

Our Ref: ENQ/2024/1176

Ask for: Stephanie McMillan
Tel: 01467 468676
Email: stephanie.mcmillan@aberdeenshire.gov.uk

Scottish Hydro Electric Transmission Plc
200 Dunkeld Road
Perth
PH1 3AQ

11 September 2024

Dear Sir/Madam

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 EIA Scoping Opinion for Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land at Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX Grid Reference: 378395.786891

I refer to your request for a scoping opinion for the above proposal received on 8 August 2024. I am now in receipt of all the necessary consultation responses and can offer a scoping opinion under Regulation 17 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations).

Schedule 4 of the Regulations states the information which should be included in an Environmental Impact Assessment Report (EIA Report). These guidelines offer the backbone to the structure of an EIA Report and should be used as the basis for your submission.

In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular these include characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen. Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected. Detailed survey work would be required to inform the EIA Report. Following analysis of the aspects of the environment which would be likely to be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed.

Examples of the types of issues that should be addressed include:

- Climate change

- Local Economic Effect
- Landscape Resource
- Soils and geology
- Visual Amenity
- Ornithology
- Visual Amenity
- Ecology
- Nature Conservation
- European Protected Species
- Hydrology and Water Supplies
- Forestry and Tree Felling
- Transport and Traffic including road safety issues and impact on local road network during and after construction work
- Noise
- Cultural Heritage and archaeology
- Land Use
- Land Ownership
- Tourism and Recreation, including footpaths
- Proposed mitigation measures

Please note that the above list is by no means exhaustive and that other issues might become obvious following public consultations and consultations with statutory consultees.

Comments on specific chapters, including those made from internal and external consultees are provided below, along with appendices of the full consultee responses.

In addition to the comments below, the Planning Service has the following comments to make:

Private Water Supplies

The Planning Service has received feedback from residents in the area that whilst certain properties have been shown as having a PWS, the location of the source has been omitted from the map despite the information being provided. It is imperative that accurate information is considered within the EIA Report.

Cumulative impact

In terms of cumulative impact as assessed in 'Table 13.2 Developments Foreseeable to the Applicant', it should also include Quithel Battery Energy Storage System located to the south west of the site. Further details can be found on the ECU Website under reference no. ECU00005005.

Internal consultations

Environment and Infrastructure Services – Archaeology has highlighted that the Cultural Heritage Assessment for potential historic environment impact should include an assessment of the transportation route to site (as specified in response to application ENQ/2024/0148) and for any identified compensatory planting zones. Clarification on the date in paragraph 7.3.2 is sought and whether it should read September 2023. In terms of the desk based assessment in paragraph 7.8.1 there have been updates to the Aberdeenshire HER data for the primary development area. There are also further sites recorded throughout Fetteresso Forest which are in the process of being uploaded into the HER. The DBA should also take account of readily available LiDAR data. In terms of the field surveys, paragraph 7.8.2, it should be noted that not all the area is forested, any areas where felling has already taken place or where replanting has relatively recently occurred should be subject to a walkover survey. Post felling, a walkover survey is expected (as per comments provided on application ENQ/2024/0148). Finally, in relation to paragraph 7.9 'Issues Scoped Out' it states "There will be no construction works associated with the Proposed Development beyond the Site." - does this take account of transportation route and compensatory planting zones?

Date Consulted: 14 August 2024

Environment and Infrastructure Services – Built Heritage has provided the following comments. As highlighted in the previous response, historic assets within 5km should be assessed for potential impact. These would include Kirkton of Fetteresso Conservation Area and the approximately 30 listed buildings within 5km of the application site. In particular, the category 'A' listed Fetteresso Castle Doocot (Historic Environment Scotland Reference LB9371) and category 'A' listed Castle of Fiddes (Historic Environment Scotland Reference LB6753). As stated previously, Castle of Fiddes is located approximately 5.5km to the south of the application site however, Built Heritage would ask that this is included in the assessment along with Glenbervie House Gardens and Designed Landscape (Historic Environment Scotland Reference GDL00194), which is located approximately 5.3km to the south west of the application site.

