



Westfield Substation Extension

Planning Statement

September 2026

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Plans Planning Statement

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Preface

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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[Tealing to Kincardine Upgrade Project - SP Energy Networks](#)

Document Control

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01.

Introduction

1. Introduction

1.1 Context

- 1.1.1 This Planning Statement has been prepared by Stantec on behalf of SP Energy Networks (SPEN) (the 'Applicant'). It relates to proposals to reinforce the electricity transmission infrastructure in Fife, in particular for an extension to the existing Westfield Substation, Cardenden near Lochgelly, KY5 OHQ (the Proposed Development), as part of the Tealing to Kincardine Upgrade Project (TKUP).
- 1.1.2 The Proposed Development is located immediately west of the existing 275/132kV Westfield substation at central grid reference 319213, 697641.
- 1.1.3 The existing Westfield 275/132kV substation is connected to the transmission network by overhead lines operating at both 275kV and 132kV. It is an outdoor substation, which utilises Air Insulated Switchgear (AIS) with both 275kV and 132kV busbar systems.
- 1.1.4 Following the completion of the construction and electrification of the Proposed Development adjacent to the existing Westfield substation, the existing Air Insulated (AIS) 275 kV substation will be decommissioned and deconstructed.

1.2 Background to the Project

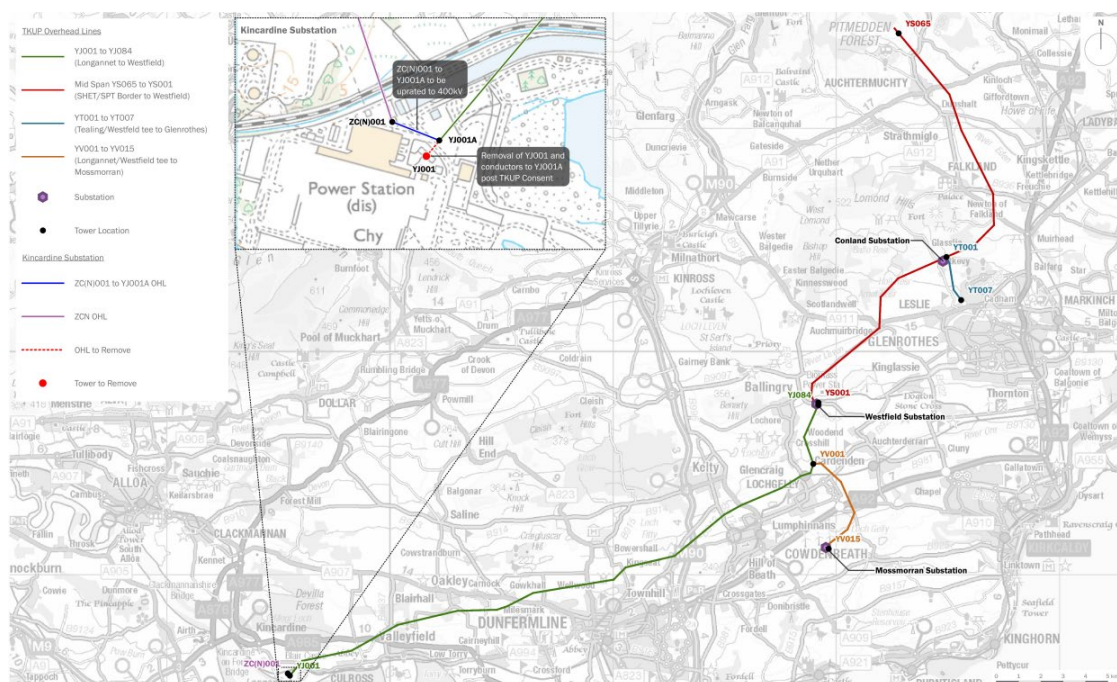
- 1.2.1 The UK's British Energy Security Strategy outlines the government's goal to have 50GW of offshore wind capacity connected to the UK transmission network by 2030. The Pathway to 2030 Holistic Network Design (HND) (NGESO, 2022) and Network Options Assessment (NOA) recommends the optimal onshore transmission network required to connect offshore windfarms to shore as well as transporting the power to where it will be used. This is supported by the Accelerated Strategic Transmission Investment (ASTI) framework, which provides a new regulatory framework to fund the large strategic onshore transmission projects required to deliver the 2030 ambitions.
- 1.2.2 Across the Central Belt of Scotland and across the Anglo-Scottish Border, high power transmission from north to south is required. Expected increases in onshore and offshore wind generation confirm the need to deliver significant additional transmission capacity through central and southern Scotland in the period to the end of the current decade and beyond. Therefore, growing north to south power transfer requirement across each of the SP Transmission (SPT) network boundaries is required, driving the need for significant transmission reinforcement.
- 1.2.3 HND essential reinforcements in this area include (i) thermal and voltage uprating of the existing YJ, YS and YV overhead line routes via replacement of the existing (mainly 1969 and 1973 vintage) twin Zebra ACSR overhead line conductor systems – modernising existing overhead line routes and maximising their capacity; and (ii) associated substation works, including the establishment of Westfield 400/132kV Substation, Mossmorran 400/132kV Substation and Conland 400/275kV Substation as part of the East Coast Onshore 400kV Phase 2 Reinforcement (NOA ref. TKUP). the uprating to 400kV of onshore overhead line circuits from Kintore to Tealing on the east coast, identified as the 'East Coast Onshore 400kV Phase 2 Reinforcement (Reference NOA7, Code TKUP), known as the Tealing to Kincardine Upgrade Project (TKUP). It includes upgrading to 400kV the

Alyth to Longannet 275kV route, which passes through Glenrothes, Westfield and Mossmorran. As a result, new 400/132kV transformers will be required near to the convergent points of YJ and YS overhead line routes, which is adjacent to the existing Westfield substation. at the existing Westfield substation. In order to achieve this, an extension to the existing 275/132kV substation is required. These works will also create capacity for new 132kV transmission generation and demand connections at Westfield.

1.2.4 The East Coast Onshore 400kV Phase 2 Reinforcement will be delivered in part by SP Energy Networks (SPEN) and in part by Scottish Hydro Electric Transmission plc (SHETL), where appropriate within their transmission licence boundary areas. Where reference is made to TKUP within this Planning Statement, it refers to those reinforcements required within the SPEN transmission licence boundary area.

1.2.5 TKUP (of which the Proposed Development form's part) comprises several different elements, which all contribute to the upgrading of the electricity transmission network to provide additional grid capacity across the Fife area. The key elements are illustrated on **Figure 1.1**, and can be summarised as follows:

1. The reconductoring of the YJ, YV, and YS overhead lines and increase in voltage from 275kV to 400kV;
2. A new span of overhead line between YJ001A and ZCN001, the increase in voltage of the existing electric line between these towers and removal of tower YJ001 and the span to YJ001A;
3. Substations at 400kV to manage this increased capacity at Westfield, Mossmorran and (Conland north of Glenrothes);
4. New terminal towers adjacent to related substation infrastructure at Westfield Substation, Mossmorran Substation, and Conland Substation (north of Glenrothes);
5. Reconfiguration of existing 275kv overhead lines at these substation sites involving removal of existing towers and use of temporary masts to facilitate existing 275kv connections during construction;
6. Decommissioning of the existing 275kV substation at Westfield and decommissioning of the 275kv substation at Mossmorran; and
7. Other ancillary works including temporary road sections, temporary laydown areas for materials, landscape works, drainage, temporary work compounds and other areas of temporary hardstanding.



