Planning System’**. The consultation ended on 10 May 2024. The consultation paper outlines work that

NatureScot has been commissioned by the Scottish Government to develop; a biodiversity metric for Scotland's planning system, to support delivery of NPF4 policy 3(b).

4.9.22 This consultation paper does not propose solutions or reach conclusions on specific aspects of the Scottish biodiversity metric to be developed, as these are yet to be fully assessed. While work on developing a Scottish biodiversity metric is ongoing, NatureScot highlight the advice set out in the Scottish Government's draft Planning Guidance on Biodiversity, as referenced above, namely that the absence of a universally adopted Scottish methodology / tool at the present time should not be used to frustrate or delay decision making.

4.9.23 The commission's final outputs will include:

- > a Scottish biodiversity planning metric tool (to be hosted on the NatureScot website), which is based on current understanding of science and evidence, clear and transparent in its workings, accessible and easy to use by relevant professionals with outputs understandable by decision makers, and which informs siting and design of development as well as evidence-based decision making;
- > a user guide supporting the metric (together with any supporting information); and
- > recommendations on any requirements for maintaining and updating the metric and supporting information.

### **The application of Policy 3**

4.9.24 Notwithstanding the lack of policy guidance at the present time, in terms of environmental benefit, there will be a permanent biodiversity enhancement delivered through the Applicant's proposed enhancements to the natural habitat:

4.9.25 The EA Report, Appendix D, Biodiversity Net Gain (BNG) Report sets out that beneficial effects are considered likely as a result of the delivery and implementation of a scheme of biodiversity enhancement.

4.9.26 The baseline area based BNG was calculated at 15.42 Biodiversity Units (BU), while the post development BNG was 20.57 BU, overall. Therefore, the Proposed Development is predicted to achieve a 33 % increase in area-based habitat BUs.

4.9.27 Irreplaceable Habitats are habitats which are technically very difficult or impossible to restore recreate or replace when destroyed. The Proposed Development does not cause a loss or a deterioration of any Irreplaceable Habitats.

4.9.28 Opportunities identified for additional ecological benefits, as a result of habitat creation and enhancement on and off-site include:

- > Tree planting along the B8033 enables enhance connectivity and strengthens the green corridor of the area;
- > Planting with neutral grassland, to provide a broader species mix to that which is currently present, will provide benefit to pollinators; and
- > Woodland planting adjacent to areas of existing woodland, will bolster the existing woodland.

4.9.29 A LHMP is prepared and presented in Appendix C of the EA Report which sets out the implementation and maintenance proposals for delivering biodiversity enhancement.

4.9.30 Given the lack of significant adverse effects predicted, as a result of the Proposed Development, and the scale of the habitat enhancements proposed, the Proposed Development would demonstrably deliver significant positive effects and strengthen nature networks and the connections between them, so they are in a demonstrably better state than without intervention, consistent with the provisions of Policy 3.

- 4.9.31 It is important to keep in mind that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a significant contribution of energy transmission and security within a modern grid network with enhanced capacity, to facilitate the earliest possible decarbonisation of the energy system and the achievement of “net zero” no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). As previously stated a core purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

## 4.10 NPF4 Policy 4: Natural Places

### Policy 4 & Principles

- 4.10.1 The policy has an intent to protect, restore and enhance natural assets making best use of nature-based solutions. Policy outcomes state that natural places are protected and restored, and natural assets are managed in a sustainable way that maintains and grows their essential benefits and services.
- 4.10.2 **Policy 4, Paragraph a)** of the policy states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.
- 4.10.3 **Policy 4 paragraph b)** refers to development proposals which are likely to have a significant effect on a European designated sites and sets out in such circumstances the requirement for appropriate assessment.
- 4.10.4 **Policy 4, Paragraph c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park, or a National Scenic Area (NSA) should be addressed. No national designations would be significantly affected as a result of the Proposed Development.
- 4.10.5 **Policy 4, Paragraph d)** deals with local landscape designations. Policy 4, Paragraph d) is as follows:  
*“Development proposals that affect a site designated as ...a local landscape area in the LDP will only be supported where:*  
  - > i Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*
  - > ii Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance”.*
- 4.10.6 The policy now follows a similar construct to that which deals with national level designations. The first limb of the policy refers to significant effects on the “*integrity*” of the area or “*the qualities for which it has been identified*”.
- 4.10.7 The policy set out in the second limb of NPF4 Policy 4, Paragraph d) provides that development proposals that affect a site designated as a local landscape area will only be supported where any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.
- 4.10.8 **Paragraph e)** addresses the precautionary principle.
- 4.10.9 Paragraph f) sets out that “*development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application*”.