As stated in the report, the Zone of Theoretical Visibility (ZTV) does not take into account houses or trees which would provide further screening as there is significant tree coverage in this area. Notwithstanding this, Built Heritage need to be satisfied that there is limited potential for the development to impact on any nationally designated heritage asset. Therefore, please can the Applicant extend the Landscape Visual Impact Assessment (LVIA) study area to 5km to show the historic assets within this area and update the ZTV accordingly. Photomontage visualisations would also be expected for any assets identified within the assessment which could be impacted as a result of the proposed works.

Date Consulted: 14 August 2024

Environment and Infrastructure Services – Contaminated Land has commented that the Service would expect any EIA for the site to include consideration of the site history and whether that history may have been a source of contamination.

Date Consulted: 12 August 2024

Environment and Infrastructure Services – Environmental Health has considered existing water supplies, noise and dust and is satisfied that having looked at the proposed methodologies contained in the EIA Scoping Report (dated August 2024) that there should be sufficient information provided for my service to make comment on the areas of interest we are responsible for when we consulted on the full Planning Application.

The report mentions that there will be welfare provisions on site during the construction phase (and possibly thereafter) and we would ask that details of the proposed water supply be provided.

Date Consulted: 14 August 2024

Environment and Infrastructure Services – Flood Risk and Coast Protection has commented that a Drainage Impact Assessment would be required and that a Flood Risk Assessment may be required. The Service has no further comment to make at this stage.

Date Consulted: 14 August 2024

Environment and Infrastructure Services - Natural Environment has confirmed that all necessary issues are addressed within the scoping report. Consideration of the impacts during should include any impacts resulting from the need to improve access to the site. Compensatory planting is outwith the scope of the EIA but will need to be addressed, including an assessment of the ground on which this is to be provided to ensure no loss of existing biodiversity or other features of value. The proposed scope of the issues outlined in the ecology chapter is acceptable. Invasive non-native species are unlikely to be present in this location but should be recorded if found during any habitat or species surveys. The requirements for biodiversity net gain are to be considered as part of the EIA and any habitats created and species used should be relevant to the local area and the soil conditions on site. SuDS features, riparian zones and proposed landscaping may provide opportunities for habitat creation or enhancement. Access has been scoped out of the EIA but as stated an Access Management Plan will be required for both development and operational phases of the development.

Environment and Infrastructure Services – Roads Development has commented that The Environmental Impact Assessment (EIA) should ensure it considers the overall impact

of the project life cycle and the associated impact on Aberdeenshire Council's public road network.

Condition Surveys, traffic surveys and route appraisals will be required for all routes associated with the delivery of the project from the boundaries of the trunk road network (or neighbouring Council network) as appropriate. This includes the routes identified in 11.2.3 within the Scoping Report (August 2024) on page 82.

It should be noted that the redline boundary of the site identified still includes the U115K public road network section and its linkage to the C1K. Roads Development noted concerns about this road corridor (C1K-U115K) in previous correspondence, this should be considered and amended accordingly as part of any future formal applications.

From a public road perspective as part of this EIA a review will likely be required of the following (this list is non-exhaustive); existing road widths, passing provisions, construction makeup, drainage, visibility, junction radii, road markings, and statutory undertaker's plant.

The resulting review may result in requirements for road widening, passing provision, junction radii increases, edge strengthening, drainage solutions, street furniture relocation, and statutory undertaker's plant rerouting or lowering as part of the proposals of the overall development, along with the remedial works to reinstate these elements.

A Transport Assessment is required for the development, a reduced scope as noted in 11.3.3 is in principle acceptable, and dialogue should be made with Roads Development in conjunction with this.

Applicant should consider the Roads Development comments within this section and those included within ENQ/2024/0148 during the EIA process.

Date Consulted: 14 August 2024

External consultations

Carol Anderson Landscape Associates has commented that the application area is substantial. The description of the proposal in the EIA should confirm the management of forestry within this area and, in particular, the use of long-term retention of trees to provide screening of the lower components of the substation (this is not described in the Landscape and Visual Amenity section of the Scoping Report). Clear plans showing the design of the proposal and the mitigation measures proposed within the application site should be provided. These should show the retention and management of forestry around the substation including proposed earth bunding and other planting proposals.

