

Kinardochy to Errochy Substation Underground Cable (UGC)- Compound, Junction and Track Works

Planning Statement

March 2026

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1. Introduction and Overview

1.1 Introduction

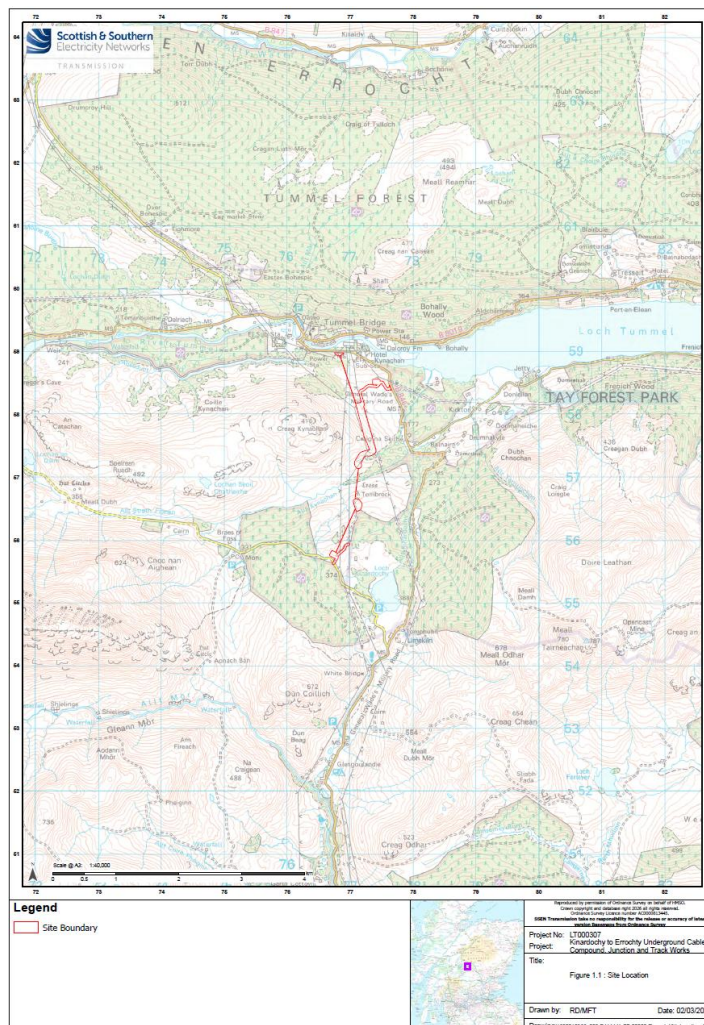
- 1.1.1 Scottish Hydro Electric Transmission plc ('the Applicant'), operating and known as Scottish and Southern Electricity Networks Transmission ('SSEN Transmission'), has submitted a full major planning application, under the Town and Country Planning (Scotland) Act 1997 (as amended), for planning permission to construct approximately 1.7 km of permanent access track, two associated temporary laydown / compound areas, two temporary junction bellmouths, widen two sections of existing access track, approximately 868 m in total, and construct two sections of temporary access track approximately 243 m in total between the existing Errochy substation and the new Kinardochoy substation ('the Proposed Development'). The 'Applicant' and 'SSEN Transmission' are used interchangeably unless the context requires otherwise.
- 1.1.2 The Proposed Development is required to facilitate the installation of a double circuit 132 kilovolt (kV) underground cable (UGC) between the Errochy and Kinardochoy substations, under the wider Beaulay – Denny Second Circuit 400 kV Upgrade Project, which is considered to be a 'National Development' under National Planning Framework (NPF) 4. The UGC itself is considered by the Applicant to benefit from permitted development rights under Class 40 1 (a) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 and is not assessed within the supporting documents or this Planning Statement.
- 1.1.3 The Proposed Development is required 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.
- 1.1.4 SSEN Transmission is proposing to uprate the existing Beaulay-Denny 275 kV circuit to operate at 400 kV to mirror the ratings of the existing 400 kV circuit. This uprating does not require any works to be done to the existing overhead line (OHL) infrastructure, other than new tie-ins into proposed new substations, and alterations to existing substations at Beaulay, Fasnakyle, Fort Augustus, Tummel, Errochy, Kinardochoy and Braco West. Works are required at each of the substations with differing scopes and requirements and therefore consenting types and timescales.
- 1.1.5 The Proposed Development would be largely temporary, however the permanent access track would be operational in perpetuity to support the ongoing operation of the associated UGC. The Proposed Development will be subject to periodic inspections and maintenance.
- 1.1.6 In December 2022, the independent energy regulator for Great Britain, the Office of Gas and Electricity Markets (Ofgem), approved the need for the uprating of the existing Beaulay-Denny 275 kV circuit as part of the ASTI framework. Ofgem's decision approved all of SSEN Transmission's Pathway to 2030 projects, which includes the Errochy to Kinardochoy UGC. It also set out the regulatory framework under which these projects will be taken forward.
- 1.1.7 The Errochy to Kinardochoy UGC, alongside several other major network upgrades planned in the north of Scotland, is therefore part of a UK wide programme of works that are required to meet UK and Scottish Government energy targets. There is a clear expectation from both Governments and Ofgem, that these projects will be delivered by 2030. More specifically, these projects are needed to deliver the 2030 renewable energy targets set out in the British Energy Security Strategy.
- 1.1.8 SSEN Transmission holds a licence under the Electricity Act 1989 ("the "1989 Act") for the transmission of electricity in the north of Scotland and has a statutory duty under section 9 of the 1989 Act to develop and maintain an efficient, co-ordinated, and economical electrical transmission system in its licence area. Where there is a requirement to extend, upgrade or

reinforce its transmission network, SSEN Transmission’s aim is to provide an environmentally aware, technically feasible and economically viable solution which would cause the least disturbance to the environment and to people who use it. This Planning Statement considers the case for approval of the Proposed Development 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 Proposed Development is located approximately 95 m south west of the Errochy Substation at its closest point and 230 m west of the Kinardochoy Substation at its closest point south of Tummel Bridge, Perthshire.
- 1.2.2 The Proposed Development is located in an area with existing above-ground, electrical infrastructure. The existing land use comprises of open moorland used primarily for rough grazing, commercial forestry plantation, native woodland planting and agricultural ground. There are no core paths within the Site Boundary.
- 1.2.3 There are no statutory designations within the Site Boundary.
- 1.2.4 The Site Location is illustrated in Figure 1.1 of the EA and reproduced below at Figure 1.1.