#### The application of Policy 4

- 4.10.10 As explained above in the context of NPF4 Policy 11 (Energy), the EA Report contains an assessment of the effects of the Proposed Development and concludes that the Proposed Development can be well integrated into the context of the surrounding landscape. The Site also has the capacity to accommodate the scale and type of development proposed, without considerably effecting local landscape character and visual amenity. There are no predicted significant effects on Special Landscape Areas (SLAs) or any other national or local designations.
- 4.10.11 Necessary surveys have been undertaken to ensure there would be no adverse effects on species protected by legislation.
- 4.10.12 The Proposed Development, whilst not a national development, would result in benefits of national importance by ensuring the delivery of the proposed Cambushinnie 400 kV substation via enabling construction access, with only very limited and localised impacts, all of which can be appropriately mitigated. The Proposed Development is considered to be in accordance with Policy 4.

### 4.11 NPF4 Policy 5: Soils

#### Policy 5 & Principles

- 4.11.1 The policy intent for Policy 5 is to protect carbon rich soils, restore peatlands and minimise disturbance to soils from development. This is very similar to the policy position that was in the former SPP; however, a key difference, as set out in **paragraph c(ii)**, is that renewable energy proposals are one of the types of development expressly envisaged to be acceptable in principle on peatlands, reflecting the net benefits in carbon emissions reduction and peatland restoration potential which can be gained.
- 4.11.2 **Paragraph a)** states that “*development proposals will only be supported if they are designed and constructed:*
- i. *in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and*
  - ii. *in a manner that protects soil from damage, including from compaction and erosion, and that minimises soil sealing.*”
- 4.11.3 **Paragraph d)** states: “*Where development on peatland, carbon rich soils or a priority peatland habitat is proposed, a detailed site-specific assessment will be required to identify:*
- i. *the baseline depth, habitat condition, quality and stability of carbon rich soils;*
  - ii. *the likely effects of the development on peatland, including on soil disturbance; and*
  - iii. *the likely net effects of the development on climate emissions and loss of carbon.*

*This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A Peat Management Plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.”*

#### The application of Policy 5

- 4.11.4 The EA Report assesses the potential impacts of the Proposed Development on geology, hydrogeology and peat, which concludes that with mitigation no significant residual effects arise.



4.11.5 As explained above with regard to NPF4 Policy 11, the Applicant has proposed an appropriate design, mitigation and restoration approach to protect resources. Peatland effects have been assessed and avoided. The Proposed Development is to enable the construction of 'essential infrastructure' per NPF4 definition of national development and Policy 11; where there is a locational need for the Proposed Development in line with the wider Beauly - Denny 400 kV Upgrade.

4.11.6 The Proposed Development is considered to be in accordance with Policy 5.

## **4.12 NPF4 Policy 6: Forestry, Woodland and Trees**

### **Policy 6 & Principles**

4.12.1 The policy intent is to protect and expand forests, woodland and trees. It states that development proposals that enhance, expand and improve woodland and tree cover will be supported.

4.12.2 Policy 6 Paragraph b) states that *"development proposals will not be supported where they will result in:*

*"i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*

*ii. Adverse impacts on native woodlands, hedgerow and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*

*iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*

*iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry."*

4.12.3 **Policy 6 Paragraph c)** states that:

*"Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered".*

### **The application of Policy 6**

4.12.4 The EA Reports sets out why the Proposed Development does not have impact on forestry. It makes reference to an AIA which addresses the impact on specific trees and clusters of woodland.

4.12.5 The assessment has been undertaken based on a reasonable worst-case scenario where all trees within the footprint of the haul track are removed. The detailed design will further seek to reduce this where possible.

4.12.6 The following is a breakdown of tree loss:

- > Category A - Fourteen individual trees of high quality;
- > Category B - Eight individual trees, part of two tree groups, part of two woodlands of moderate quality;
- > Category C - Six individual trees, part of five groups, three groups and two part woodlands of low quality; and
- > One tree identified as unsuitable for retention for more than ten years (Category U).