The extent of the study areas defined for the Landscape and Visual Impact Assessment (LVIA) set out in the Scoping Report are appropriate. We welcome the approach to the design of earth bunding and planting outlined in paragraph 6.6.2 of the Scoping Report. We request that the applicant commits to planting hedgerows, field trees and woodlands

off-site with the aim of not just providing 'Additional Mitigation' in screening views, for example, but also providing more general landscape and biodiversity enhancement as required by NPF4.

We also welcome the opportunity to contribute to the consultation to be undertaken to determine other developments to be considered in the cumulative LVIA.

The provisional representative assessment viewpoints listed in Table 6.2 of the Scoping Report are acceptable but consideration should also be given to defining additional representative viewpoint(s) from recreational routes within Fetteresso Forest (if open views occur) where potential receptors are identified in paragraph 6.7.7 of the Scoping Report.

Date Consulted: 14 August 2024

Historic Environment Scotland has identified likely significant effects on their historic environment interests and details are contained within the full response which is appended.

Date Consulted: 14 August 2024

NatureScot has commented are content with the proposed scope of the survey and assessment. Of the issues relevant to our remit, we agree with the issues to scoped out. We would refer the Applicant to our EIA Handbook for scoping advice and our standing advice for consultations that could affect protected species. The latter provides guidance on the issues that developers and their consultants should consider regarding their legal protection, licensing requirements, when and how to carry out surveys, and a list of measures that can be taken to minimise impacts. We are not aware of any additional information we hold that would further assist the Applicant. This advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

Date Consulted: 14 August 2024

Scottish Forestry generally welcomes the developers commitment within the Scoping Report to ensure that any proposed changes to woodland address the requirements of the Control of Woodland Removal Policy and other relevant guidance. Detailed comments are provided in the appendices.

Date Consulted: 12 August 2024

Scottish Water – has no objection to this proposal and has confirmed that there are no Scottish Water drinking water catchments or water abrasion sources which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Date Consulted: 12 August 2024

Scottish Environment Protection Agency – confirms that it has no objection to the topics identified to be Scoped in/Scoped-out, nor to the information proposed to be submitted in the future EIAR.

Date Consulted: 12 August 2024

I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.

This opinion will be held for public inspection for a two year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.

Yours faithfully



Paul Macari
Head of Planning and Economy

Appendix A – Archaeology

From: [Claire Herbert](#)
To: [Planning Online](#)
Subject: Consultation for Ref No ENQ/2024/1176 - Archaeology response
Date: 23 August 2024 11:41:57

ENQ/2024/1176
EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land At Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX
Grid Reference: 378395.786891

Thank you for consulting us on the above EIA Screening/Scoping Opinion. Having reviewed the EIA Scoping Report (August 2024) with particular reference to Section 7 Cultural Heritage and Archaeology, I have the following comments to make:

7.2 Study Area

Cultural Heritage Assessment for potential historic environment impacts should include an assessment of the transportation route to site (as specified in response to application ENQ/2024/0148) and for any identified compensatory planting zones.

7.3.2 Check this paragraph iro site visits - I assume this is meant to say September 2023? Or are further site visits planned in September 2024? Would be helpful to clarify this point.

7.8.1 Desk based assessment

- Please be advised there have been recent updates to the Aberdeenshire HER data for the primary development area. We realised that FLS/FCS archaeological survey data had not been added - this has now been uploaded for the red line development area. Note there are further sites recorded throughout Fetteresso Forest, these are in the process of being uploaded into the HER.
- The DBA should also take account of readily available LiDAR data

7.8.2 Field Surveys

- Not all of the area is forested; any areas where felling has already taken place or where replanting has relatively recently occurred should be subject to walkover survey.
- Post felling, a walkover survey is expected (as per comments provided on application ENQ/2024/0148)

7.9 Issues Scoped Out: "There will be no construction works associated with the Proposed Development beyond the Site." - does this take account of transportation route and compensatory planting zones?