Site Location



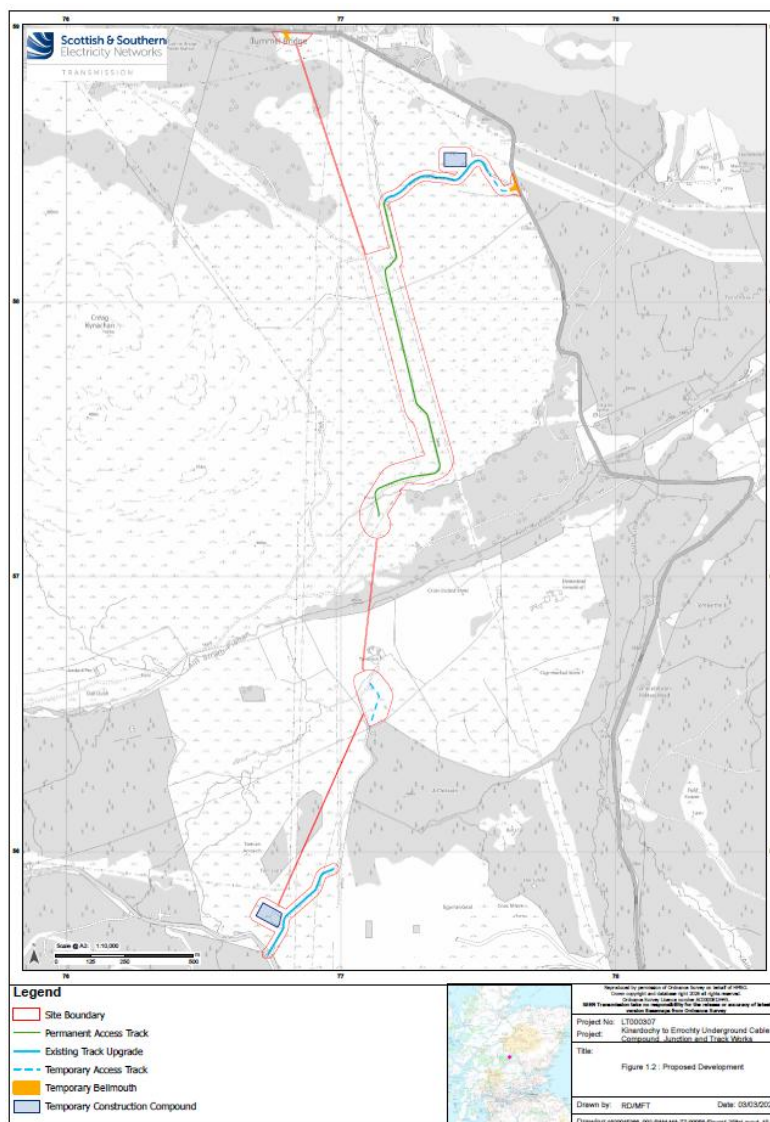
1.3 The Proposed Development

1.3.1

The Proposed Development comprises the following key components which are illustrated on **Figure 1.2 Proposed Development** of the EA and reproduced below at Figure 1.2:

- > 1.7 km of permanent stone access track;
- > 136 m of temporary access track (north);
- > 107 m of temporary access track (south),
- > 462 m of existing track widening (north);
- > 406 m of existing track widening (south); [MS1.1][MS2.1]
- > Two temporary bellmouth junctions off the B846 public road;
- > A temporary laydown / construction compound (north) approximately 80 m x 50 m;
- > A temporary laydown / construction compound (south) approximately 89 m x 54 m, and
- > Reinstatement of temporary elements.

Figure 1.2 Proposed Development



Access

- 1.3.2 Permanent stone access tracks are required to facilitate the installation of the UGC and allow access to UGC joint bays for operation and maintenance purposes.
- 1.3.3 A section of temporary stone access track (north) will be required between the temporary bellmouth leaving the B846 and the northern temporary construction compound to provide construction access.
- 1.3.4 A section of temporary stone access track (south) is required to facilitate the temporary diversion of an existing access to a residential property during construction. All temporary access tracks will be removed on completion of the works and the area reinstated to its previous condition.
- 1.3.5 Two sections of existing track will require temporary upgrades in the form of widening to facilitate the installation of the UGC. Temporary widening to the tracks will be removed on completion of the works and the area reinstated to its previous condition.

Bellmouth Junction

- 1.3.6 Two temporary bellmouth junctions are required to facilitate construction traffic access from the adjacent B846 public road.

Laydown / Construction Compounds

- 1.3.7 Two temporary laydown / construction compounds will be required during construction, located to the north east and south west of the Site. These would provide office and welfare facilities for site staff, parking, laydown areas, and holding and servicing space for construction plant. It is anticipated these compounds would cover an area of approximately 80 m x 50 m and 89 m x 54 m respectively.

Construction

- 1.3.8 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 are subject to approval with Perth and Kinross Council.
- 1.3.9 It is currently anticipated that construction would take approximately 2 years from 2026 to 2028.
- 1.3.10 A Construction Traffic Management Plan (CTMP) would be prepared to manage construction traffic. An Outline CTMP is submitted as part of the application package and would be developed into the CTMP to be prepared by the Principal Contractor, to be secured by condition.

Reinstatement

- 1.3.11 Following commissioning of the Proposed Development all temporary construction areas would be reinstated. Reinstatement would form part of the contract obligations for the Principal Contractor and shall include the removal of all temporary site works.
- 1.3.12 Minor landscaping shall take place as part of the restoration works, in the form of a grass centre strip and reseeded the edges of the permanent track. A Biodiversity Net Gain (BNG) Assessment is being undertaken and will be provided to support the application once complete. The Applicant is committed in all projects to deliver 10% net gain.

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 EA 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 UGC required to connect Errochy and Kinardochoy Substations. The Kinardochoy Substation is considered a National Development (ND) under the provisions of National Planning Framework 4 (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 wider network infrastructure is 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 National Developments as contained in NPF4, and which the Proposed Development will enable, 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 forms part of a package of works to facilitate and enable an overall grid transmission reinforcement which 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. These taken together provide very strong support for onshore wind in principle.
- 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 below. 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 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 COP¹ 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 Report² at page 10 states that it is likely that warming will exceed 1.5°C during the 21st Century and make it harder to limit warming to 2°C. It states (page 12):
- “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)”.*
- 2.2.8 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

- 2.2.9 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.”*
- 2.2.10 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)

COP 29, Baku 2024

- 2.2.11 The 29th UN Climate Conference hosted in Baku, Azerbaijan concluded on November 24 2024. New financial goals agreed at COP 29 aimed at building 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

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

² A Summary of the main 6th Assessment Report.

swift and fair manner as well as triple renewable energy and boost climate resilience. The Climate Change Committee in its summation³ of the conference and finance agreement reached, noted that the new climate finance goal of at least \$300 billion per year from the developed world by 2035 was a compromise outcome, with some developing countries expressing frustration and disappointment. There was recognition of the much greater scale of overall finance needed, marking a shift to formally recognising the wider mobilisation required, which will only be achieved if climate change investment is mainstreamed into wider public and private finance flows.

- 2.2.12 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.

COP 30, Belém 2025

- 2.2.13 COP30 was the 2025 UN Climate Conference, held in Belém, Brazil, from November 10–21, 2025. The conference focused on implementing past agreements and key outcomes included a new "global mutirão" decision for collective action and a call to triple adaptation finance by 2035.
- 2.2.14 Despite support from over 80 countries (including the UK) for a "roadmap" toward phasing out fossil fuels, oil-producing nations voted against this being included from the formal deal and therefore no new "roadmaps" for phasing out fossil fuels were agreed upon. However, Colombia and the Netherlands will co-host the first International Conference on the Just Transition Away from Fossil Fuels in April 2026 in Santa Marta, Colombia. This initiative aims to build on the momentum from COP30 to create a roadmap for phasing out fossil fuels and to move this discussion outside of the formal UN COP negotiations.

UN Emissions Gap Report (2025)

- 2.2.15 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.
- 2.2.16 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions ('NDCs') submitted ahead of COP30 in Brazil as follows (page xii):

"As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive."

- 2.2.17 Section 7 of the Executive Summary sets out that "despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever".

³ Climate Change Committee (2024) COP29: Key outcomes and next steps for the UK Available at: <https://www.theccc.org.uk/publication/cop29-key-outcomes-and-next-steps-for-the-uk/> accessed 17 February 2026.

2.2.18 The report adds: “*accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers.....*”

2.2.19 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy, including wind energy, remains key to combating the climate emergency.

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, 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 Progress⁴

Budget	Carbon budget level	Reduction below 1990 levels	Progress on Budgetary Period
1 st carbon budget (2008 – 2012)	3,018 MtCO ₂ e	26%	-27%
2 nd carbon budget (2013 – 2017)	2,782 MtCO ₂ e	32%	-42%
3 rd carbon budget (2018 – 2022)	2,544 MtCO ₂ e	38% by 2020	-50% ⁵
4 th carbon budget (2023 – 2027)	1,950 MtCO ₂ e	52% by 2025	n/a

⁴ Source: CCC.