- 4.12.7 Twelve individual trees, three groups, one hedgerow and one woodland are subject to Root Protection Area (RPA) incursion to facilitate the Proposed Development.
- 4.12.8 There is likely to be a requirement for crown lifting works in the western canopy of trees T2 and T46 (details included in the AIA) to achieve junction visibility.
- 4.12.9 Prior to the commencement of work, it is recommended that the Site Arboriculturist, Site Manager and PKC Tree officer will undertake a site walkover to identify any further pruning works.
- 4.12.10 Compensatory planning is proposed to offset the loss of canopy cover on the Site. The Proposed Development requires removal of trees and groups rather than entire woodland, but compliance with Section C of Policy 6 may still be met with regard to compensating for canopy cover loss.
- 4.12.11 The total loss of canopy cover across the Site is estimated at 8,186m<sup>2</sup>. The compensation for an equivalent area of canopy loss; a replanting area of 0.82 ha, should be secured. The new planting is recommended to take place in locations adjoining existing woodlands; linking existing green corridors, increasing tree cover within riparian land or targeting areas designated a high priority for new woodland planting.
- 4.12.12 It is considered appropriate that these matters can be addressed by way of a condition to any future planning permission for the Proposed Development.
- 4.12.13 A LHMP (Appendix C of the EA Report) has been prepared to meet tree planting, biodiversity and landscaping objectives.
- 4.12.14 The Proposed Development is therefore considered to be in accordance with Policy 6.

## 4.13 NPF4 Policy 7: Historic Assets and Places

### Policy 7 & Principles

- 4.13.1 The intent of the policy is to protect and enhance the historic environment, assets and places and to enable positive change. Key parts of the policy include the following:
- > **Paragraph c)** states that “development proposals affecting the setting of a Listed building should preserve its character, and its special architectural or historic interest”.
  - > **Paragraph d)** states that “development proposals in or affecting Conservation Areas will only be supported where the character and appearance of the Conservation Area and its setting is preserved or enhanced”.
  - > **Paragraph h)** states that “development proposals affecting Scheduled Monuments will only be supported where:
    - i) direct impact on the Scheduled Monument are avoided;
    - ii) significant adverse impacts on the integrity of the setting of the Scheduled Monument are avoided; or
    - iii) exceptional circumstances have been demonstrated to justify the impact on a Scheduled Monument and its setting and impact on the monument or its setting have been minimised.
  - > **Paragraph I)** states that “development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site or its setting”.
  - > **Paragraph o)** states that “non designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is

*potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impact”.*

#### **The application of Policy 7**

4.13.2 The assessment of effects on cultural heritage assets has determined that no significant adverse effects are predicted and no mitigation is required.

4.13.3 The Proposed Development is considered to accord with the provisions of Policy 7.

#### **4.14 Conclusions on NPF4 Appraisal: Sustainable Place**

4.14.1 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.

4.14.2 A key point within Policy 11 (Energy) is that any identified impacts have to be weighed against a development's specific contribution to meeting targets – which attracts significant positive weight in this case.

4.14.3 Significant weight is also afforded in relation to Policy 1 (Tackling the climate and nature crises). This policy direction fundamentally alters the planning balance compared to the position that was set out in NPF3 and SPP.

4.14.4 The term “tackling” the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action.

4.14.5 The National Spatial Strategy set out in NPF4 is intended to support the delivery of three types of ‘place’ in Scotland: namely, Sustainable, Liveable and Productive places.

4.14.6 Eighteen National Developments are identified to support the strategy, and they are to be a “focus for delivery” (NPF4 page 4). ND 3 (strategic renewable electricity generation and transmission infrastructure) is one of six National Developments which support the delivery of Sustainable Places. The Proposed Development is required to enable the development of national development – in the form of the proposed Cambushinnie 400 kV substation and associated tie-ins and OHL upgrade to 400 kV.

4.14.7 Sustainable Places are primarily concerned with dealing with the climate crisis, and this issue is seen as a fundamental threat to the capacity of the natural environment to provide the services and amenities relied on, including clean air, water and food (NPF4, page 6).

4.14.8 In order to deliver Sustainable Places, NPF4 makes it clear that there must be significant progress in achieving net zero emissions by 2030 in order to hit the overall target of net zero by 2045.

4.14.9 Furthermore, it sets out that meeting the Scottish Government's climate ambition will require a rapid transformation across all sectors of the economy and society ensuring “the right development happens in the right place” (Page 7).