The above comments apply to the current enquiry only.

Should you have any comments or queries regarding the above, please do not hesitate to contact me.

Appendix B – Built Heritage

Built Heritage Consultation Response

Planning Reference No:	ENQ/2024/1176 Land at Fetteresso Forest, Stonehaven
Environment Planner:	VG
Date of Response:	23/08/2024

<input type="checkbox"/>	Acceptable
<input type="checkbox"/>	Holding Objection
<input type="checkbox"/>	Objection
<input type="checkbox"/>	Acceptable Subject to Following Action
<input type="checkbox"/>	No Comments
<input checked="" type="checkbox"/>	Further Information Required

1.	Issue:	Impact of the proposal on historic assets
	Actions:	
	a)	
	Justification:	<ul style="list-style-type: none"> • NPF 4 Historic Assets and Places Policy 7 • ALDP 2023 Policy HE1: Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings) • ALDP 2023 Policy HE2: Protecting Historic, Cultural and Conservation Areas • Historic Environment Scotland - Managing Change in the Historic Environment: Setting (February 2020) https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549
	Supporting Statement:	<p>It is noted that the EIA scoping report shows historic assets within 3km of the proposed substation which is identified as the 'Outer Study Area'. Within the report, Section 7.2.1 states that '<i>Consideration will also be given to identifying designated heritage assets beyond 3 km where long-distance views and intervisibility are considered to be an important aspect of their setting</i>'.</p> <p>As highlighted in the previous response, historic assets within 5km should be assessed for potential impact. These would include Kirkton of</p>

Fetteresso Conservation Area and the approximately 30 listed buildings within 5km of the application site. In particular, the category 'A' listed Fetteresso Castle Doocot (Historic Environment Scotland Reference LB9371) and category 'A' listed Castle of Fiddes (Historic Environment Scotland Reference LB6753). As stated previously, Castle of Fiddes is located approximately 5.5km to the south of the application site however, Built Heritage would ask that this is included in the assessment along with Glenbervie House Gardens and Designed Landscape (Historic Environment Scotland Reference GDL00194), which is located approximately 5.3km to the south west of the application site.

As stated in the report, the Zone of Theoretical Visibility (ZTV) does not take into account houses or trees which would provide further screening as there is significant tree coverage in this area. Notwithstanding this, Built Heritage need to be satisfied that there is limited potential for the development to impact on any nationally designated heritage asset. Therefore, please can the Applicant extend the Landscape Visual Impact Assessment (LVIA) study area to 5km to show the historic assets within this area and update the ZTV accordingly. Photomontage visualisations would also be expected for any assets identified within the assessment which could be impacted as a result of the proposed works.

Appendix C – Contaminated Land

Archived: 03 September 2024 11:22:42
From: [Peter Exon](#)
Sent: Tue, 3 Sep 2024 09:53:33
To: [Planning Online](#)
Subject: RE: Consultation for Ref No ENQ/2024/1176
Sensitivity: Normal

ENQ/2024/1176 EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land At Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX

Environmental Protection Act 1990: Part IIA Contaminated Land

Thank you for consulting us on this enquiry.

Since no plan of the site has been provided nor has the site boundary been included on the Council GIS system, this Service can only produce a provisional response based upon the boundary of ENQ/2024/0146.

This Service will expect any EIA for the site to include consideration of the site history and whether that history may have been a source of contaminative risk to the development.

I have no further comment to make on this enquiry.

Regards,

Peter Exon

Assistant Scientific Officer

Appendix D – Environmental Health



PLANNING CONSULTATION

RECOMMENDATION:

APPLICATION REF: ENQ/2024/1176
PROPOSAL: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of 400KV AC Substation and Associated Infrastructure (National Development)
LOCATION: Land At Fetteresso Forest, Stonehaven
Aberdeenshire
AB39 3UX
AGENT:
DATE RECEIVED BY EH: 12 August 2024

Environmental Health Service has considered the following in respect of the above Planning Enquiry

Existing Water Supplies
Noise
Dust

I have looked at the proposed methodologies contained in the Environmental Impact Assessment (EIA) Scoping Report dated August 2024 and would state that there should be sufficient information provided for my service to make comment on the areas of interest we are responsible for when we consulted on the full Planning Application.