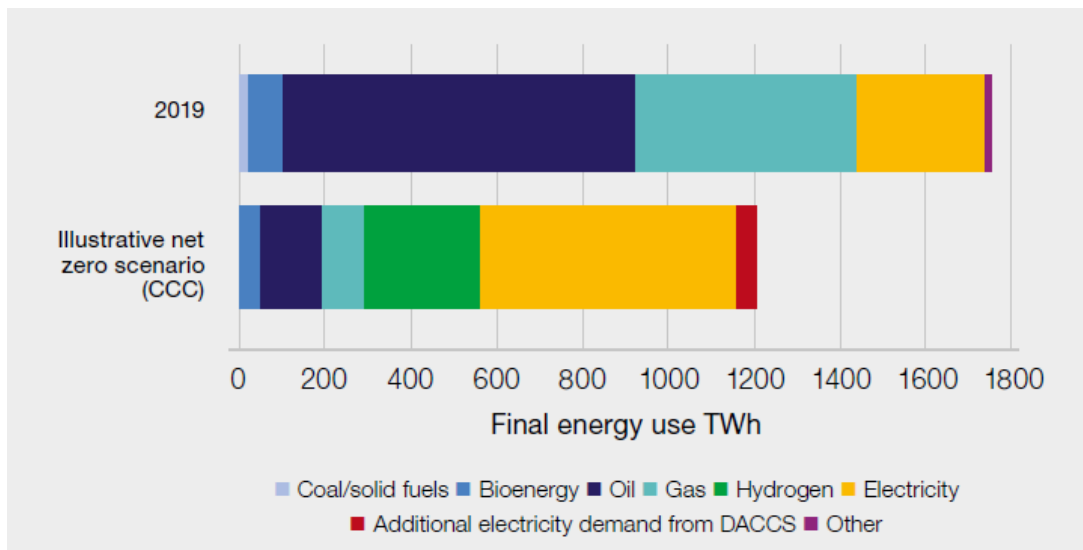
⁵ Confirmed by CCC in ‘Final Statement for the Third Carbon Budget’ May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

5 th carbon budget (2028 – 2032)	1,725 MtCO ₂ e	57% by 2030	n/a
6 th carbon budget (2033 – 2037)	965 MtCO ₂ e	78% by 2035	n/a
7 th carbon budget (2038 – 2042)	535 MtCO ₂ 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 MtCO₂e 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.
- 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 2050⁶



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 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.

⁶ Source: Energy White Paper page 9 (2020). Energy white paper: Powering our net zero future - GOV.UK

Climate Change Committee Report to UK Parliament (June 2025)

- 2.3.18 The CCC published its report 'Progress in reducing emissions – 2025 Report to Parliament'⁷ (the CCC 2025 Report) in June 2025. It highlights that *“greenhouse gas emissions have more than halved since 1990, with the pace of reduction having more than doubled since the introduction of the UK’s Climate Change Act in 2008”* (Page 10).
- 2.3.19 The CCC 2025 Report identifies ten priority actions for the year 2025-2026, one of which is: *“Effectively deliver rapid expansion of the low-carbon electricity system. An effective Allocation Round 7 will be critical to achieving this, given that projects typically take several years to come onstream.”* (Page 19)
- 2.3.20 The CCC 2025 Report highlights that renewable electricity generation expanded more in 2024 than in any of the previous six years, driven by wind and solar. However, the pace still needs to accelerate significantly to meet 2030 goals. This will require a tripling in annual installations of both offshore and onshore wind and a four-fold increase in solar compared to the average rate seen since the start of the decade.
- 2.3.21 Total operational capacity for onshore wind was 16 GW in 2024, and further capacity is currently contracted to bring total capacity to 20 GW by 2027. The report goes on to state in relation to reaching the 27GW 2030 target (UK) for onshore wind, which is the lower end of the Government’s capacity range, *“will require more than 1.8 GW to be added each year on average, the same as the peak seen in 2017. However, only 0.8 GW of onshore wind was installed in 2024. Onshore wind installation rates will need to triple compared to the average pace of deployment since the start of the decade.”*(page 60)
- 2.3.22 In relation to solar, operational capacity has been increasing but deployment will need to accelerate significantly beyond the currently contracted pathway in order to meet the Government’s target range for 2030. The Report notes that currently around 18 GW of solar capacity is installed, with a further 5 GW contracted to bring total capacity to 23 GW in 2027.
- 2.3.23 It states that *“Meeting the lower end of the Government’s capacity range - 45 GW - will require this ambition to be matched with supportive policy developments that enable a considerable increase in roll-out rates, to 4.5 GW installed each year on average. This is over quadruple the amount added over the past three years but is similar to the highest annual installations seen to date, with 4.1 GW installed in 2015.”* (Page 61)
- 2.3.24 In terms of the required emissions savings to achieve the 2030 Nationally Determined Contributions ('NDC') the CCC 2025 Report highlights some risks. One of which include *“delivery risks for planning, grid connections, and successful Contracts for Difference auctions to deliver the rest of the renewables deployment required by 2030 under the Clean Power 2030 Action Plan”*. (page 17)
- 2.3.25 Page 105 the role of low carbon electricity is highlighted further in reducing emissions. In the Committee’s Seventh Carbon Budget advice, 60% of the required emissions reduction is delivered through electrification and low-carbon electricity. The CCC 2025 Report sets out at Box 3.5:
- “Delivering this requires continued growth of renewables deployment over the coming years, to ensure a rapid scale-up in supply of low-carbon electricity.*
- *Renewable generation from wind and solar is well established and is the cheapest form of new electricity generation capacity.*
 - *The UK also benefits from extensive wind resources.*

⁷ CCC (2025) Progress in reducing emissions – 2025 Report to Parliament Available at: <https://www.theccc.org.uk/wp-content/uploads/2025/06/Progress-in-reducing-emissions-2025-report-to-Parliament.pdf>

- *As such, renewables have an essential role to play in achieving Net Zero and meeting the vast majority of demand in the Balanced Pathway. This will require strong and sustained deployment of renewables capacity...*

These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process."

- 2.3.26 In relation to transmission and grid readiness, these are highlighted as critical enablers for renewable deployment and electrification.
- 2.3.27 The CCC 2025 Report notes that transmission network development is progressing, but timely delivery depends on removing barriers in planning; supply chains; and access to grid connections.
- 2.3.28 The CCC 2025 Report repeatedly stresses that electrification of transport, buildings, and industry depends on a rapidly expanding and decarbonised grid. Without faster grid upgrades this will result in renewable projects risk delays, electrification of heat and transport could stall, and the UK may miss its 2030 NDC.

Labour Government & Commitment to Renewables (2024)

- 2.3.29 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.
- 2.3.30 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)

- 2.3.31 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*".
- 2.3.32 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".
- 2.3.33 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*".
- 2.3.34 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 Scotland: Climate Change & Emissions Reductions Legislation

The Climate Change (Scotland) Act 2009 and The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

- 2.4.1 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.
- 2.4.2 When it was enacted, the Climate Change (Scotland) Act 2009 set world-leading greenhouse gas 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 discussed below.
- 2.4.3 Scotland will need significant expansion of renewable generation capacity to achieve these ambitious targets by 2045.

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

- 2.4.4 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.
- 2.4.5 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.
- 2.4.6 The emissions reductions targets set out are significant as the 2009 Act states the Scottish Ministers have a duty to ensure the targets are met. The Scottish Ministers have duties to keep the Scottish Parliament informed about whether the targets are being met and to publish plans for meeting those targets. All Scottish public authorities also have a duty to exercise their functions in a way best calculated to contribute to the delivery of the targets.

Climate Report to Scottish Parliament - Progress in reducing emissions in Scotland (February 2026)

- 2.4.7 The CCC produced a report to the Scottish Parliament entitled ‘Progress in reducing emissions in Scotland’ in February 2026 (‘CCC 2026 Report’). The CCC assessment of the Scottish Government’s progress in reducing emissions found that there are ‘credible plans’ and ‘plans with only some risks’ in place for 91% of the emissions reduction needed to achieve Scotland’s First Carbon Budget (2026 to 2030). Action in several areas has improved in the last two years. Achievements include a rise in the roll-out of electric vehicles and related charging infrastructure, as well as the highest rates of peatland restoration seen to date.
- 2.4.8 The CCC 2026 Report acknowledges the progress made stating that *“the Scottish Government and Scottish Parliament have made rapid progress in legislating the levels of the four carbon budgets, covering the period 2026 to 2045.”* This was secured through the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 (‘2025 Regulations’) which came into force on 10 October 2025.