1.3 TKUP Project Consenting Requirements

- | | |
|-------|--|
| 1.3.1 | <p>Planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) is required for the proposed Westfield Substation extension development. Planning Permission in Principle (PPiP) is sought in order to establish the principle of the proposed use, and the maximum scale and quantum of development. The final design of the Proposed Development will be controlled by subsequent applications for Approval of Matters Specified in Conditions (AMSC), if the PPiP is granted.</p> |
| 1.3.2 | <p>The relevant consenting requirements in relation to the application site are identified in Table 1.1 below.</p> |

Table 1.1: TKUP Consenting Requirements (of relevance to the application site)

TKUP Element	Consenting Requirement
Reconfiguration of the existing 275kv overhead lines, removal of existing towers, new terminal towers and use of temporary masts associated with works at Westfield substation	Consent under Section 37 of the Electricity Act 1989 and deemed planning permission under section 57(2) of the Town and Country Planning (Scotland) Act 1997.
400kV Extension to Westfield Substation and the decommissioning of the 275kV elements of the existing Westfield Substation (the Proposed Development)	Consent under Town and Country Planning (Scotland) Act 1997 (as amended). Planning Permission in Principle Application to Fife Council (FC).

TKUP Element	Consenting Requirement
Undergrounding of length of 33kV OHL to facilitate the construction of the Westfield Substation Extension	Local Planning Application to Fife Council - separate standalone application.
Provision of Temporary SuDS to facilitate construction of the substation extension	Local Planning Application to Fife Council – separate standalone application.

1.4 The Applicant

- 1.4.1 SP Energy Networks (SPEN) is the trading name for Scottish Power Energy Networks Holdings Limited. SPEN owns and operates the electricity transmission and distribution networks in central and southern Scotland through its wholly owned subsidiaries SP Transmission plc (SPT) and SP Distribution plc. These businesses are 'asset-owner companies' holding the regulated assets and Electricity Transmission and Distribution Licenses.
- 1.4.2 SPT are the Transmission Licence holder for the south of Scotland and are required under The Electricity Act *"to develop and maintain an efficient, co-ordinated and economical system of electricity transmission"*. They are obliged to manage the electricity transmission network and provide electrical connections from energy sources, and where necessary, to upgrade the network.
- 1.4.3 In addition to its obligation to develop and maintain the electricity transmission network as noted below, they are required under Schedule 9 of The Electricity Act 1989, when formulating any relevant proposals, to have regard to the desirability of preserving the environment to do what they reasonably can to mitigate any effect which the proposals would have on the environment and to avoid, so far as possible, causing injury to fisheries or to the stock of fish in any waters.
- 1.4.4 Requirements under Section 9(2) of the Electricity Act are to:
- Develop and maintain an efficient, co-ordinated and economical system of electricity transmission; and
 - Facilitate competition in the supply and generation of electricity.
- 1.4.5 There are also obligations pursuant to the licence conditions, including:
- To make available those parts of the licensee's transmission system which are intended for the purposes of conveying, or affecting the flow of, electricity so that such parts are capable of doing so and are fit for those purposes;
 - To make the transmission system available for electricity generators wishing to connect to the transmission system in its licence area. SPT is also obliged to ensure that the system is fit for purpose through appropriate reinforcements to accommodate the contracted capacity; and
 - To plan and develop its transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and in so doing take account of the obligations of the National Energy System Operator as the independent

System Operator and Planner to co-ordinate and direct the flow of electricity on, to and over the British transmission system.

- 1.4.6 Therefore, in response to statutory and licence obligations, the Applicant are required to ensure that the transmission system is developed and maintained in an economic, co-ordinated and efficient manner in the interests of existing and future customers.

1.5 Purpose of the Planning Statement

- 1.5.1 The Town and County Planning (Scotland) Act 1997 (as amended) is the 'Principal Act' which regulates land use planning matters in Scotland. All applications for planning permission must be determined in accordance with the provisions of this legislation. Under Section 25 of this Act the determination of all planning applications must be made in accordance with the development plan applicable to the proposed site unless material considerations indicate otherwise.
- 1.5.2 The purpose of this Planning Statement is therefore to set the context and objectives for development before outlining relevant planning policies and guidance against which the application will be assessed by Fife Council (FC) as the Local Planning Authority (LPA). This statement considers how the Proposed Development will comply with the development plan, including supplementary guidance, as well as other national policies and guidance and other relevant material considerations. The statement concludes with a robust justification for granting In Principle planning permission for the Proposed Development.

1.6 Environmental Impact Assessment

- 1.6.1 The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations) implement the requirements of the European Directive on EIA into Scots law. These regulations include two Schedules, those which specify the types of proposal that should be subject to mandatory EIA (Schedule 1) and those for which the need for EIA should be determined by the relevant competent authority (Schedule 2). Further schedules also specify the criteria for determining the need for EIA and the information to be included within the resultant EIA Report.
- 1.6.2 The proposed extension to the Westfield Substation does not fall under Schedule 1 of the EIA Regulations, and therefore a mandatory EIA is not required, and does not fall within those categories listed in Schedule 2 of the EIA Regulations.
- 1.6.3 However, on the basis that the EIA Directive has a wide scope and broad purpose, a voluntary EIA is being undertaken for the proposed extension to the Westfield Substation.
- 1.6.4 An EIA Scoping Report was submitted to FC on 22 July 2024 in order to solicit a formal EIA Scoping Opinion in accordance with Regulation 17 of the EIA Regulations.
- 1.6.5 A Scoping Opinion (reference 24/01927/SCO) was provided on 9 September 2024, identifying the matters that should be addressed in the EIA Report to accompany the PPIp application.
- 1.6.6 The EIA Report and Appendices have been submitted as part of the planning application.

1.7 Hierarchy of Development

- 1.7.1 NPF4 Annex B (National Developments Statement of Need) states that “Eighteen national developments will support the delivery of our spatial strategy” This includes the “Strategic Renewable Electricity Generation and Transmission Infrastructure” category, which includes the following class of development which the Proposed Development falls under “(c) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations”.
- 1.7.2 NPF4 Annex B states that “National Development are significant developments of national importance that will help to deliver our spatial strategy”. As is stated within NPF4 Annex A, “their designation means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors”.
- 1.7.3 The Proposed Development is also classed as “essential infrastructure”, given that this is defined within NPF4 Annex B as including “all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations”.

