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Scotland's Nature Agency
Buidheann Nàdair na h-Alba

[REDACTED]
Planner – Energy Team
Environment and Infrastructure
Aberdeenshire Council
By email: [REDACTED]@abderdeenshire.gov.uk

Our ref: CDM 181935
Your ref: APP/2025/1617
24 November 2025

Dear [REDACTED]

**The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended).
Buchan Offshore Wind – Onshore Grid Connection application**

Thank you for your consultation of 2 October 2025 requesting our advice on the above application. We apologise for the delay of this response due to resource issues and complications around an overlapping project.

Summary

This proposal could be progressed with appropriate mitigation. However, because it could affect internationally important natural heritage interests, we object to this proposal unless it is made subject to conditions, as outlined below.

Background

This proposal involves under-grounding cables (UGC), over approximately 17 km to a new substation site SW of Peterhead, which will deliver energy from Buchan Offshore Wind Farm (subject to approvals). This proposal promptly follows a similar/overlapping UGC project led by SSE (LT360), which we understand is being considered under General Permitted Development. Both projects have potential to cause in-combination/cumulative effects to Protected Areas depending on timings and spatial planning of works, etc.

Appraisal of impacts and our advice

This proposal lies close to Loch of Strathbeg Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) & Ramsar site protected for its range of wetland habitats, coastal habitats, over-wintering waterfowl and breeding birds. The lengthy underground cabling route falls within connectivity range to Ythan Estuary, Sands of Forvie & Meikle Loch SPA (Ythan Estuary & Meikle Loch Ramsar Site) protected for its range of non-breeding waterfowl and coastal breeding birds. Buchan Ness to Collieston Coast SPA, protected for its range of breeding seabirds, also lies in proximity to the southern part of the cable route, where herring gulls occasionally forage on agricultural ground.

European Sites:

The sites' status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Consequently, Aberdeenshire Council is

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required to consider the effect of the proposal on SPAs and Ramsar Sites before it can be consented (commonly known as Habitats Regulations Appraisal). The NatureScot website has a summary of the legislative requirements: <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-species/legal-framework/habitats-directive-and-habitats-regulations>.

Loch of Strathbeg Ramsar Site

- **Eutrophic Loch**

Our advice is that this proposal is likely to have a significant effect on the eutrophic loch feature of this Ramsar Site. Consequently, *Aberdeenshire Council*, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

To help you do this, we advise that based on the information provided and appraisal carried out to date, if the proposal is carried out strictly in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site:

- The finalised CEMP should include details of adequate water management /pollution prevention measures to avoid impacts to this Ramsar Site loch, during water crossings linked to underground cables and/or vehicle access routes. The CEMP will be agreed with Aberdeenshire Council, through Planning Condition Discharge well in advance of works commence.

The appraisal we carried out considered the impact of the proposal on the following:

- The Outline CEMP provides an indication of the mitigation & best practice measures that will be implemented by the contractor to ensure that water quality conditions are maintained during the works which have connectivity to this Ramsar Site.

If the planning authority intends to grant planning permission against this advice without the suggested mitigation, you must notify Scottish Ministers.

This Ramsar feature was not considered within the EIA Report (EIAR). We recognise that Ramsar Sites have only very recently attained a higher level of protection (July 2025). However, we believe the above condition, which aligns with mitigation plans provided within the EIAR, should alleviate potential impacts.

Loch of Strathbeg SPA & Ramsar Site (birds only)

- **Pink-footed geese (non-breeding)**
- **Greylag goose (non-breeding)**
- **Barnacle geese (non-breeding)**
- **Whooper Swan (non-breeding)**
- **Teal (non-breeding)**
- **Goldeneye (non-breeding)**
- **Waterfowl assemblage non-breeding - >20,000 waterfowl**

Ythan Estuary, Sands of Forvie & Meikle Loch SPA (Ythan Estuary & Meikle Loch Ramsar Site)

- **Pink-footed geese (non-breeding)**
- **Waterfowl assemblage (non-breeding) - >20,000 waterfowl**

Our advice is that this proposal is likely to have a significant effect on non-breeding waterfowl linked to both above SPA/Ramsar Sites. Consequently, *Aberdeenshire Council*, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

To help you do this, we advise that based on the information provided and appraisal carried out to date, if the proposal is carried out in accordance with the following mitigation, our conclusion is that the proposal will not adversely affect the integrity of the site:

- a) *North-east Zone*: Visual and noise-attenuating barriers will be erected around the landfall compound to reduce disturbance and displacement effects to any SPA birds attempting to forage within this favoured location. Barriers should be at least 2m in height to aid effectiveness.
- b) Mitigation identified for Loch of Strathbeg Ramsar will also ensure adequate water management /pollution prevention measures to avoid indirect impacts to the Loch of Strathbeg SPA.

The appraisal we carried out considered the impact of the proposal on the following:

- o Attempts at reducing visual and noise disturbance effects within the North-east zone will play a part in reducing overall impacts of this proposal.
- o The Outline CEMP provides an indication of the mitigation & best practice measures that will be implemented by the contractor to ensure that water quality conditions are maintained during the works which have connectivity to this Ramsar Site.