- 2.4.9 The carbon budgets are set such that the average annual level of emissions will be:
- > 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030), implying a 12% reduction from levels in 2023.
 - > 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035), implying a 36% reduction from levels in 2023.
 - > 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040), implying a 59% reduction from levels in 2023.
 - > 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045), implying an 88% reduction from levels in 2023.
- 2.4.10 The CCC 2026 Report welcomed the publication by the Scottish Government of its draft Climate Change Plan in November 2025 *“setting out – for the first time – policies and plans with quantified emissions reductions attached to policy outcomes across all sectors of the economy and providing an emissions pathway that achieves the carbon budgets.”* (Page 10)
- 2.4.11 However, the CCC highlight that the draft CCP *“does not include deployment pathways for each key indicator. Nor does it include annual sectoral emissions pathways, with only carbon budget averages given...The framework in the final CCP should include indicative annual sectoral emissions and indicator pathways, so that progress can be effectively monitored.”*
- 2.4.12 In relation to Energy supply the CCC 2026 Report states that (page 20):
- “deployment of variable renewable electricity generation is continuing to increase in Scotland, with 1.1 GW of offshore and 1.3 GW of onshore wind capacity deployed in 2024. Remaining emissions in electricity generation come predominantly from the Peterhead gas-fired power station. Reducing emissions further relies on the continued roll-out of wind and solar generation and of network capacity to accommodate it. The draft CCP sets out plans to replace Peterhead with a CCS-enabled gas plant.”*
- 2.4.13 The CCC 2026 Report states that *“Scotland will need to continue its strong progress in rolling out renewable electricity generation and ensure development of electricity networks can keep pace. The Scottish Government should act to accelerate planning and consenting for transmission infrastructure to achieve this.”* (Page 22)
- 2.4.14 This is discussed in further detail at page 77, *“To achieve the Scottish Government’s target of 20 GW of onshore wind by 2030, nearly 10 GW needs to be installed in the next five years, which would be a doubling of capacity. This equates to a rate of deployment approximately two and a half times higher than the average annual deployment in 2023 and 2024.”*
- 2.4.15 The CCC 2026 Report acknowledges the progress in emission reductions relating to energy supply sector noting that *“around two-thirds of the emissions reductions seen since the introduction of the Act in 2009 have been in the energy supply sector. Electricity supply in Scotland is now almost fully decarbonised”.* (Page 58)
- 2.4.16 However it goes on to state that *“further expanding low-carbon generation and supporting transmission network infrastructure in Scotland remains critical to enable decarbonisation of other sectors and to supply low-carbon electricity to the rest of the UK.”*
- 2.4.17 In relation to transmission, it states that transmission network capacity in Scotland needs to rapidly increase to enable wider electrification across the UK. *“There needs to be a rapid build out of the transmission grid and an acceleration in the grid connection process, to support rapid electrification across the UK needed to achieve the UK’s 2030 Nationally Determined Contribution (NDC) and later targets”* (Page 77)
- 2.4.18 The CCC call on the Scottish Government to enable *“rapid expansion of renewable energy and ensure timely planning approval of the transmission infrastructure required to move power from generation sites to where it will be used”.* (Page 108)

- 2.4.19 As part of the priority recommendations the CCC note that “constraints on the transmission network mean that a significant proportion of Scotland’s renewable electricity cannot be exported and is curtailed.” (Page 123)
- 2.4.20 To address this issue the CCC call on the Scottish Government to act to accelerate planning and consenting for electricity transmission infrastructure. The CCC notes that actions to accelerate the approval of transmission network infrastructure could include:
- > “Enhancing planning resources across local authorities and key statutory consultees, such as Transport Scotland and NatureScot.
 - > Developing the National Planning Framework and National Marine Plan to improve clarity, reduce consenting risk and support a coordinated, GB-wide approach to electricity network development.” (Page 123)
- 2.4.21 The CCC 2026 Report identified positive progress in securing emissions reduction but identifies a lot more to do, including continued deployment of renewable energy infrastructure and the acceleration of the transmission infrastructure need to support the route to net zero.

2.5 Scotland: Climate Change & Renewable Energy Policy

- 2.5.1 Sections 2.6-2.11 below address the key Scottish Government climate change and energy policy and related documents, as follows:
- > The Scottish Energy Strategy (2017);
 - > The Draft Energy Strategy and Just Transition Plan (2023);
 - > The Green Industrial Strategy (2024); and
 - > The Draft Climate Change Plan (2025).

2.6 The Scottish Energy Strategy (2017)

- 2.6.1 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.
- 2.6.2 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”.

2.7 The Draft Energy Strategy & Just Transition Plan

- 2.7.1 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 May 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.
- 2.7.2 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.”

- 2.7.3 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.
- 2.7.4 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”.*
- 2.7.5 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”.*
- 2.7.6 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.”*
- 2.7.7 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).
- 2.7.8 The draft Strategy adds that: *“the Scottish Government is working closely with network companies to support timely delivery of this infrastructure”.*

- 2.7.9 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*”.
- 2.7.10 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*”.
- 2.7.11 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*”.
- 2.7.12 It further adds with regard to constraint costs that the Government will continue to work with National Grid ESO, transmission owners and Ofgem “*to explore opportunities to accelerate planned network investment to relieve constraints*”.
- 2.7.13 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.

2.8 The Green Industrial Strategy

- 2.8.1 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".*
- 2.8.2 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.
- 2.8.3 Point 4 of their “onshore wind” approach states “*work with UK Government, Ofgem and the National Energy System Operator 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.*”
- 2.8.4 Availability of grid connections is further referenced as a barrier to tackle to decarbonise industrial processes.
- 2.8.5 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.*”
- 2.8.6 It is clear therefore that to progress the Government's objectives clearly 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.

2.9 Scotland's Climate Change Plan

- 2.9.1 The Scottish Government published ‘Scotland's Climate Change Plan – 2026-2040’ (‘CCP’) on 25 March 2026. The CCP covers the period 2026 to 2040 and aligns with three five-year “carbon budget” periods: 2026-30, 2031-35 and 2036-40. The CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by

the CCC in May 2025, referred to above, and provide a clear pathway towards Scotland achieving net zero by 2045.

- 2.9.2 The CCP confirms that Scotland remains committed to achieving net zero GHG emissions by 2045 at the latest and that as of 2023, Scotland had reduced emissions by 51.3% since 1990 — the largest reduction in the UK.
- 2.9.3 The CCP notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. In 2023, 70% of electricity generated in Scotland was from renewable sources.
- 2.9.4 It acknowledges the opportunity the transition to net zero provides in terms of growing the economy, noting that the net zero transition can support significant economic opportunities for Scotland.
- 2.9.5 The CCP sets out average reductions in GHG emissions (compared to 1990 baseline) for each five-year period:
- > 57% lower than baseline levels for 2026-2030,
 - > 69% lower than baseline levels for 2031-2035,
 - > 80% lower than baseline levels for 2036-2040, and
 - > 94% lower than baseline levels for 2041-2045.
- 2.9.6 These budgets provide a “pathway” toward net zero by 2045, and the Plan is designed to ensure policies are in place to meet them.
- 2.9.7 The CCP sets out sectoral policies relating to a range of sectors, which are prescribed in legislation, including energy supply, agriculture and transport, amongst others. Key policies and actions have been set out for each sector to meet the carbon budgets. The CCP outlines the emissions pathway for each sector covered by the Plan, some of the key actions which will be taken to achieve it and the economic opportunities and benefits this action will support.
- 2.9.8 Annex 2 of the CCP contains the Sectoral Annexes which support the CCP. Energy supply is one of the key areas of focus. At page 84, the document sets out the vision for Scotland stating that:
- “By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and in January 2026, we published the ‘Offshore Wind Policy Statement 2020 update: Scotland’s Offshore Wind Ambition’. This set out an increased offshore wind ambition for Scotland of up to 40GW of new offshore wind capacity by 2040.”*
- 2.9.9 It continues that as we transition to net zero and reduce reliance on fossil fuel generation *“energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply.”* (page 84, Annex 2)
- 2.9.10 One of the actions identified to achieve the vision of emissions reduction for the energy generation sector means *“moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, we must grow our renewables capacity, including from offshore and onshore wind, and solar.”* (Page 89, Annex 2)
- 2.9.11 The publication of the CCP demonstrates the continued commitment and needs case for delivering additional renewable energy capacity. One can take from that that the associated need for reinforced / new transmission infrastructure to achieve net zero is in turn strengthened.