1.8 Pre-Application Engagement

Pre-Application Discussions

- 1.8.1 The Applicant recognised the need for meaningful communication with FC and the local community prior to the submission of the planning application. As part of the progression of the Proposed Development, and from an early stage, advice has been sought from officers at FC to discuss the emerging proposals for the site and agree the supporting information required to accompany the planning application.
- 1.8.2 Pre-application discussions have been held with FC in relation to the Proposed Development (reference: 24/01931/PREAPP). This included formal pre application meetings with Scott Simpson (case officer) on 02 October 2024 and 28 February 2025.
- 1.8.3 The feedback received was positive and encouraging, and the principle of the Proposed Development was deemed to be acceptable, subject to the submission of the requested information and compliance with the relevant Development Plan policies.
- 1.8.4 Following the first formal pre application meeting, a pre-application response letter was issued by FC on 10 October 2024. Within this, the following key considerations were identified, and which have been addressed as part of the PPiP application submission:
- Principle of Development;
 - Landscape and Visual Impact;
 - Amenity Impact;
 - Community and Economic Benefits;
 - Transportation;

- Water/Drainage/Flood Risk;
- Natural Heritage including impact on Trees, Protected Species and Wildlife Habitats and Biodiversity Enhancement;
- Tackling the climate and nature crises;
- Air Quality;
- Contaminated Land; and
- Hazardous Safeguarding Zone.

1.8.5 Compliance with the relevant Development Plan policies in this respect is considered within Section 3 (Planning Policy and Assessment) of this report.

1.9 Application and Supporting Documents

1.9.1 As well as the statutory Environmental Impact Assessment Report and Planning Statement, the application is supported by the following documents

- Landscape and Visual Impact Assessment;
- Archaeology and Heritage Assessment;
- Flood Risk Assessment;
- Ground Investigation Phase 1 Desk Study;
- Ecological Appraisal Report;
- Pre-Application Consultation Report;
- Arboricultural Report;
- Air Quality Assessment;
- Transport Statement; and
- Outline Construction Environmental Management Plan.

02.

Site Context

2. Site Context

- 2.1.1 The site (**Figure 2.1** – outlined red), which amounts to approximately 16.7 hectares in area is located to the south of the B9097, approximately 0.6 km to the east of the Ballingry settlement boundary.

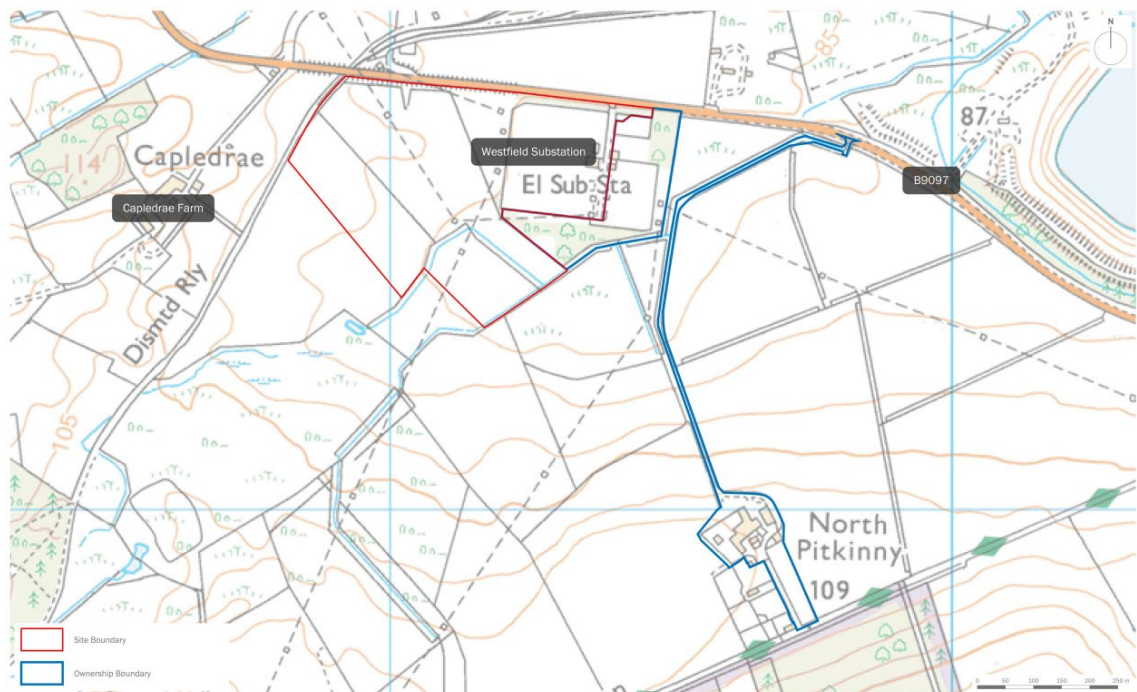


Figure 2.1: Site Location (outlined red)

- 2.1.2 Aside from the existing substation, the site is currently agricultural and relatively flat. Within the site are two existing field boundary hedgerows with trees and existing overhead powerline (OHL) steel lattice towers. It is bordered by the B9097 and roadside vegetation to the north; and a small cpse of trees to the east; further agricultural land and an existing drainage ditch to the south; and the disused railway line to the west. It includes the access from the B9097 to the existing Westfield substation.
- 2.1.3 The existing Westfield 275/132kV substation is connected to the primary transmission network by overhead lines operating at both 275kV and 132kV. It is an outdoor substation, which utilises Air Insulated Switchgear (AIS) with both 275kV and 132kV busbar systems.
- 2.1.4 Aside from the existing substation to the west, the immediate surrounding area is rural in nature. There are however a number of commercial and industrial land uses, including a historic quarry being developed as the Fife Energy Park to the north-east. The residential settlement of Ballingry is located to the west. The nearest residential property is Capleedrae Farm Cottage which is located approximately 119 metres to the west of the site.
- 2.1.5 To the south is the Fife Pilgrim Way Long Distance Walking Route (LDWR), which connects West Fife and East Fife via routes used by medieval pilgrims. There are a number of Core Paths (CPs) in proximity to the site, including the old railway route to the north-west. To the west beyond Ballingry, and to the north, are areas designated within the Lomond Hills Regional Park. Further to the north-west is the Loch Leven National Nature Reserve, Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar Wetland Designation.

Planning History

- 2.1.6 The relevant planning history for the application site and the existing adjoining substation is as follows:
- Full planning permission (01/03137/CFULL) for re-roofing of existing flat roofed substation with pitched roof within the existing substation compound - approved 19th December 2001; and
 - Full planning permission (13/01434/FULL) for the erection of switchgear enclosure building within the existing substation compound - approved 12th September 2013.
- 2.1.7 In addition to the above planning history, notification under The Overhead Lines (Exemption) (Scotland) Regulations 2013 for two spans of overhead line supported by a temporary mast between existing towers (Reference 24/03352/NEA) was accepted by FC on 9th January 2025.
- 2.1.8 Please see the TKUP Project Overview (**Figure 1.1**) submitted with this application for further information in this respect. Please note that this plan is for informational purposes only.

Planning Policy Site Designations

- 2.1.9 An extract of the proposed area taken from the FIFEplan interactive map is below. The proposed site boundary has been broadly overlaid in red).