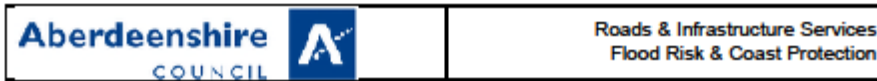
The report mentions that there will welfare provisions on site during the construction phase (and possibly thereafter) and we would ask that details of the proposed water supply be provided.

Regards

Peter Fowler
Senior Environmental Health Officer
Date:

Please note that the above observations do not include consideration of contaminated land issues. The Scientific Officer, Environment and

Appendix E – Flood Risk and Coast Protection



Consultee: Flood Risk and Coast Protection

Planning Reference: ENQ/2024/1176

Case Officer Name: Stephanie McMillan

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land At Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX

Grid Reference: 378395.786891

We refer to your email dated 12/08/24 regarding the above enquiry. We note that full drainage details have not yet been provided and therefore have the following comments with regards surface water drainage and associated flood risk: -

1. A Drainage Impact Assessment/Drainage Statement, prepared in accordance with Council Guidelines would be required. This should cover all potential phases of the application;
2. If surface water soakaways are to be used to disperse of surface water; testing and sizing calculations should be done by a suitably competent person and in accordance with BRE Digest 365 or Ciria Project Report 23. Consideration should also be made to the location of the soakaways to ensure a minimum distance of 5m from any building foundations or boundaries;
3. If infiltration testing proves that ground is impervious then suitable attenuation calculations should be provided to prove that on-site surface water drainage system has adequate storage capacity for a 30 year return period rainfall event. Prior to a controlled discharge into either an available watercourse or public sewer (to be agreed with Scottish Water), controlled as a minimum to the pre-development runoff rate. As such, the pre-development runoff rate should be confirmed and a reduction made for any areas not included in the drainage design i.e. areas within the site application boundary that are to be left undeveloped;
4. Soakaway or Attenuation System construction details to be provided (including discharge control if necessary);
5. A statement on how future maintenance of the proposed drainage system will be performed and confirmation of who will be responsible;
6. Confirmation that any existing site or field drainage will be located and suitably altered, if indeed disturbed;
7. All calculations must be approved and certified by a suitably qualified person;
8. To fully consider flood risk to the site the applicant may need to submit a Flood Risk Assessment (FRA) which must consider flood risk from all sources. This would need to be undertaken in accordance with the current version of SEPAs Technical Flood Risk Guidance for Stakeholders – SEPA requirements for undertaking a Flood Risk Assessment;

Appendix F – Natural Environment

Natural Environment Team Enquiry Consultation Response

Planning Reference No:	ENQ/2024/1176
Environment Planner:	JC
Date of Response:	13/08/2024

Issue 1:	Forest and woodland
Actions:	
a)	All necessary issues are addressed within the scoping report. Consideration of the impacts during should include any impacts resulting from the need to improve access to the site.
b)	Compensatory planting is outwith the scope of the EIA but will need to be addressed, including an assessment of the ground on which this is to be provided to ensure no loss of existing biodiversity or other features of value.
c)	
Supporting Information:	

Issue 2:	Ecology
Actions:	
a)	The proposed scope of the issues outlined in the ecology chapter is acceptable. Invasive non-native species are unlikely to be present in this location but should be recorded if found during any habitat or species surveys.
b)	The requirements for biodiversity net gain are to be considered as part of the EIA and any habitats created and species used should be relevant to the local area and the soil conditions on site. SuDS features, riparian zones and proposed landscaping may provide opportunities for habitat creation or enhancement.
c)	
Supporting Information:	
https://publications.aberdeenshire.gov.uk/dataset/0ceb7c55-b43d-45c4-a311-798f4bc9fa75/resource/23b62057-7a3c-4010-a471-e46c01bbb8a4/download/pa2023-17—planning-advice—baseline-ecological-survey.pdf	