2.10 Conclusions on the Renewable Energy Policy & Legislative Framework

- 2.10.1 The Applicant's position is that the Proposed Development is strongly supported by the renewable energy policy and legislative framework.
- 2.10.2 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. The rate of emission reductions must increase otherwise the legally binding target of Net Zero by 2045 will not be met.
- 2.10.3 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.
- 2.10.4 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. In their most recent Progress Update, the CCC highlight the importance of accelerating transmissions network consenting and upgrades, to ensure the 2030 and beyond targets can be met.
- 2.10.5 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.
- 2.10.6 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.
- 2.10.7 By way of illustration, this was demonstrated recently in the decision by Scottish Ministers on 9 June 2024 to approve the Applicant's Skye Reinforcement Overhead Line Project, in the Highlands, 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".*
- 2.10.8 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 required UGC between two essential substations (Errochty and the new Kinardochoy substation), which forms part of the Beaully-Denny upgrade which will enable 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 NPF4⁸). 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 Scotland and for the wider Great Britain (GB) area by ensuring that the required UGC connection can be constructed which in turn forms a key connection on the Beaully-Denny 400 kV upgrade.

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.

⁸ NPF4 Annex F, page 148.

- > 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...*”
- > The Applicant’s 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.
- > The Applicant is committed to working with the communities in which it operates and supports the Scottish Governments approach to Community Wealth Building (CWB)⁹. It recognises the potential benefits the approach can bring to local communities in Scotland. SSEN Transmission’s Sustainability Strategy¹⁰ commits to sharing benefits with communities and to working with partners to support local projects, supply chains and housing solutions. Further details are available on the Applicant’s website:
<https://www.ssen-transmission.co.uk/about-us/sustainability/sustainability-communities/>

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% net gain.

⁹ Community Wealth Building (CWB) is an approach to economic development that seeks to transform our local and regional economic systems to enable local communities and people to own, have a greater stake in, access and benefit from the wealth our economy generates.
<https://www.gov.scot/policies/cities-regions/community-wealth-building/>

¹⁰ SSEN Transmission (2024) Sustainability Strategy Available at: <https://www.ssen-transmission.co.uk/globalassets/documents/new-sustainability-documents-2024/strategies/ssen-transmission-sustainability-strategy-2024>

4. Appraisal against NPF4

4.1 Introduction

4.1.1 NPF4 was approved by resolution of the Scottish Parliament on 11 January 2023 and was adopted on 13 February 2023.

4.1.2 A Chief Planner's Letter was issued on 8 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 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 Local Development Plan (LDP).

4.2.2 Therefore, the statutory Development Plan covering the site consists of NPF4 and the Perth and Kinross Local Development Plan 2 (PKCLDP2) (adopted in November 2019). PKC LDP2 is currently in the early stages of review with LDP3 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 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) –A number of SGs of relevance include: Forest and Woodland Strategy (2020), Landscape (2020), and Flood Risk and Flood Risk Assessments (2021). PKC produced non statutory Draft Renewable and Low Carbon Energy Guidance in September 2025. These are discussed as necessary in Chapter 5.

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 Goals¹¹. 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 Plan¹² (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 Framework¹³.
- 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."*
- 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 January 2023 (see below).

¹¹ 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'.

¹² 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.

¹³ The Scottish Government National Performance Framework sets out 'National Outcomes' and measures progress against a range of economic, social and environmental 'National Indicators'.

- 4.4.6 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 is a critical connection within a key National Development, that being the Beaulay – Denny 400 kV upgrade.
- 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 connection of two substations as part of the Beauly to Denny 400 kV upgrade – 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 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 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). The 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 Report¹⁴ 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), the Applicant is committed to delivering 10% BNG on all of its projects..

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.”

¹⁴ 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 critical UGC connection for a significant national development and 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 Planner’s letter of 20 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 also 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, that the Applicant has policies and measures in place that seek to maximise the opportunity for socio-economic benefits as a result of the project.

4.8.14 It should also be noted appointed contractors are required 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 The Proposed Development is located within a landscape that is characterised by limited settlement, with minor tracks used for sporting, forestry and some recreation access, as well as new more visible tracks for access to wind farms, pylon construction and forestry. It has a remote and wild character.

4.8.18 There are a series of clusters of residential properties throughout the landscape study area primarily associated with farmsteads. Tummel Bridge is the only village with the potential to be impacted by the Proposed Development and is located approximately 300m, to the north/northwest of the Site boundary in the north. Tummel Bridge is made up of a series of semi-

detached, terraced and detached houses south of the River Tummel and a holiday park to the north.

4.8.19 In addition, solitary farmsteads and dwellings are dispersed throughout the Study Area.

4.8.20 There are no predicted effects on communities or individual dwellings as a result of the Proposed Development.

Noise

4.8.21 As regards noise, given the nature of the application for an access track to facilitate the UGC, no noise emitting equipment is proposed, as such noise has been scoped out of assessment. Any construction noise would be managed via the Construction Environmental Management Plan (CEMP) which could be secured by condition and agreed with PKC in advance of commencement of development.

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 The Proposed Development is located in an area with existing transmission infrastructure i.e. overhead lines, substations and associated tracks and these are a noticeable component of the landscape, passing over the lower ground of the mountains from north to south. The routing and design of the access track has been developed such that its length and impact are minimised and sit logically with existing access tracks and infrastructure, topography, and natural features in the locale.

4.8.24 Some of the infrastructure is also temporary and will be removed on completion of the UGC.

Overview of Design Approach

4.8.25 The need for the Proposed Development has been clearly established. A series of development considerations were identified and assessed.

4.8.26 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.

4.8.27 A number of embedded mitigation/ design measures have been identified during the assessment process. As the mitigation of landscape and visual effects has been undertaken through an iterative process of revised route selection, and design modifications to avoid or minimise effects, all mitigation is embedded within the final design. As such all effects identified are residual effects.

4.8.28 Full reinstatement of grassland and compensatory tree planting (as necessary) would be carried out within the next planting or seeding season following construction works using locally appropriate species, subject to landowner agreement.

4.8.29 The CEMP will outline reinstatement measures to remediate any vegetation clearance or disturbance following the construction phase.

Landscape Character

- 4.8.30 The site is located within Landscape Character Type ('LCT') 375 - Lower Upland Glens with Lochs. The Proposed Development extends into LCT 376 – Summits and Plateau but has limited potential to exert an effect.
- 4.8.31 The effects on the landscape character at Viewpoint 5 within the host LCT (15 m northeast of the Proposed Development) is assessed as Moderate/ Minor adverse with an assessment of Minor adverse or below for the landscape character at the other viewpoints. It is noted that these effects would be temporary and reversible and relate to the construction phase with minimal effects anticipated during operation.

Designated Landscapes

- 4.8.32 There are two National Scenic Areas (NSA) located within the landscape and visual Study Area:
- > Loch Tummel NSA adjoins the B846 to the east of the Proposed Development; and
 - > Loch Rannoch and Glen Lyon NSA is situated 1.5 km east to southeast of the Proposed Development.
- 4.8.33 There is low inter-visibility with landscape designations or classifications within the study area due to intervening undulating landform and vegetation. The influence of the Proposed Development on landscape receptors would be very localised in scale and would be restricted to the Site and areas in proximity with limited potential for direct or indirect effects on the key characteristics of LCTs or the Special Landscape Qualities of the NSAs.
- 4.8.34 The Strath Tay Local Landscape Area (LLA) is situated approximately 3.5-4km to south east of the route of the Proposed Development. The landscape assessment concludes that there is limited potential for an influence to be exerted due to distance (approximately 3.5 km southeast from the closest point of the Site boundary) and shows limited inter-visibility. It was scoped out of detailed assessment.