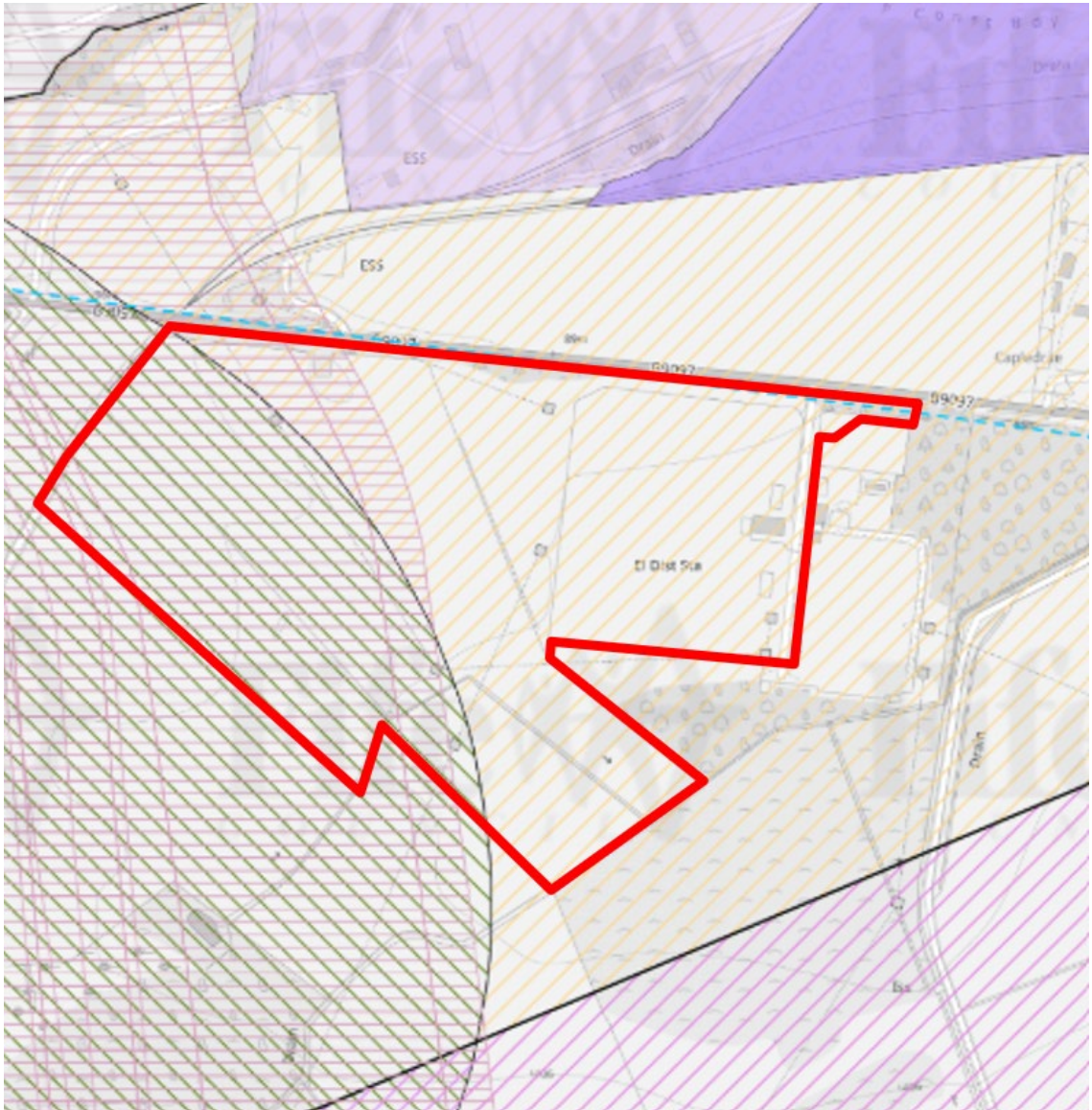


Figure 2.2: FIFEplan Policy Map Extract (site broadly outlined in red)

2.1.10 The site is subject to the following allocations/designations on the FIFEplan map:

- The area to the north of the existing facility and to the south of the B9097 is a Green Network policy area route (Westfield – Kinglassie: ref KLSGN01) - blue dashed line;
- The western half of the site is in a hazard pipe consultation zone (Shell Expro St Fergus/Mossmorran NGL Pipeline), operated by Shell UK – red dashed areas; and
- The entire site is a mineral search area – yellow (low level of protection) and black (high level of protection) dashed areas.

2.1.11 Other relevant environmental related designations are as follows:

- The site is located within an area that is shown as a surface water flood risk area as per SEPA's Flood maps.
- The soil within the site (Category 3.2 and 4.2) is designated as non-prime agricultural land as per the James Hutton Institute's Land Capability Classification for Agriculture maps.

2.1.12 Additional designations within the surrounding area are identified on **Figure 2.3** below.

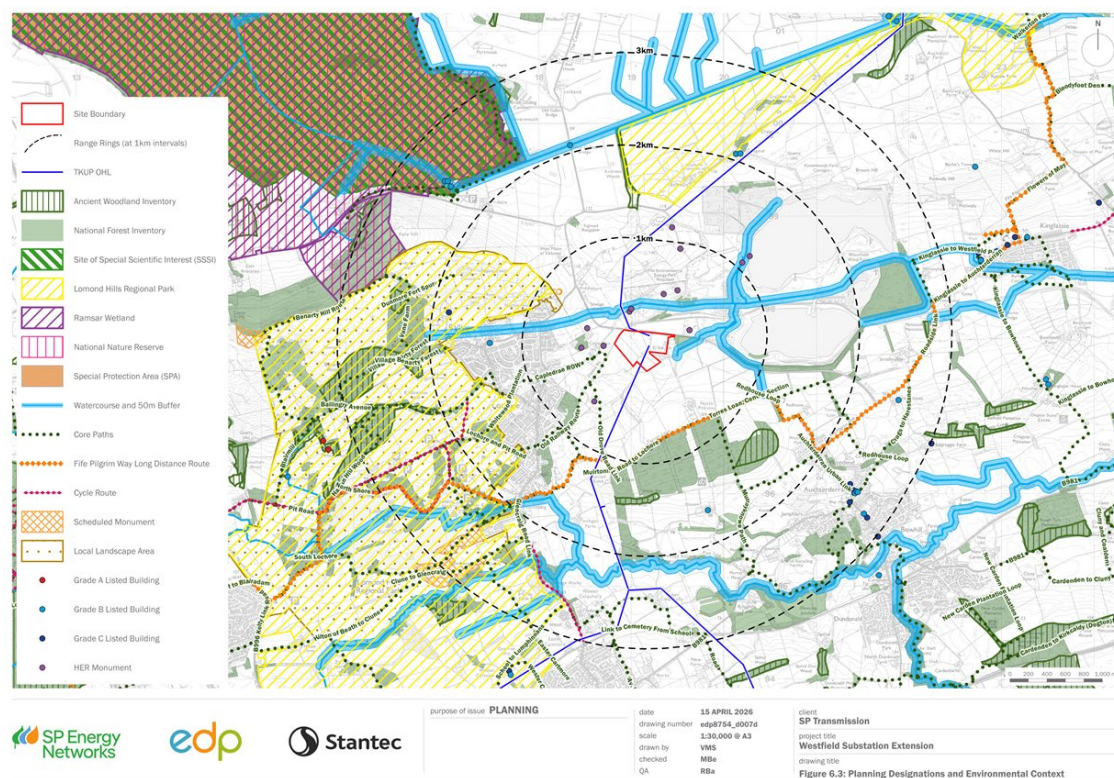


Figure 2.3: Relevant Surrounding Planning Designations and Environmental Context

03.