4.14.10 In a development management context, this is to be achieved by the application of NPF4 policies which are to be read as a whole. The policy appraisal contained in this Planning Statement has demonstrated that the Proposed Development would accord with NPF4 when it is read as a whole, and as a consequence, the proposal is considered to be the right one in the right location and one which will contribute to Scotland being a Sustainable Place.

## 5. Appraisal against the Local Development Plan

### 5.1 Introduction

- 5.1.1 The other elements of the statutory Development Plan covering the Site comprises the PKCLDP2 (November 2019).
- 5.1.2 This Chapter does not present a detailed assessment of the Proposed Development as that has been covered in Chapter 4 of this Planning Statement, against the policy provisions of NPF4. As explained earlier, NPF4 is now part of the Development Plan and in the event of any conflict, its provisions prevail as it is the later document.
- 5.1.3 The Proposed Site is located on undesignated land / countryside and directly bounds the southern Braco Settlement boundary. The proposals interacts with the pipeline consultation zone in this located but does not give rise to any negative interaction or effect in that regard.

### 5.2 Relevant LDP Policies

- 5.2.1 The policies of relevance in the PKCLDP2 are summarised below in **Table 5.1** with brief comment added with regard to how the policies relate to the policies of NPF4, where relevant:

**Table 5.1: PKCLDP2 Policy Summaries**

LDP Policy	Policy Summary	Comment re NPF4
Policy 1 Place Making	The policy is split into various parts and part 1A is of some relevance. It states that development must contribute positively to the quality of the surrounding built and natural environment and that all development should be planned and designed with reference to climate change, mitigation and adaptation.  The policy requires design and siting of development to respect character and amenity of place. Other aspects of the policy relate to more conventional built development and would not be relevant.	The provisions of this general policy insofar as relevant are contained within the scope of NPF4 Policy 11 (Energy).  No conflicts or contradictions with NPF4.
Policy 15 Public Access	The policy states that proposals that would have an adverse impact upon the integrity of any core path or right of way will not be permitted. The policy also requires proposals that would affect public access rights, to ensure that such effects are adequately addressed and where necessary, suitable alternative provisions should be made.	NPF4 Policy 11 deals with impacts in relation to public access.  No conflicts or contradictions with NPF4.
Policy 26 Scheduled Monuments & Archaeology	Policy 26A deals with Scheduled Monuments and states that there is a presumption against development which would have an adverse effect on the integrity of a Scheduled Monument and its setting, unless there are exceptional circumstances.	NPF4 Policy 7 (Historic assets and places) deals with impacts in relation to cultural heritage.

LDP Policy	Policy Summary	Comment re NPF4
	Policy 26B deals with Archaeology and states that the Council will seek to protect areas or sites of known archaeological interest and their settings. Where development is proposed in such areas, there will be a strong presumption in favour of preservation in situ.	No conflicts or contradictions with NPF4.
Policy 27 Listed Buildings	Policy 27A deals with listed buildings and states that there is a presumption in favour of retention of listed buildings. It adds that the layout, design, materials, scale and siting and use of any development which will affect a listed building, or its setting should be appropriate to the building's character, appearance and setting.	NPF4 Policy 7 deals with cultural heritage.  No conflicts or contradictions with NPF4.
Policy 29 Gardens & Designed Landscapes	The policy states that the Council will seek to manage change in order to protect and enhance the integrity of those sites that are included on the current Inventory of Gardens and Designed Landscapes.	NPF4 Policy 7 deals with nationally important Gardens and Designed Landscapes.  No conflicts or contradictions with NPF4.
Policy 31 Other Historic Environment Assets	The policy states that there is also a range of non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, historical woodlands and routes, which do not have statutory protection. It states that these resources are, however, an important part of Scotland's heritage and the Council will seek to protect and preserve significant resources as far as possible.	NPF4 Policy 7 deals with impacts in relation to cultural heritage.  No conflicts or contradictions with NPF4.
Policy 33 Renewable & Low Carbon Energy	Policy 33a states that proposals for the utilisation, distribution and development of renewable and low carbon sources of energy will be supported, subject to a number of factors. These include the individual or cumulative effects of a development in relation to: <ul style="list-style-type: none"> <li>&gt; Biodiversity and natural heritage;</li> <li>&gt; Woodland and forestry;</li> <li>&gt; Landscape character, local landscape areas, wild land areas and national scenic areas;</li> <li>&gt; Visual amenity;</li> <li>&gt; The historic environment and cultural heritage;</li> <li>&gt; Hydrology, the water environment and flood risk;</li> <li>&gt; Air quality, including any effects on greenhouse gas emissions and impacts from construction;</li> <li>&gt; Aviation, defence and seismological recording;</li> </ul>	NPF4 Policy 11 deals with Energy developments.  Whilst Policy 33 of the LDP requires the contribution of a development to targets to be taken into account, NPF4 Policy 11 expressly requires significant weight to be given to such a contribution.  As such Policy 33 contradicts Policy 11 and NPF4 take priority.