If the planning authority intends to grant planning permission against this advice without the suggested mitigation, you must notify Scottish Ministers.

We welcome that this grid connection cable route is being undergrounded, rather than introducing (additional) collision risk to SPA waterfowl from new overhead lines. Nevertheless, we agree with the EIA Report that the cable installation construction period will result in short-term disturbance and displacement effects to waterfowl outwith but connected to this SPA.

It is for the planning authority to determine, within the context of its own policies whether conditions are necessary to secure recommended mitigations (marked as #) as set out below.

The applicant identified a works start time for the North-east zone for April but did not provide further detail on this within the embedded mitigation table. Therefore, we advise that:

- # Works carried out at the favoured waterfowl area (north-east zone) should be completed by 30 November, including all ground reinstatement, allowing SPA waterfowl to return during the mid-winter period, when forage resources are at a premium. Thus, the start date (in spring) should be informed by this completion date, taking into consideration the 8-month working period required for this zone (to also include a fall-back for down-time).

The practicalities of this proposal combined with LT360 generates complexities in practical project delivery (over the 2–3-year construction period). Therefore, we advise that an approach is developed to address this, as follows:

- # SSE & Natural Power collaborate to develop and adopt a Joint Works Co-ordination Plan (JWCP) for approval by Aberdeenshire Council & NatureScot. The JWCP would aim to reduce cumulative/in-combination disturbance and displacement effects to SPA waterfowl & attempt to align mitigation measures for both developments, including spatial/zonal work planning, timings, non-disturbance areas for mid-winter periods and special contingency measures for extreme weather events, including prolonged/extreme cold weather periods (i.e. JNCC/BASC severe weather status for waterfowl).

The JWCP is particularly relevant to the north where both projects overlap, but we encourage this novel approach to subsume the full development boundaries of both proposals. We can provide further advice to assist in its development if required, please contact this case officer.

Buchan Ness to Collieston Coast SPA

- **Herring gull (breeding)**

Our advice is that this proposal is likely to have a significant effect on herring gull linked to this SPA. Consequently, *Aberdeenshire Council* as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interest.

To help you do this we advise that based on the *information provided and appraisal carried out to date*, our conclusion is that the proposal will not adversely affect the integrity of the site. The appraisal we carried out considered the impact of the proposals on the following:

- Although this species was recorded during survey work in the summer, recent survey works suggests it prefers coastal areas and landfill sites, whilst also favouring urban locations. Agricultural areas provide forage that is of lower value to herring gulls compared to its favoured habitats.
- The underground cabling route will be temporary, where restoration will put back agricultural ground back to baseline. The footprint of the substation is relatively small-scale (c. 8ha.) in context to the foraging resource/habitats that are available over such a very extensive foraging range along the NE Scotland coastal zone.

Nationally Important Sites

Loch of Strathbeg SSSI

- **Breeding bird assemblage (lowland open waters and their margins)**
- **Eutrophic Loch**
- **Fen meadow and Open water transition fen**
- **Waterfowl features (non-breeding)**, see Loch of Strathbeg SPA as above.

This proposal could be progressed with mitigation measures. However, the proposal could adversely affect natural heritage interests of national importance, and we therefore object to it unless it is made subject to the measures as set out below:

- The finalised CEMP should include details of adequate water management /pollution prevention measures to avoid impacts to this loch, during water crossings linked to underground cables and/or vehicle access routes. The CEMP will be agreed with Aberdeenshire Council, through Planning Condition Discharge well in advance of works commence.

If the planning authority is minded granting planning permission without the conditions recommended above, the case must be notified to Scottish Ministers.

- **Coastal geomorphology and sand dunes**

As cables make landfall, there is clearly overlap over the issue of horizontal directional drilling (HDD) being considered for both marine and terrestrial (see Fig. 3.1, Non-technical Summary, PDF page 16). Therefore, we copy you our main advice to Marine Directorate for the Buchan Offshore Wind Farm (dated 1 October 2025), for these SSSI features¹, see:

- *The EIA assessment for marine and coastal physical processes concludes no significant impacts, both alone and cumulatively – we broadly agree with these conclusions **subject to clarifications and with commitment to the Horizontal Directional Drill (HDD) landfall installation method**. This would also avoid compromising the objectives of the designation and overall integrity of the Loch of Strathbeg Site of Special Scientific Interest (SSSI) coastal geomorphological feature.*

Other Protected Species

For standing best practice advice on wider countryside breeding birds and mammals, see; <https://www.nature.scot/doc/standing-advice-planning-consultations-birds>, and <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents>.

¹ More detail is presented within our full wind farm response (from page 71), but this relates more to marine issues.

Concluding remarks

We ask to be advised at the earliest opportunity about any proposed modifications, conditions or legal agreements relevant to our interests.

Please let [REDACTED] [@nature.scot](mailto:[REDACTED]@nature.scot) know if you require any further information or advice from us in relation to this application.

Yours sincerely,

[REDACTED]
Operations Manager – North