Description of the Proposed Development

3. Description of the Proposed Development

3.1 Overview

- 3.1.1 Planning Permission in Principle is sought for “the erection of a 400kV electricity substation, plant and infrastructure, landscaping, drainage, and associated development and works, and the decommissioning of the 275kV elements of the existing Westfield Substation”.
- 3.1.2 If the PPiP application is approved, the detailed design will be consented under the subsequent Approval of Matters Specified in Conditions (AMSC) application(s).
- 3.1.3 The Proposed Development comprises the 400kV extension to the existing 275/132kV Westfield substation and the decommissioning of the 275kV elements of the existing Westfield Substation. The proposed Westfield 400kV Substation Extension is located immediately west of the existing 275/132kV Westfield Substation.
- 3.1.4 Following the completion of the construction and electrification of the proposed extension to the Westfield substation, the existing 275kV component of the substation will be deconstructed and the land maintained for future high voltage infrastructure that may be required. This decommissioning work form part of the Proposed Development.
- 3.1.5 The proposed indicative site plan is shown at **Figure 3.1** below.

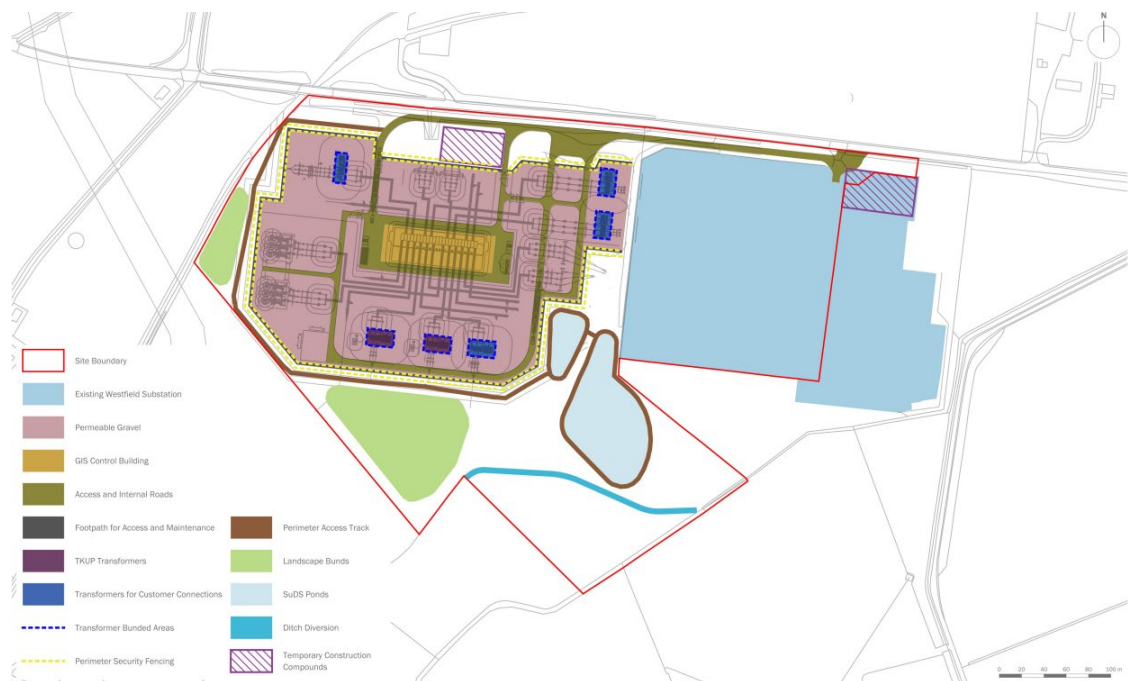


Figure 3.1: Proposed Indicative Site Plan

3.1.6 Maximum development parameters have been established for the purpose of the PPiP application. These include the following and are illustrated on the indicative site plan (EIAR figure 3.1) and EIAR **figure 3.5** (maximum heights) where relevant:

- Maximum building and infrastructure/component heights: GIS Building 17m, lighting columns 6m, Transformers 14m, Busbars, gantry structures and other ancillary infrastructure 14m;
- Maximum extent of development footprint of 60,000 square metres;
- Maximum height (90.5m aOD) of the finished floor level of the substation platform;
- Location of access onto B9097;
- Maximum height of primary perimeter security fence will be 3m founded on a continuous anti-dig concrete strip to prevent burrowing and undermining. A secondary maximum 2m high agricultural post-and-wire stock fence will be set 5m outside the security fence. Closed Circuit TV poles will be a maximum of 6.5m with lighting columns a maximum of 6m (4m standard height);
- Maximum extent of any earthworks or construction zones within the site boundary (16.7 ha);
- Maximum noise emissions from plant and equipment. The maximum sound power level of the transformers is 87dB(A);
- A construction compound will be located within SPEN land adjacent to the substation footprint. The indicative size of this compound is 30 m × 55 m. The compound will provide hardstanding for plant and welfare facilities, designed for 100 kN/m² bearing capacity, with granular layers and geotextile separation where required. Drainage will include temporary SuDS to manage runoff;
- Access tracks: The existing junction onto the B9097 will be altered to improve access to the site, including for transformer delivery vehicles. It will connect to an internal access road running parallel to the existing road and internal tracks around the platform. Roads will be 5 m wide, widened on bends, surfaced in asphalt externally and granular Type 1 internally. Drainage will use filter drains discharging via SuDS ponds; and
- Junction details: The junction will meet DMRB CD123 standards with 215 m visibility splays. Swept Path Analysis confirms suitability for 20-axle transformer vehicles (64.4 m long). Over-run areas and verge widening will accommodate abnormal loads. Assessments undertaken to date have been based on transformer delivery accessing and exiting the site from the east.

Access

3.1.7 The proposed vehicular access to the site will be retained at the existing substation access, although reconfigured to also provide access to the site. The existing substation access is in the form of a priority junction with the B9097.

3.1.8 The Proposed Development seeks to include proposed road markings and widening of the internal road to include hatched areas for over-run area for HGV and AIL vehicles (including for transformer deliveries). The current proposals are indicative, and further details are to be provided and developed at the detailed design stage.