LDP Policy	Policy Summary	Comment re NPF4
	<ul style="list-style-type: none"> <li>&gt; Telecommunications and broadcasting infrastructure;</li> <li>&gt; Residential amenity of the surrounding area (including noise and shadow flicker); and</li> <li>&gt; Hazardous installations (including pipelines).</li> </ul> <p>The policy also requires consideration of:</p> <ul style="list-style-type: none"> <li>&gt; The contribution of the development towards meeting carbon reduction and renewable energy generation targets;</li> <li>&gt; The net economic impact of a proposal;</li> <li>&gt; The transport implications arising;</li> <li>&gt; Construction and service tracks and borrow pits, including effects on soils such as carbon rich soils, deep peat and priority peatland habitats or prime agricultural land;</li> <li>&gt; The effects on public access;</li> <li>&gt; Decommissioning, including any conditions/bonds considered necessary for site restoration;</li> <li>&gt; Opportunities for energy storage.</li> </ul>	
Policy 38 Environment and Conservation	<p>Policy 38A deals with international nature conservation sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).</p> <p>Policy 38B deals with national designations including National Parks, National Scenic Areas, Sites of Special Scientific Interest and National Nature Reserves. The policy tests in relation to international and national designations in the policy are the same as those as set out in national planning policy, namely NPF4.</p> <p>Policy 38c deals with local designations. It states that development which would affect a local designation will not normally be permitted except where the Council is satisfied that the objectives of designation and the overall integrity of the designated area would not be compromised; or any locally significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits.</p>	<p>NPF4 Policies 3 (Biodiversity) and 4 (Natural places) deal with natural heritage matters.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 39 Landscape	<p>The policy states that development and land use change, including the creation of new hill tracks, should be compatible with the distinctive characteristics and features of Perth and Kinross's landscapes, which requires reference to the Tayside Landscape Character Assessment.</p>	<p>NPF4 Policies 11 and 4 deals with landscape matters.</p> <p>There is a conflict with NPF4 policy provisions.</p>

LDP Policy	Policy Summary	Comment re NPF4
	<p>The policy states that proposals will be supported where they do not conflict with the aim of maintaining and enhancing landscape qualities.</p> <p>Proposals need to demonstrate with reference to an appropriate landscape capacity study that either in the case of individual developments or when cumulatively considered alongside other existing or proposed developments, that they satisfy certain criteria. These include the following:</p> <ul style="list-style-type: none"> <li>&gt; They do not erode local distinctiveness, diversity and quality of Perth and Kinross's landscape character areas, the historic and cultural dimension of the area's landscapes, visual and scenic qualities of the landscape, or the quality of landscape experience.</li> <li>&gt; They safeguard views, viewpoints and landmarks from development that would detract from their visual integrity, identity or scenic quality.</li> <li>&gt; They safeguard the tranquil qualities of the area's landscapes.</li> <li>&gt; They safeguard the relative wildness of the area's landscapes, in particular, wild land areas.</li> <li>&gt; They provide high quality standards and landscape design, including landscape enhancement and mitigation schemes when there is an associated impact on a landscape's qualities.</li> <li>&gt; They incorporate measures for protecting and enhancing the ecological, geological, historic, cultural and visual immunity elements of the landscape; and</li> <li>&gt; They conserve the experience of the night sky in the less developed areas of Perth and Kinross through design solutions with low light impact.</li> </ul> <p>The policy also references local landscape areas (LLAs) and states that development should only be permitted where it will not have a significant adverse impact on their special character or qualities, or where these impacts are clearly outweighed by social and economic benefits that are of local significance to Perth and Kinross.</p>	<p>NPF4 Policy 4 sets out specific policy tests for dealing with impacts in relation to Local Landscape designations and these differ significantly from the provisions within Policy 39.</p> <p>Furthermore, NPF4 Policy 11 contains landscape as one of a number of considerations and it also contains a specific balancing mechanism in relation to consideration of impacts and the contribution of a development to targets.</p> <p>Policy 39 conflicts with NPF4 and as such NPF4 takes priority.</p>
Policy 40 Forestry, Woodland and Trees	The policy sets out that the Council will follow the principles of the Scottish Government policy on control of woodland removal and developers are expected to fully accord with its requirements. It adds that in accordance with that document, there	NPF4 Policy 6 deals with forestry, woodland and trees.