Issue 3:	Access
Actions:	
a)	Access has been scoped out of the EIA but as stated an Access Management Plan will be required for both development and operational phases of the development.
b)	
c)	
Supporting Information: https://publications.aberdeenshire.gov.uk/dataset/0ceb7c55-b43d-45c4-a311-798f4bc9fa75/resource/f52fb230-327a-4cd0-8621-1533392ab517/download/pa2023-12---planning-advice---outdoor-access--development.pdf	

Appendix G – Roads Development



Infrastructure Services
Roads Development

Technical Consultation No 1 for Planning Application Ref: ENQ/2024/1176

Application type: ENQ (Pre-Application Enquiry)

Proposal: **The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of 400kV AC Substation and Associated Infrastructure (National Development)**

Location: **Land At Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX**

Date consultation request received: 12/08/2024

Planning Officer: **SM**

Roads Officer: **MN**

1. Visibility Requirements (See Section 4)

Speed Limit at site: **mph**

Design speed: **mph** () for ()

Based on the minimum visibility requirements within Aberdeenshire Council's current standards and on the design speed a visibility of metres by metres will be required

Does current application provide this? Yes No

2. Parking Requirements:(Not Applicable)

From Aberdeenshire Council's Parking Standards the required parking provision is
Spaces made up of: Operational and Non-Operational.

Is shown provision of spaces acceptable Yes No

Note:

3. Road Layout:

Is a Traffic Assessment required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Access onto Public Road Network?	Direct	<input checked="" type="checkbox"/>	Indirect	<input checked="" type="checkbox"/>
Will the Shown Layout Require RCC?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Does the Shown Layout Appear to Comply with RCC?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

If No, What are Main Items of Non-Compliance?

4. Other Comments:

The Environmental Impact Assessment (EIA) should ensure it considers the overall impact of the project life cycle and the associated impact on Aberdeenshire Council's public road network.

Condition Surveys, traffic surveys and route appraisals will be required for all routes associated with the delivery of the project from the boundaries of the trunk road network (or neighbouring Council network) as appropriate. This includes the routes identified in 11.2.3 within the Scoping Report (August 2024) on page 82.

It should be noted that the redline boundary of the site identified still includes the U115K public road network section and its' linkage to the C1K. Roads Development noted concerns about this road corridor (C1K-U115K) in previous correspondence, this should be considered and amended accordingly as part of any future formal applications.

From a public road perspective as part of this EIA a review will likely be required of the following (this list is non-exhaustive); existing road widths, passing provisions, construction makeup, drainage, visibility, junction radii, road markings, and statutory undertaker's plant. The resulting review may result in requirements for road widening, passing provision, junction radii increases, edge strengthening, drainage solutions, street furniture relocation, and statutory undertaker's plant rerouting or lowering as part of the proposals of the overall development, along with the remedial works to reinstate these elements.

A Transport Assessment is required for the development, a reduced scope as noted in 11.3.3 is in principle acceptable, and dialogue should be made with Roads Development in conjunction with this.

Applicant should consider the Roads Development comments within this section and those included within ENQ/2024/0148 during the EIA process.

5. Recommendations:



This Service has the above comments to make on this enquiry .

Initialed by: *AN*

Date: 30/08/2024

Appendix H – Historic Environment Scotland



By email:
planning@aberdeenshire.gov.uk

Kincardine & Meams Team
Aberdeenshire Council

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300062364
Your ref: ENQ/2024/1176
22 August 2024

Dear Aberdeenshire Council

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Land At Fetteresso Forest, Stonehaven, Aberdeenshire - Erection of 400kV AC Substation and Associated Infrastructure (Hurle 400kV Substation)
Scoping Opinion

Thank you for you consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 12 August 2024. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

Your own archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed development

We understand that the proposed development comprises a new outdoor Air Insulated Switchgear (AIS) 400 kV substation including shunt reactors, transformers, connection bays and gantries, and four terminal connection towers at a height of approximately 60m on average, substation control buildings, security fencing, screening bunds and planting and temporary construction compounds.

Scope of assessment

We recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts.