- 3.1.9 Given the nature of the Proposed Development, pedestrian and cycle travel to the site will be negligible, however, internal footpaths are proposed for access and maintenance to the transformers.
- 3.1.10 Submitted drawings SC003-024-RPS-XX-SK-C-003 PO2 (Access Track and Visibility), SC003-024-RPS-XX-SK-C-004 PO2 (Access Track Transformer Deliveries), and RPS-XX-SK-C-005 PO3 (Access Track HGVs) demonstrate the proposed indicative road markings, vehicle tracking and visibility splay at the access.
- 3.1.11 A visibility splay of 2.4m x 215m has been shown at the site access, which is in accordance with the Design Manual for Roads and Bridges for a major road speed limit of 60mph, which the B9097 is subject to.
- 3.1.12 Although the construction routes are yet to be agreed, two scenarios have been proposed at this stage and include the following:
- Scenario 1: 100% of HGV movements route west to/from Junction 5 of the M90; and
 - Scenario 2: 50% of HGV movements route west to/from Junction 5 of the M90 and 50% of HGV movements route east along the B9097 and then south towards the A92.
- 3.1.13 The access arrangements are to be discussed with FC during the application determination stage. Please see the Transport Statement for further information.
- 3.1.14 The swept path drawings demonstrate that a HGV is able to enter the site without conflict from the west and east. The drawings also show that the AILs are able to enter and egress the site from the east without conflict.
- 3.1.15 With regard to AIL (transformer deliveries) movements, Drawing SC003-024-RPS-XX-SK-C-004 PO2 (Access Track Transformer Deliveries), provides the following annotation:
- “Assumed transformer deliveries will enter site from the east. Any deliveries approaching from the west are assumed to overshoot the junction, turn the tractors and then drive in from the east. Assumed transformer removals will leave site travelling to the east. Where onward travel is to the west, a similar approach to the deliveries will be adopted.”*

Substation Platform and Electrical Infrastructure

- 3.1.16 The substation electrical infrastructure will be located on the substation platform, a flat levelled area (delivered through cut and fill earthworks), comprised primarily of permeable gravel, at a height of approximately 89m aOD. The new substation platform will be approximately 8m west of the existing Westfield substation. There will be tarmacked access roads and vehicle parking areas (including provision for EV charging), and a perimeter maintenance access.
- 3.1.17 The Proposed Development will utilise Gas Insulated Switchgear (GIS) (with a non-SF₆ dielectric gas) to house different electrical devices to switch, separate, transform, measure and distribute electricity. There will be a GIS building to house the 400kV GIS Switchgear and associated protection and control equipment.
- 3.1.18 The building will be a steel portal frame design with exterior cladding. Within the GIS building during normal operation there will be minimal activity, with electrical switching taking place during

energisation, if faults occur and for maintenance. The GIS building will house staff welfare facilities and an office. The site will be unmanned, other than for typical maintenance, or if emergency works are necessary.

- 3.1.19 The Proposed Development includes the installation of a minimum of 2 and maximum of 6 x 400/kV Super Grid Transformers, which enable connections from the 400kV transmission network into the wider 132kV network, with the transformers allowing a change in voltage in the system from one level to another. Of these, one will be a 400/275kV transformer. Each transformer will be sat within an impermeable concrete bunded area to contain any oil spill from the equipment. The bund will be fitted with a suitable Class 1 oil water separator system, with any clean water to drain to soakaway, designed to meet the requirements of BS EN 858-1 (separator systems for light liquids)
- 3.1.20 There will also be a Mechanically Switched Capacitor with Damping Network (MSCDN), which is a highly developed form of mechanically switched capacitor which assists in managing and controlling system voltage levels across the network.
- 3.1.21 Other necessary electrical infrastructure will include earth switches, surge arresters, current and capacitive voltage transformers, and post insulators. In addition, there will be auxiliary systems and equipment, including for example distribution boards, a standby diesel generator and fuel tank (which will be integrally bunded), fuse boxes etc. There will be Gas Insulated Busbars (GIB) (which have the appearance of pipes), other plant structures, line gantries, and other cabling as necessary. The GIB will be a grey colour (likely to be RAL 7038 Agate Grey).

Landscape Strategy

- 3.1.22 The proposed Illustrative Landscape Strategy is shown at **Figure 3.2** below.

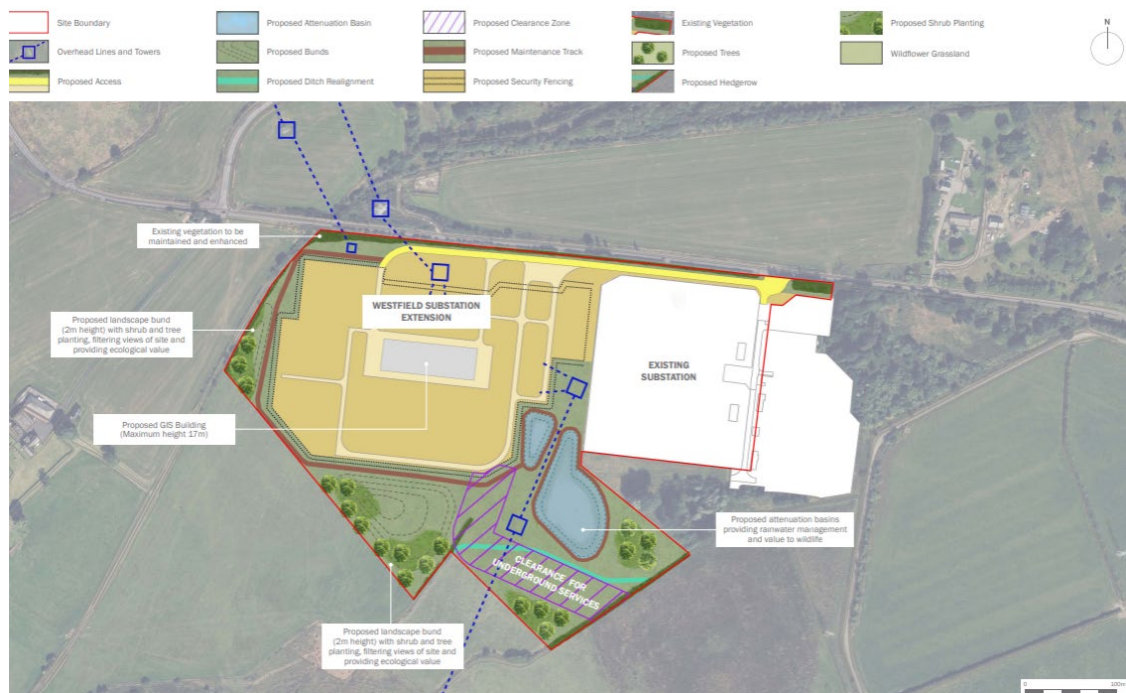


Figure 3.2: Illustrative Landscape Strategy

- 3.1.23 As is outlined within the Arboriculture Report, the proposals will require the complete removal of six tree groups totalling an area of approximately 4,686m² and two hedgerows (totalling approximately 338m in length). Some minor pruning works may be required to trees east and west of the existing access to the substation to facilitate access by larger vehicles. Please see the Arboricultural Impact Assessment for further information.
- 3.1.24 During construction, exclusion zones around retained trees by tree protection barriers will be used, in accordance with BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The tree protection barriers will be designed and installed to exclude construction activities and will ensure adequate protection for trees, woodlands and hedgerows as appropriate.
- 3.1.25 Landscape bunds, with a maximum height of 2m, are proposed to the south-west and south-east of the substation platform. In addition, low height tree and shrub planting and new hedgerow will assist with filtering views of the Proposed Development from the south and south-west.
- 3.1.26 Outside of the development substation platform there will be an area established as a wildflower grassland. Along the northern, western and south-eastern boundaries of the site existing hedgerow and trees will be retained where possible. Compensatory tree planting is proposed as shown on **Figure 3.2**. Other landscaping includes proposed hedgerow planting.
- 3.1.27 A fixed Landscape Strategy Plan will be submitted in support of an AMSC application (if the PPiP application is approved).