LDP Policy	Policy Summary	Comment re NPF4
	will be a presumption in favour of protecting woodland resources, except where the works proposed involve the temporary removal of tree cover in a plantation, which is associated with clear felling and restocking. It adds that in exceptional cases where the loss of individual trees or woodland cover is unavoidable, the Council will require mitigation measures to be provided.	No conflicts or contradictions with NPF4.
Policy 41 Biodiversity	The policy states that the Council will seek to protect and enhance all wildlife and wildlife habitats, whether formally designated/protected or not, taking into account the ecosystems and natural processes in the area. It adds that proposals that have a detrimental impact on the ability to achieve the guidelines and actions in the Tayside Local Biodiversity Action Plan will not be supported unless clear evidence can be provided that the ecological impacts can be satisfactorily mitigated.	NPF4 Policies 3 and 4 deal with biodiversity.  No conflicts or contradictions with NPF4.
Policy 51 Soils	<p>The policy states that the Council will seek to protect soils from damage, such as erosion or compaction. It adds developments located on areas of good quality agricultural soils will only be supported in certain circumstances. The policy adds that the Council is also committed to ensuring that development avoids disturbance to, and the loss of, carbon rich soils, including peatland, which are of value as carbon stores.</p> <p>The policy also allows for exceptions in relation to development that would disturb carbon rich soils, and in such circumstances, development is to be informed by appropriate peat surveys and management plans and any disturbance or excavation should be minimised. An assessment is also required of likely effects of development on carbon dioxide emissions and suitable mitigation measures are to be identified.</p>	NPF4 Policy 5 deals with soils.  No conflicts or contradictions with NPF4.
Policy 52 New Development and Flooding	The policy states that there is a general presumption against proposals for built development or land raising on a functional flood plain and the policy sets out requirements for developers to address flood risk associated with new development.	NPF4 Policy 22 deals with flood risk and water management.  No conflicts or contradictions with NPF4.
Policy 53 Water, Environment and Drainage	The policy deals with the water environment, foul drainage, surface water drainage and natural watercourses.	NPF4 Policy 22 deals with flood risk and water management.  No conflicts or contradictions with NPF4.

LDP Policy	Policy Summary	Comment re NPF4
Policy 56 Noise Pollution	<p>The policy states that there will be a presumption against the siting of development proposals which will generate high levels of noise in the locality of existing or proposed noise sensitive land uses and similarly, against the locating of noise sensitive uses near to sources of noise generation.</p> <p>The policy adds that a Noise Impact Assessment will be required for proposals where it is anticipated that a noise problem is likely to occur.</p>	<p>NPF4 Policy 11 contains noise as one of a number of considerations.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 60 Transport Standards and Accessibility Requirements	<p>The policy deals with development proposals, in particular those that involve significant travel generation and it sets out requirements in relation to transport standards, including parking and the need, in some cases, for the preparation of a Transport Assessment.</p>	<p>NPF4 Policy 13 deals with sustainable transport.</p> <p>No conflicts or contradictions with NPF4</p>

## 5.3 Supplementary Planning Guidance

- 5.3.1 As noted above, Policy 33 of the LDP considers renewable and low carbon energy development. PKC has draft 'Renewable and Low Carbon Energy Guidance', which is dated 2019. The guidance contains detailed advice on how applicants are to address the criteria of LDP Policy 33 when preparing and submitting planning applications for a range of renewable and low carbon electricity and heat generation technologies. Transmission grid infrastructure is not explicitly provided for within Policy 33 or Supplementary Guidance, but the expansion and reinforcement of the grid arises directly from the deployment of renewable energy to meet net zero.
- 5.3.2 The guidance is a material consideration, does not have statutory status and as noted, it remains in draft form. The guidance also contains a Spatial Framework for wind energy, as required by the previous planning policy, SPP.
- 5.3.3 The guidance is therefore out of date, and is in conflict with the provisions of NPF4. PKC recognises this and states on its website, in relation to 'guidance update NPF4 Policy 11 Energy' that following the adoption of NPF4, as part of the Development Plan, the policy framework for the consideration of development proposals within the Council area has changed. It states:
- "this includes an update of national planning policy in relation to energy – Policy 11 – as well as wider updates across the national planning policy framework. The updated policy includes a significant shift in the support of renewable energy infrastructure to support net zero. The current draft guidance is to be reviewed and updated in 2024-2025 to reflect the updated policy position and to provide further guidance on the types of proposals that are being progressed in the Council area."*
- 5.3.4 The Council has indicated that the draft guidance will be available for consultation in due course, but no date has been set.
- 5.3.5 Consideration of other SG has been taken into account in preparation of assessments and referenced within the EA Report as appropriate. PKC have also produced non-statutory Planning Guidance – Planning & Biodiversity in response to NPF4 Policy 3 and has additionally published Planning for Nature: Development Management and Wildlife Guide which sets out how PKC expect nature to be considered and addressed in planning applications.