Visual Effects

- 4.8.35 The visual effects are limited with Viewpoints 2, 3, 9, and 10 experiencing no magnitude of impact and no residual effects in comparison to the baseline. Viewpoints 1, 4, 6, and 7 would either have a barely discernible change or the view composition would be largely unchanged from the visual baseline.
- 4.8.36 Viewpoint 5 and Viewpoint 8 have the most potential to experience a change due to proximity and an open aspect. This would result in a slight magnitude of impact and up to a moderate adverse residual and localised effect. However, these effects would relate to the construction phase only with very limited influence post reinstatement of the landscape.
- 4.8.37 The only residual effects identified during operation relate to moderate/minor adverse and intermittent visual effects at Viewpoint 5 in proximity to the Proposed Development. These effects would be localised.

Summary

- 4.8.38 Overall, the assessment concludes that the Proposed Development would contain features that are not deemed incongruous with other existing features that define the landscape and visual context such as surrounding forestry and farm access tracks. These features are frequently observed in the views of the landscape surrounding the Site. The assessment concludes that the Site and Study Area have the capacity to accommodate the Proposed Development and would not cause unacceptable harm to the surrounding landscape and visual resource.

Public Access

- 4.8.39 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

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

Impacts on Road Traffic and Trunk Roads

- 4.8.41 An assessment of the effects of the Proposed Development on road and traffic has been scoped out of the EA, due to the scale of the project and the timescales of the works.
- 4.8.42 A CTMP will be prepared by the Principal Contractor prior to any works commencing. The CTMP would describe all mitigation and signage measures that are proposed on the public road network. An Outline CTMP has been submitted as part of the planning application and would be developed into the CTMP to be prepared by the Principal Contractor.
- 4.8.43 As such no significant road impacts are predicted as a result of the Proposed Development.

Historic Environment

- 4.8.44 An assessment of the potential effects on cultural heritage assets has been undertaken and is reported in Chapter 8 of the EA.
- 4.8.45 The assessment examined the potential for direct effects, and effects on setting on archaeological features and heritage assets resulting from the construction and operation of the Proposed Development.
- 4.8.46 The Proposed Development has the potential to impact on unknown buried features and heritage assets as a result of construction and operation. A number of known assets have been recorded within the footprint of the Proposed Development.
- 4.8.47 The General Wade Military Road, three tracks and an old kiln have been identified during assessment as assets with potential effects and mitigation measures have been proposed which would offset direct effects through demarcation and preservation by record.
- 4.8.48 Given the proximity of the Proposed Development to other known assets and the potential for unrecorded buried archaeological remains to survive, mitigation measures designed to avoid, minimise or offset impacts (in the form of a Watching Brief) are proposed and can be subject of appropriate worded conditions.
- 4.8.49 Potential operational effects on the settings of designated assets within the 500 m Study Area have concluded that the Proposed Development will have no impact on setting and no further mitigation in that regard is proposed.
- 4.8.50 Following implementation of mitigation no adverse effects are predicted.

Hydrology, the Water Environment and Flood Risk

- 4.8.51 Chapter 6 of the EA presents the appraisal of potential effects on hydrology, hydrogeology, geology and soils resulting from the Proposed Development.
- 4.8.52 The assessment has identified that the proposed routing of the access track and location of the construction compounds and bellmouths would require only one watercourse crossing. In addition, the Proposed Development intersects with one area of potential Ground Water Dependent Terrestrial Ecological (GWDTE) site identified through NVC surveying. The area has been assessed however, and is not considered as being groundwater dependent, based on the topographical and hydrogeological characteristics of the GWDTE area.

- 4.8.53 In relation to flood risk, the siting of the permanent above ground features within the Site would be directed away from areas assessed to be at risk of flooding. The Proposed Development is to be set outside of the area identified by SEPA flood maps to be at a fluvial flood risk. Watercourse crossings would be designed to accommodate the 1 in 200 (0.5 %) annual probability flood event in line with SEPA guidance.
- 4.8.54 Surface water flood risk would be accounted for during detailed drainage design, in consultation with SEPA with Sustainable drainage (SuDS) measures ensuring that runoff rates would not be increased for events up to the 1 in 100 (1%) annual probability storm. For permanent track additional allowance would be provided for climate change.
- 4.8.55 Upon implementation of mitigation as set out within a CEMP and with the employment of best practise during construction no residual effects in relation to hydrology, water environment or flood risk are anticipated.

Biodiversity

- 4.8.56 Chapters 4 and 5 of the EA present the assessments of the potential effects on ecology and ornithology arising from the construction and operation of the Proposed Development.
- 4.8.57 The appraisal of the Proposed Development has identified potential impacts on the River Tay Special Area of Conservation (SAC) and Dalcroy Promontory Site of Special Scientific Interest (SSSI), Ancient Woodland, habitats (particularly blanket bog), upland wet heath and woodlands), Ground Water Dependent Terrestrial Ecosystems (GWTDE) and water vole.
- 4.8.58 Potential impacts on breeding birds are also identified as a potential impact.
- 4.8.59 Proposed mitigation for ecology includes habitat reinstatement, compensatory planting, the presumed avoidance / retention of sensitive habitats and protected species, a CEMP to include measures to protect ecological features and a suitably qualified Ecological Clerk of Works (ECoW) to input into the CEMP to ensure appropriate mitigation measures are in place. A pre- construction protected species survey is also recommended. These measures can all be addressed in suitably worded conditions to any future consent.
- 4.8.60 Proposed mitigation for ornithology includes the inclusion of measure to protect ornithological features within the CEMP, a pre-construction nesting bird check, and habitat reinstatement / landscape planting which could provide alternative habitat to be used by nesting birds.
- 4.8.61 The assessment concludes that following implementation of mitigation, no long-term residual effects are predicted as a result of the Proposed Development.

Forestry

- 4.8.62 Chapter 9 of the EA Report addresses the likely impacts of the Proposed Development on forestry receptors associated with construction and operation and provides details of control measures where appropriate.
- 4.8.63 Embedded mitigation through design has sought to avoid most woodland and avoids all ancient woodland. However, there is a possibility that up to 0.13 ha assumed woodland may require felling for the proposed bellmouths, as a worst case scenario. The extent of actual removal will be minimised insofar as possible through micrositing. Compensatory planting is accepted to mitigate any proposed permanent woodland loss and will be provided should any tree felling be required to enable construction.

Balancing the Contribution of a Development and Conclusions on Policy 11

- 4.8.64 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.

- 4.8.65 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.8.66 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.
- 4.8.67 The "contributions" are inextricably related to the direct linkage of the Proposed Development to the delivery of a critical UGV between Errochty and Kinardochoy substations, which is required as part of the Beauty to Denny 400 kV upgrade, and policy recognises that any identified impacts must be assessed in the context of these contributions.
- 4.8.68 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 Beauty – 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 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.
- 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 ‘**Planning Guidance: Biodiversity**’ (‘Biodiversity Guidance’) in December 2025. 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 Biodiversity 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 Biodiversity 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 17 of the Biodiversity 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 Biodiversity 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 Biodiversity 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 Biodiversity 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 Biodiversity 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 An important point is that the Biodiversity Guidance is proposed as a “living document”. Paragraph 5.1 states that it is the Government’s intention that it will be updated as practice “beds in across planning authorities”.

4.9.22 In early 2024 **NatureScot consulted on ‘a Biodiversity Metric for Scotland’s Planning System’** to support delivery of NPF4 policy 3(b). The Biodiversity Guidance notes that NatureScot has now commenced work to develop an adapted biodiversity metric suitable for use in supporting delivery of NPF4 policy 3b. Further information is available on the NatureScot webpages. This includes guidance on the use of existing biodiversity metrics in the Scottish Planning system.