Drainage

- 3.1.28 There will be appropriate SuDS provision to accommodate surface water runoff from the substation platform. This will include both permanent and temporary drainage features.
- 3.1.29 A permanent SuDS feature, comprising two interlinked basins will be provided, located to the south-east of the substation platform, with access for maintenance. The basins will have an outfall to an existing ditch at the south-eastern extent of the basin.
- 3.1.30 It is also anticipated that a section of the existing perimeter ditch will need to be realigned. Where this is necessary, the channel section will be designed to accommodate compensatory flood storage. This is illustrated on Figure 3.2 above.
- 3.1.31 A detailed drainage strategy will be submitted in support via an AMSC application if the PPiP application is approved.

Lighting, CCTV and Fencing

- 3.1.32 The substation will be surrounded by a 3m high steel palisade perimeter security fence. The fence will have vehicular and pedestrian access gates at suitable locations. A 2m wide footpath will be installed around the perimeter. A second 3m high palisade or deer fence will be installed at a distance of 5m from the primary security fence.
- 3.1.33 There will also be approximately 20 CCTV columns along the perimeter security fence line and within the substation compound itself at a height of 6.5m above ground level.

- 3.1.34 Within the substation compound there will be some exterior lighting on columns (6m maximum height), which will only be lit when the site is manned. For the majority of the time the site is unmanned and therefore these will not be required.

3.2 Approximate Construction Programme

- 3.2.1 The Proposed Development will be constructed 'offline', in effect while the existing 275/132kV substation remains operational. This is in order to provide continuity of supply across the transmission network.
- 3.2.2 Subject to securing planning permission and other required consents and approvals being granted, the indicative construction programme for the Proposed Development is as follows:
- Construction Start: September 2027;
 - Installation of Main Plant and Equipment: October 2029;
 - Reinstatement of grassland and proposed landscaping measures: October 2030;
 - Electrification and Commissioning: October 2030.; and
 - Decommissioning of the existing 275kv electrical equipment Q4 2031.
- 3.2.3 Further detailed construction phasing and programme are subject to change as the design progresses and the necessary consents and land rights are secured.
- 3.2.4 Construction work is likely to be during daytime periods only. Working hours are currently anticipated proposed to be between approximately 07:00 to 19:00 and are proposed for seven days a week. 08:00 to 18:00 Monday to Friday, 08:00 to 13:00 on a Saturday and no scheduled works on a Sunday or Bank Holiday. Any out of hours working will be agreed in advance with Fife Council.

3.3 Operation and Management

- 3.3.1 The Proposed Development will operate 24 hours per day, 365 days per year and will predominantly be unmanned.
- 3.3.2 The Applicant is seeking planning permission for the Proposed Development on an enduring basis. It is anticipated that the substation plant and equipment has a design life of approximately 40 years, after which it will be replaced with new equipment designed and installed to the relevant engineering specification and environmental standards.
- 3.3.3 There will be maintenance visits to the site approximately 90 days per year and any planned maintenance work will be undertaken between the hours of 08:00 and 17:00. Other maintenance repairs and works will be required sporadically.

04.

Energy Policy and Legislative Framework

4. Energy Policy and Legislative Framework

- 4.1.1 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.
- 4.1.2 Planning Circular 3/2022 (Development Management Procedures) indicates some of the broad range of considerations which would be considered material in the determination of a planning application. Annexe A confirms some of these considerations to be Scottish Government and UK Government Policy.
- 4.1.3 Through these national policies relating to the climate emergency and renewable energy, there is substantial support in place for the Proposed Development in contributing to climate change mitigation and increased renewable energy production. Therefore, although not part of the formal Development Plan, these national climate and renewable policies (which are identified and briefly summarised below) form key material considerations and should be afforded due weight in the determination of this planning application.

4.2 UK Energy Legislation and Policy

Energy Act 2023

- 4.2.1 The Energy Act 2023 received Royal Assent in October 2023 and is the largest piece of energy legislation in the UK. The Act includes several provisions that are relevant to the Proposed Development.
- 4.2.2 The Energy Act 2023 is a landmark UK legislation designed to transition to a cleaner, more secure, and affordable homegrown energy system. It aims to unlock £100 billion in private investment, support 480,000 jobs by 2030, and meet net-zero commitments. Net Zero Strategy: Build Back Greener (updated 2022)
- 4.2.3 The Net Zero Strategy (Build Back Greener) was published on 19 October 2021 and last updated in April 2022. It sets out a series of policies and commitments designed to enable the UK to reach net zero by 2050 including:
- Fully decarbonise the power system by 2035;
 - Deliver four carbon capture, usage, and storage (CCUS) clusters by 2030, capturing 20–30 MtCO₂ per year across the economy;
 - targeting £40 billion of private investment (specifically through the UK Infrastructure Bank) and up to £90 billion by 2030 to unlock green growth; and
 - Adherence to legally binding five-year carbon budgets to track progress toward the 2050 goal.

Progress in Reducing Emissions - 2025 Report to Parliament

- 4.2.4 The Climate Change Committee's 2025 report to UK Parliament highlight major progress in decarbonising electricity via renewables and EVs, but stress urgent need for action in buildings (heat pumps), industry, and land use, recommending cheaper electricity, better policy for adaptation, and significant investment in grid infrastructure (like substations) to handle renewables and electrification, stating the Net Zero target is deliverable but requires consistent, enhanced government effort, with adaptation efforts currently too slow.

The Clean Power 2030 Action Plan (2024)

- 4.2.5 The Clean Power 2030 Action Plan (published December 2024) identifies electrical substations as a critical component of the urgent, "once-in-a-generation" upgrade required for the UK's energy infrastructure. To accelerate the expansion and upgrade of transmission and distribution networks, the plan outlines specific regulatory and planning reforms aimed at easing the deployment of these facilities. The government plans to engage with the Ministry of Housing, Communities and Local Government (MHCLG) to provide further flexibilities for the consenting of electrical substations in order to reduce delays in the planning process. An improved planning environment is designed to speed up the delivery of approximately twice as much new transmission network infrastructure by 2030 as was built in the previous decade.
- 4.2.6 Great Britain's electricity network must undergo unprecedented expansion, as the economy electrifies, to deliver decarbonisation, energy affordability and energy security, and support economic growth. To connect new generation and meet future demand, around twice as much new transmission network infrastructure will be needed in Great Britain by 2030 as has been delivered in the past decade.

British Energy Security Strategy (2022)

- 4.2.7 The UK's British Energy Security Strategy, launched in 2022 and updated through "Powering Up Britain", aims to boost energy independence, security, and affordability by rapidly scaling domestic, clean energy sources like wind, solar, nuclear, and hydrogen, while reducing reliance on volatile global markets and Russian fossil fuels. Key pillars include massive investment in renewables (offshore wind, solar), developing nuclear and hydrogen, improving energy efficiency, and streamlining approvals, all under the new Department for Energy Security and Net Zero to meet 2050 net-zero targets.
- 4.2.8 The Strategy states that accelerating our domestic supply of clean and affordable electricity also requires accelerating the connecting network infrastructure to support it.