We have identified likely significant effects on our historic environment interests. Our advice on the nature of these impacts, and any potential mitigation measures, are

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH
Scottish Charity No. SC045925
VAT No. GB 221 8680 15

Appendix I – Landscape Consultant

Proposed 400kV Hurlie substation - Scoping Response – Landscape and visual matters

The application area is substantial. The description of the proposal in the EIA should confirm the management of forestry within this area and, in particular, the use of long-term retention of trees to provide screening of the lower components of the substation (this is not described in the Landscape and Visual Amenity section of the Scoping Report). Clear plans showing the design of the proposal and the mitigation measures proposed within the application site should be provided. These should show the retention and management of forestry around the substation including proposed earth bunding and other planting proposals.

The extent of the study areas defined for the Landscape and Visual Impact Assessment (LVIA) set out in the Scoping Report are appropriate.

We welcome the approach to the design of earth bunding and planting outlined in paragraph 6.6.2 of the Scoping Report. We request that the applicant commits to planting hedgerows, field trees and woodlands off-site with the aim of not just providing 'Additional Mitigation' in screening views, for example, but also providing more general landscape and biodiversity enhancement as required by NPF4.

We also welcome the opportunity to contribute to the consultation to be undertaken to determine other developments to be considered in the cumulative LVIA.

The provisional representative assessment viewpoints listed in Table 6.2 of the Scoping Report are acceptable but consideration should also be given to defining additional representative viewpoint(s) from recreational routes within Fetteresso Forest (if open views occur) where potential receptors are identified in paragraph 6.7.7 of the Scoping Report.

Appendix J - NatureScot



Stephanie McMillan
Aberdeenshire Council
By email to: planning@aberdeenshire.gov.uk

06 September 2024

Our ref:

Your ref: ENQ/2024/1176

Dear Stephanie,

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

ENQ/2024/1176 - SCOPING OPINION REQUEST - ERECTION OF 400KV AC SUBSTATION AND ASSOCIATED INFRASTRUCTURE (NATIONAL DEVELOPMENT) AT LAND AT FETTERESSO FOREST, STONEHAVEN, ABERDEENSHIRE, AB39 3UX

Thank you for your consultation and for providing a copy of the Applicant's EIA Scoping Report.

NatureScot Advice

We are content with the proposed scope of the survey and assessment. Of the issues relevant to our remit, we agree with the issues to be scoped out. We would refer the Applicant to our [EIA Handbook](#) for scoping advice and our [standing advice for consultations that could affect protected species](#). The latter provides guidance on the issues that developers and their consultants should consider regarding their legal protection, licensing requirements, when and how to carry out surveys, and a list of measures that can be taken to minimise impacts. We are not aware of any additional information we hold that would further assist the Applicant.

Concluding Remarks

This advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Inverdee House, Baxter Street, Torry, Aberdeen AB11 9QA
Taigh Inbhir Dhè, Sràid Baxter, Torraidh, Obar Dheathain AB11 9QA

01224 266500 nature.scot

NatureScot is the operating name of Scottish Natural Heritage

Yours sincerely,

Katie Bain
Planning Adviser
Central Highlands / North

Inverdee House, Baxter Street, Torry, Aberdeen AB11 9QA
Taigh Inbhir Dhè, Sràid Baxter, Torraidh, Obar Dheathain AB11 9QA
01224 266500 nature.scot

NatureScot is the operating name of Scottish Natural Heritage

Appendix K – Scottish Forestry



Grampian Conservancy
Portsoy Road
Huntly
Aberdeenshire
AB54 4SJ

Email: grampian.cons@forestry.gov.scot
Tel: 0300 067 6210

Conservator: Steven Hutcheon

27th August 2024

Kincardine & Mearns Team
Aberdeenshire Council

by email: planning@aberdeenshire.gov.uk

Dear Mr Macari,

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED - Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land At Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX Grid Reference: 378395.786891

Thank you for consulting Scottish Forestry on the Scoping Report for the proposed Erection of 400kV AC Substation and Associated Infrastructure (National Development) at Land At Fetteresso Forest, Scottish Forestry is the Scottish Government agency responsible for policy, support and regulation of the forestry sector in Scotland. As such we comment on the potential impact of development proposals on forests and woodlands.