- 4.9.23 The consultation paper did 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 highlighted the advice set out in the Scottish Government's draft Planning Guidance on Biodiversity, (non finalised) 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.
- 4.9.24 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.
- 4.9.25 NatureScot have also published a Research Report¹⁵ in early 2026, which was a review of habitat classifications for their potential use in a Scottish planning biodiversity metric. This report reviews and makes recommendations for systems of vegetation classification to be used to provide data for a Scottish planning biodiversity metric ("the Scottish metric").
- The application of Policy 3**
- 4.9.26 Notwithstanding the lack of policy guidance at the present time, in terms of environmental benefit, SSEN Transmission is committed to protecting and enhancing the environment by minimising the potential impacts from their construction and operational activities. As part of this approach, SSEN Transmission has made commitments within its Sustainability Strategy to deliver 10% biodiversity net gain and leave a positive legacy for nature on all projects gaining consent.
- 4.9.27 While not a requirement under NPF4, the Applicant is preparing a Biodiversity Net Gain Report which sets out the proposed approach to ensuring the Applicant's commitment to securing biodiversity net gain on all its projects is delivered. This will be submitted to the Planning Authority on completion.
- 4.9.28 The Proposed Development may impact blanket bog/peatland. The Applicant is committed to ensuring that a greater extent of blanket bog is restored than the extent of good or moderate condition blanket bog lost. The Applicant intends to enhance retained moderate blanket bog habitats on-site subject to agreement with the relevant landowners.
- 4.9.29 Given the limited adverse effects predicted to result from the Proposed Development, and the biodiversity enhancements committed to by the Applicant, the Proposed Development is capable of delivering significant positive effects for biodiversity so they are in a demonstrably better state than without intervention, consistent with the provisions of Policy 3.
- 4.9.30 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 its contribution towards facilitating essential upgrades to the transmission system and delivering security of supply as part of a modern grid network with enhanced capacity. This will assist in facilitating 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

¹⁵ NatureScot (2026) NatureScot Research Report 1391 - A review of habitat classifications for their potential use in a Scottish planning biodiversity metric Available at:
<https://www.nature.scot/doc/naturescot-research-report-1391-review-habitat-classifications-their-potential-use-scottish-planning#summary>

(as amended). The 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 are stated as being 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 **Paragraph b)** refers to development proposals which are likely to have a significant effect on a European designated site and sets out in such circumstances the requirement for appropriate assessment.
- 4.10.4 **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 **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 The EA has considered the effects on European sites designated for nature conservation and no residual effects are predicted. The Proposed Development has potential connectivity with the River Tay SAC. As a result, a Habitats Regulations Appraisal (HRA) has been undertaken This is provided in **Technical Appendix 4.2: HRA and AA** and considers the potential impacts in further detail, with regards to the conservation objectives, supporting habitats, site

integrity and any likely significant effects on the SAC. It is concluded that the Proposed Development would not adversely affect the integrity of the River Tay SAC, in view of the site conservations objectives, subject to the mitigation measures outlined.

- 4.10.11 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 and that the Site has the capacity to accommodate the scale and type of development proposed, without considerably effecting local landscape character and the landscape designations within proximity to the Site i.e. the Loch Tummel NSA and Loch Rannoch and Glen Lyon NSA.
- 4.10.12 There is low inter-visibility with landscape designations or classifications within the study area due to intervening undulating landform and vegetation. The influence of the Proposed Development on landscape receptors would be very localised in scale and would be restricted to the Site and areas in proximity with limited potential for direct or indirect effects on the key characteristics of LCTs or the Special Landscape Qualities of the NSAs. The Proposed Development is not predicted to influence the Strath Tay LLA given the nature and distance from the designation.
- 4.10.13 Necessary surveys have been undertaken to ensure there would be no adverse effects on species protected by legislation.
- 4.10.14 The Proposed Development, whilst not a national development, would however result in benefits of national importance by facilitating the delivery of the Beauly – Denny Second Circuit 400 kV Upgrade Project, 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 and concludes that with mitigation no significant residual effects would 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 where possible. The majority of the Site is overlain by non-peat soils.
- 4.11.6 A small area of Class 3 peat is crossed by the proposed permanent access track route over a length of approximately 320 m. A small area of Class 1 peat is mapped by NatureScot running adjacent to the proposed access track to be upgraded (south). While this area is in connection with a wider area of blanket bog (underlain by peat) which is offsite to the east, habitats mapped onsite are consistent with non-peatland areas that underlie the majority of the land to the west.
- 4.11.7 Mitigation proposes that excavations on the small area of Class 3 peat will be minimised, and it is anticipated that any site-won peat resulting from the construction of the track will be reinstated within the Site area. Potential impacts on the underlying geology would be managed through the implementation of a CEMP. As such no residual impact is predicted.
- 4.11.8 The Proposed Development is to enable the construction of ‘essential infrastructure’ directly linked to National Development, per NPF4 definition of national development and Policy 11, and there is a locational need for the development as proposed in line with the wider Beauly - Denny 400 kV project.
- 4.11.9 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 impact on forestry. Embedded mitigation through design has sought to avoid most woodland and avoids all ancient woodland.
- 4.12.5 To construct the proposed bellmouth for the Proposed Development there is a potential need for a felling area of up to 0.13 ha within an area of assumed woodland or young trees as shown on the National Forestry Inventory (NFI). The extent of actual removal will be minimised insofar as possible through micrositing. Figure 9.2 Forestry Felling of the EA identifies the location where some minor felling may be required.
- 4.12.6 Should this felling be required compensatory planning would be provided of an equivalent woodland area.
- 4.12.7 The temporary access track to the temporary compound follows an existing track and avoids the stand of trees, classed as native pinewood in Native Woodland Survey of Scotland (NWSS), immediately to the south.
- 4.12.8 The permanent access track on the western edge of this stand of trees follows an existing 4x4 track and with detailed design no felling would be required for this upgrade.
- 4.12.9 In a Scotland-wide context, it is determined therefore that there would be no loss of woodland and no residual effect. 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 post-mitigation. The proposed mitigation is clearly set out in Chapter 8 of the EA Report and centres upon protection of known assets, and a watching brief to record hitherto unknown assets.
- 4.13.3 The Proposed Development is considered to accord with the provisions of Policy 7.

4.14 NPF4 Policy 22: Flood Risk and Water Management

- 4.14.1 The intent of Policy 22 is to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding. Paragraph c) is the most relevant part of the policy which states that development proposals should not increase the risk of surface water flooding to others, or itself be at risk. In addition, all rain and surface water should be managed through Sustainable Urban Drainage Systems ('SUDs').

Application of Policy 22

- 4.14.2 In relation to flood risk, the siting of the permanent above ground features within the Site would be directed away from areas assessed to be at risk of flooding. The Proposed Development is to be set outside of the area identified by SEPA flood maps to be at a fluvial flood risk. Watercourse crossings would be designed to accommodate the 1 in 200 (0.5 %) annual probability flood event in line with SEPA guidance.
- 4.14.3 Surface water flood risk would be accounted for during detailed drainage design, in consultation with SEPA with Sustainable drainage (SuDS) measures ensuring that runoff rates would not be increased for events up to the 1 in 100 (1%) annual probability storm. For permanent track additional allowance would be provided for climate change.
- 4.14.4 The Proposed Development is therefore considered to be in accordance with NPF4 Policy 22.

4.15 Conclusions on NPF4 Appraisal: Sustainable Place

- 4.15.1 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.15.2 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.
- 4.15.3 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 in NPF3 and SPP.
- 4.15.4 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.
- 4.15.5 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.

- 4.15.6 Eighteen National Developments are identified to support the strategy, and they are to be a “focus for delivery” (NPF4 page 4). National Development 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 connection of these key substation within the wider nationally important transmission grid network.
- 4.15.7 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).
- 4.15.8 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.
- 4.15.9 Furthermore, it sets out that meeting the Government's climate ambition will require a rapid transformation across all sectors of the economy and society and that this means ensuring “the right development happens in the right place” (Page 7).
- 4.15.10 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 Relevant, statutory Supplementary Guidance (SG) to support the PKCLDP includes:

- > SG 'Landscape', Adopted 2020;
- > SG 'Forest and Woodland Strategy' (2020); and
- > SG 'Flood Risk and Food Risk Assessments'.

5.1.3 This Chapter does not present a detailed assessment of the Proposed Development as that has been covered in Chapter 4 of this 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.