## **5.4 Conclusions on the LDP**

- 5.4.1 The environmental and topic considerations as referenced within table 5.1 above within the PKCLDP2 policies are encompassed within the broad remit of NPF4 Policy 11 Part e) which sets the criteria upon which assessments will be made for a variety of topic areas. Similarly, the topic provisions of other LDP policies generally fall within the wide-ranging topic remit of NPF4 Policy 11. Each of the relevant development management considerations have been addressed above (Chapter 4) in the context of NPF4 Policy 11 and other relevant NPF4 policies and are not repeated.
- 5.4.2 It is noted that LDP Policy 39 Landscape conflicts with NPF4 Policy 4 which sets out specific policy tests for dealing with impacts in relation to Local Landscape designations, which differ significantly from the provisions within Policy 39. Furthermore, NPF4 Policy 11 contains landscape as one of a number of considerations and it also contains a specific balancing mechanism in relation to consideration of impacts and the contribution of a development to targets. NPF4 is the more recent Development Plan document and as such NPF4 should prevail.
- 5.4.3 The renewable energy policy provisions of the LDP and the draft Supplementary Guidance are based on those of the former SPP.

## 6. Conclusions

### 6.1 The Climate Crisis & Renewable Energy Policy Framework

- 6.1.1 The nationally important benefits of the Proposed Development in terms of its contribution to delivering the construction of the proposed Cambushinnie 400 kV substation have been set out in the context of the current Climate Emergency. The Proposed Development would, in enabling the development and delivery of the Beaully-Denny 400 kV upgrade critical substation at Cambushinnie, help address the climate crisis and very challenging net zero targets whilst contributing to improving security of energy supply.

### 6.2 The Planning Balance

- 6.2.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.
- 6.2.2 NPF4 provides up to date statements of Scottish Government policy, directly applicable to determination of this planning application. This should be afforded very considerable weight in decision-making.
- 6.2.3 NPF4 is unambiguous with regards to the policy imperative to combat climate change, the crucial role of facilitating further renewable energy production and transmission, as well as the scale and urgency of renewables deployment required. As described in this Planning Statement:
- > The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are “*at the heart of our vision for a future Scotland*” so that “*the decisions we make today will be in the long-term interest of our country*”<sup>11</sup>. The policy position, and the priority afforded to combatting the Climate Emergency, is different to that which was set out in NPF3 and SPP;
  - > NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global Climate Emergency in all decisions. This is a radical departure from the usual approach to policy and weight, which clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and
  - > NPF4 is clear that grid transmission infrastructure plays a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions technologies, including transmission infrastructure. This proposed haul track is critical to the delivery of such infrastructure.
- 6.2.4 This change in policy is also seen in the designation of transmission infrastructure applications as National Developments. National Developments are significant developments of national importance that will help to deliver the spatial strategy, as the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure explains. The proposed Cambushinnie 400 kV substation constitutes a national development in this regard, and is a key element within the Beaully-Denny 400 kV upgrade.
- 6.2.5 The Proposed Development does not give rise to any policy conflicts with the Development Plan. The Proposed Development has been designed with embedded mitigation to ensure a satisfactory relationship between the receiving environment and the protection of residents and communities from undue impact.

<sup>11</sup> NPF4, page 2.

- 6.2.6            The Proposed Development is considered to be in accordance with relevant policies and with the statutory Development Plan when read as a whole. The proposal enables the delivery of essential infrastructure and National Development, in order to contribute to the attainment of net zero, and in doing so addresses both the global climate and nature crises.

# Contact

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