The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources.

<https://forestry.gov.scot/support-regulations/control-of-woodland-removal>

In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.

The following criteria for determining the acceptability of woodland removal should be considered relevant to this application –

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation

Se Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd



- **Woodland removal with a need for compensatory planting**
Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed.

National Planning Framework 4 - Policy 6 Forestry, Woodlands and trees identifies several themes that should be considered relevant to this application –

c) 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.

d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.

Conclusion

Scottish Forestry welcomes the developers commitment within the Scoping Report to ensure that any proposed changes to woodland address the requirements of the Control of Woodland Removal Policy and other relevant guidance.

Scottish Government's policy on control of woodland removal: implementation guidance February 2019 <https://forestry.gov.scot/support-regulations/control-of-woodland-removal> provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help us reach an informed decision on the potential impact of the proposed development.

Scottish Forestry acknowledges the developers commitment to include detailed information on the types and areas of forestry to be felled and restocked as a result of the proposed development. Detailed information on any compensatory planting proposals should also be provided. All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard. <https://forestry.gov.scot/sustainable-forestry/ukfs-scotland>

Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in the form of LTFP amendment. <https://forestry.gov.scot/support-regulations/felling-permissions>

The applicant should note that any compensatory planting required as a result of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. <https://forestry.gov.scot/support-regulations/environmental-impact-assessment> and should follow the process for preparing a woodland creation proposal, as set out in our guidance booklet: Woodland Creation Application Guidance. <https://forestry.gov.scot/support-regulations/woodland-creation>

Please do not hesitate to contact me if you have any questions regarding Scottish Forestry's response.

Yours sincerely



John Mackie

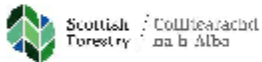
Operations Manager
Scottish Forestry
Grampian Conservancy | Portsoy Road | Huntly | AB54 4SJ
Switchboard: 0300 067 6210

Mobile: 07900135062

Email: john.mackie@forestry.gov.scot

Website: forestry.gov.scot

Twitter: [@scotforestry](https://twitter.com/scotforestry)



Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

Appendix L – SEPA

From: Planning.North <Planning.North@sepa.org.uk>
Sent: 21 August 2024 14:29
To: Planning Online
Subject: PCS-20002642 SEPA Response to ENQ/2024/1176

To Whom It May Concern,

SEPA Ref: PCS-20002642
Town and Country Planning (Scotland) Acts
ENQ/2024/1176 - EIA Screening/Scoping Opinion for Scoping Opinion Request - Erection of
400kV AC Substation and Associated Infrastructure (National Development)
Land at Fetteresso Forest, Stonehaven, Aberdeenshire, AB39 3UX

Thank you for your consultation email dated 12 August regarding the above pre-application enquiry.

SEPA confirms, in relation to its interests, it has no objection to the topics identified to be Scoped-in/Scoped-out, nor to the information proposed to be submitted in the future Environmental Impact Assessment Report.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,
Zoe Griffin
Senior Planning Officer



For the future of our environment

Disclaimer

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient, please notify us immediately by return email to postmaster@sepa.org.uk. Registered office: SEPA, Angus Smith Building, 6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ. Communications with SEPA may be monitored or recorded or released in order to secure the effective operation of the system and for other lawful purposes.

Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhaid le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghèidheadh agus airson adhbharan laghail eile.



Appendix M – Scottish Water

Monday, 19 August 2024



Local Planner
Planning and Environment Service
Aberdeenshire Council
Stonehaven
AB39 2DQ

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbemauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

Land at, Fetteresso Forest, Stonehaven, AB39 3UX
Planning Ref: ENQ/2024/1176
Our Ref: DSCAS-0115806-RRR
Proposal: EIA Screening/Scoping Opinion for Scoping Opinion Request -
Erection of 400kV AC Substation and Associated Infrastructure (National
Development)

Please quote our reference in all future correspondence

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and->

SW Public
General

Yours faithfully



Paul Macari
Head of Planning and Economy