5.1.4 The Proposed Site is located on undesignated land / countryside.

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 regarding 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	Policy 26A deals with Scheduled Monuments and states that there is a presumption against	NPF4 Policy 7 (Historic assets and places) deals

LDP Policy	Policy Summary	Comment regarding NPF4
Scheduled Monuments & Archaeology	<p>development which would have an adverse effect on the integrity of a Scheduled Monument and its setting, unless there are exceptional circumstances.</p> <p>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.</p>	<p>with impacts in relation to cultural heritage.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 27 Listed Buildings	<p>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.</p>	<p>NPF4 Policy 7 deals with cultural heritage.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 29 Gardens & Designed Landscapes	<p>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.</p>	<p>NPF4 Policy 7 deals with nationally important Gardens and Designed Landscapes.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 31 Other Historic Environment Assets	<p>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.</p>	<p>NPF4 Policy 7 deals with impacts in relation to cultural heritage.</p> <p>No conflicts or contradictions with NPF4.</p>
Policy 33 Renewable & Low Carbon Energy	<p>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:</p> <ul style="list-style-type: none"> > Biodiversity and natural heritage; > Woodland and forestry; > Landscape character, local landscape areas, wild land areas and national scenic areas; > Visual amenity; > The historic environment and cultural heritage; 	<p>NPF4 Policy 11 deals with Energy developments.</p> <p>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.</p>

LDP Policy	Policy Summary	Comment regarding NPF4
	<ul style="list-style-type: none"> > Hydrology, the water environment and flood risk; > Air quality, including any effects on greenhouse gas emissions and impacts from construction; > Aviation, defence and seismological recording; > Telecommunications and broadcasting infrastructure; > Residential amenity of the surrounding area (including noise and shadow flicker); and > Hazardous installations (including pipelines). <p>The policy also requires consideration of:</p> <ul style="list-style-type: none"> > The contribution of the development towards meeting carbon reduction and renewable energy generation targets; > The net economic impact of a proposal; > The transport implications arising; > 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; > The effects on public access; > Decommissioning, including any conditions/bonds considered necessary for site restoration; > Opportunities for energy storage. 	
<p>Policy 38 Environment and Conservation</p>	<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>

LDP Policy	Policy Summary	Comment regarding NPF4
<p>Policy 39 Landscape</p>	<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>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"> > 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. > They safeguard views, viewpoints and landmarks from development that would detract from their visual integrity, identity or scenic quality. > They safeguard the tranquil qualities of the area's landscapes. > They safeguard the relative wildness of the area's landscapes, in particular, wild land areas. > 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. > They incorporate measures for protecting and enhancing the ecological, geological, historic, cultural and visual immunity elements of the landscape; and > They conserve the experience of the night sky in the less developed areas of Perth and Kinross through design solutions with low light impact. <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</p>	<p>NPF4 Policies 11 and 4 deals with landscape matters.</p> <p>There is a conflict with NPF4 policy provisions.</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>

LDP Policy	Policy Summary	Comment regarding NPF4
	<p>outweighed by social and economic benefits that are of local significance to Perth and Kinross.</p>	
<p>Policy 40 Forestry, Woodland and Trees</p>	<p>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 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.</p>	<p>NPF4 Policy 6 deals with forestry, woodland and trees.</p> <p>No conflicts or contradictions with NPF4.</p>
<p>Policy 41 Biodiversity</p>	<p>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.</p>	<p>NPF4 Policies 3 and 4 deal with biodiversity.</p> <p>No conflicts or contradictions with NPF4.</p>
<p>Policy 51 Soils</p>	<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>	<p>NPF4 Policy 5 deals with soils.</p> <p>No conflicts or contradictions with NPF4.</p>
<p>Policy 52 New Development and Flooding</p>	<p>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.</p>	<p>NPF4 Policy 22 deals with flood risk and water management.</p>

LDP Policy	Policy Summary	Comment regarding NPF4
		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.
Policy 56 Noise Pollution	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. 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.	NPF4 Policy 11 contains noise as one of a number of considerations. No conflicts or contradictions with NPF4.
Policy 60 Transport Standards and Accessibility Requirements	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.	NPF4 Policy 13 deals with sustainable transport. No conflicts or contradictions with NPF4

5.3 Supplementary Guidance

5.3.1 The following SGs have been considered appropriately within technical assessments and reported accordingly within the supporting information insofar as they are relevant to the Proposed Development:

- > SG 'Landscape', (2020): the SG was produced to include the review and update of Local Landscape Designations in PKC into the Council's planning policy framework. It also provides further advice on the implementation of Local Development Plan Policy 39: Landscape within the 11 Special Landscape Areas, and will help to bring forward land management initiatives to protect and enhance these areas.
- > SG 'Forest and Woodland Strategy' (2020): the SG provides guidance relating to Policy 40: Forestry, Woodland and Trees of the LDP, and will be used in the assessment of planning applications.
- > SG 'Flood Risk and Food Risk Assessments' (2021): the SG supports the delivery of Policy 53: Water Environment and Drainage.

5.4 Draft Renewable and Low Carbon Energy Planning Guidance

5.4.1 The draft Renewable and Low Carbon Energy planning guidance was published in September 2025 and contains detailed advice on how applicants should address a range of policy criteria. The draft guidance covers a range of renewable and low carbon electricity generation technologies and sets out a consistent approach to be applied across Perth and

Kinross. It has limited relevance to the Proposed Development, however paragraph 2.3 does refer to 'Enabling works including grid infrastructure'.

5.4.2 It states that to facilitate new or extended generation capacity enabling works may also be required and includes grid infrastructure such as transmission and/or distribution network upgrades. The Proposed Development would facilitate these necessary transmission grid infrastructure upgrades.

5.4.3 The EA provides a full assessment of the environmental impact of the works associated with delivering the Proposed Development, as required by the draft guidance in so far as it is relevant, and finds no unacceptable effects as a result of the Proposed Development.

5.5 Emerging Perth and Kinross Local Development Plan 3

5.5.1 The Council are in the process of preparing the next LDP on a timetable that will see its adoption between October – December 2027. PKC submitted the LDP3 Evidence Report to the DPEA on 27 March 2025. In July 2025, the reporter appointed to examine the LDP3 concluded that the evidence report contained insufficient information to enable the planning authority to prepare its local development plan and was therefore returned to PKC.

5.5.2 PKC has prepared the revised LDP3 Evidence Report Resubmission, which was approved at a meeting of Full Council on 10 December 2025. The updated Evidence Report was submitted to the DPEA on 6 February 2026 and a Reporter has been assigned to undertake the Gate Check assessment.

5.5.3 No weight is therefore afforded to the emerging LDP3 at this time.

5.6 Conclusions on the LDP

5.6.1 The environmental and topic considerations 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.

5.6.2 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 and these 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.

5.6.3 The renewable energy policy provisions of the LDP are based on those of the former SPP and therefore have limited weight.

5.6.4 Overall, the Proposed Development has been designed with embedded mitigation to ensure a satisfactory relationship with the receiving environment and to protect residents and communities from undue impact, and is considered to accord with those policies of the LDP which are compatible with NPF4.

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 upgrade to the existing Beauly to Denny 275 kV circuit to operate at 400 kV, a key transmission project which have been set out in the context of the current Climate Emergency. The Proposed Development is required to enable access to facilitate the installation of a double circuit 132 kV UGC between Errochy and Kinardochoy substations – key elements of the Beauly to Denny upgrade project. The UGC itself is considered to be permitted development under Class 40 1(a) of the GPDO 1992.

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 as regards the policy imperative to combat climate change, the crucial role of facilitating further renewable energy production and transmission and 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*”¹⁶. 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 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; 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 access track and associated works 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 UGC and associated substations form key elements within the Beauly-Denny 400 kV upgrade which is a strategic infrastructure project and forms national development. The Proposed Development in and of itself would not constitute National Development, but will enable the delivery of a National development.

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

¹⁶ NPF4, page 2.

satisfactory relationship with the receiving environment and to protect residents and communities from undue impact.

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.

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