National Energy System Operator - Pathway to 2030 (2022)

- 4.2.9 This is a plan for Great Britain to achieve a secure, affordable, and low-carbon electricity system by 2030, focusing on massive renewable energy expansion (wind/solar), grid modernization, demand flexibility, and significant grid connection reforms to unblock stalled projects. It outlines two main strategies, emphasizing increased flexibility, digital infrastructure, and a massive scale-up of clean power to reduce reliance on gas and meet net-zero goals, requiring urgent action and investment in storage and skills.

- 4.2.10 The plan identifies a critical need to significantly upgrade Great Britain's transmission infrastructure and supports the UK-wide 50GW and Scottish 11GW offshore wind targets by 2030, necessitating over £54 billion in network investment to connect renewable energy.

Overarching National Policy Statement for energy (EN-1)

- 4.2.11 This is a UK government document which came into force in January 2026 (revised) and provides the primary policy framework for examining and consenting nationally significant energy infrastructure projects.
- 4.2.12 It accelerates the UK's transition to a 95% clean electricity system by 2030, prioritizing urgent, large-scale, low-carbon infrastructure. It establishes a "presumption in favour of consent" for projects aligned with the Centralised Strategic Network Plan (CSNP), positioning energy infrastructure as a Critical National Priority (CNP) to meet net-zero 2050.
- 4.2.13 The Statement declares an "urgent need" for massive electricity transmission network upgrades to meet net-zero targets, classifying these reinforcements as "Critical National Priority" (CNP) infrastructure. The policy emphasizes that "demand for electricity is likely to increase significantly... and could more than double by 2050".

National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 4.2.14 The National Policy Statement for Renewable Energy Infrastructure (EN-3) is a UK government document that provides the primary basis for planning decisions (development consent) for nationally significant renewable energy projects in England and Wales. The 2025 revised version, which came into force on January 6, 2026, was updated to align with Net Zero targets and speed up infrastructure deployment.
- 4.2.15 The Statement states that Electricity generation from renewable sources is an essential element of the transition to Clean Power 2030 Mission, net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.

National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 4.2.16 The National Policy Statement for Electricity Networks Infrastructure (EN-5) is the primary planning guidance for deciding on "nationally significant" electricity grid projects in England and Wales. The revised version officially came into force on 6 January 2026. It emphasizes the urgent need for new network infrastructure to support 2030 Clean Power targets, directing decision-makers to balance environmental, social, and cost factors.
- 4.2.17 The Statement states that a "significant amount of new network infrastructure is required in the near term" to achieve net-zero targets and the 2030 clean power mission. It establishes that, because "without the development of the necessary networks... the Clean Power 2030 Mission cannot be achieved".

4.3 Scottish Government Policy

Climate Change (Scotland) Act 2009

- 4.3.1 The Climate Change (Scotland) Act 2009 received Royal Assent on 4 August 2009 and established a legal framework for climate action in Scotland.
- 4.3.2 The Climate Change (Scotland) Act 2009 (the 2009 Act) set ambitious and, at the time, world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. This target was subsequently amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (the 2019 Act) to set an even more ambitious target of net-zero emissions by 2045. The 2019 Act also set interim targets for 2020, 2030 and 2040. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 further amended the 2009 Act, removing the interim targets and replacing them with a system of targets based on carbon budgets which are to be set every five years, while still retaining the 2045 net zero emissions target.
- 4.3.3 Immediately preceding the release of the 2024 Act, the Climate Change Commission delivered a report to Scottish Parliament titled “Progress in reducing emissions in Scotland” (March 2024). The report set out that the Scottish Government was not going to meet its 2030 targets as set out in the Climate Change (Scotland) Act 2009 and demanded stronger action and reinforced the need for much more generating capacity.

Green Industrial Strategy (2024)

- 4.3.4 Scotland's Green Industrial Strategy (GIS) highlights grid modernization, including substations, as crucial for its net-zero goals, focusing on unlocking massive private investment (billions) by upgrading transmission networks, building new substations, and strengthening connections to support offshore wind, hydrogen, and other clean energy growth, ensuring a future-ready system for economic benefits and energy independence. The strategy aims to increase clean energy investment.
- 4.3.5 The document states that *“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.”* and *“timely grid connections and strengthened grid infrastructure will be key to securing renewables project delivery and investor and supply chain confidence in Scotland”*.

The Climate Emergency (2019)

- 4.3.6 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 Climate Change Committee) and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).
- 4.3.7 This declaration was followed by the passage of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.
- 4.3.8 The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 195 Parties at the UN Climate Change Conference (COP21) in Paris, France, on 12 December 2015. It

entered into force on 4 November 2016. Its overarching goal is to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels. However, in recent years, world leaders have stressed the need to limit global warming to 1.5°C by the end of this century.

Securing a Green Recovery on a Path to Net Zero: Climate Change Plan 2018–2032 - Update

- 4.3.9 The "*Securing a green recovery on a path to net zero: climate change plan 2018–2032 - update*" outlines Scotland's 2020 strategy to meet a 75% emission reduction by 2030 and net-zero by 2045.
- 4.3.10 It aligns COVID-19 recovery with climate goals, featuring over 100 policies across sectors like transport, energy, and buildings to ensure a just, green transition

The Scottish Energy Strategy: The Future of Energy in Scotland (2017)

- 4.3.11 The Scottish Energy Strategy ('SES') was published in December 2017 and sets out the Scottish Governments vision for the future energy system in Scotland up to 2050.
- 4.3.12 The SES states that the UK Government holds a number of key powers that will be vital to our net zero transition, including fiscal and pricing elements of emissions trading, decisions on the future of the gas grid, investment in electricity network infrastructure, regulation on energy networks, vehicle standards and regulation of renewable energy investment.
- 4.3.13 The strategy also highlights the importance of developing smart grid systems and local energy markets to enhance flexibility and resilience in the energy system.

Scotland's Energy Strategy Position Statement (2021)

- 4.3.14 The Position Statement was published in March 2021 and outlines the Scottish Government's vision for the energy system in Scotland
- 4.3.15 The Statement confirms the Scottish Government's commitment to achieving net-zero greenhouse gas emissions by 2045, with a 75% reduction by 2030. It outlines a green, fair recovery from COVID-19, focusing on accelerating renewable energy (especially offshore wind), decarbonising heat in buildings, establishing a hydrogen economy, and ensuring a just transition for the workforce.

A Vision for Scotland's Electricity and Gas Networks 2019-2030

- 4.3.16 The document outlines how Scotland's energy infrastructure must transform to meet ambitious Energy Strategy targets for 2030 and beyond.
- 4.3.17 The vision is built on three fundamental principles to ensure the energy transition is effective and fair:
 - Whole System View: Coordinating heat, transport, and electricity to ensure efficient decarbonisation;
 - Inclusive Transition: Protecting vulnerable consumers and ensuring the benefits of low-carbon energy are universal; and

- Smarter Local Models: Supporting innovative, community-led energy systems that reward local flexibility.

4.3.18 Electricity Network objectives include building a secure and resilient high-voltage network.

Draft Energy Strategy and Just Transition Plan (January 2023)

4.3.19 The Draft Energy and Strategy and Just Transition Plan was published in January 2023 and emphasizes the need for a secure, reliable, and affordable energy supply, which inherently includes the infrastructure necessary for energy transmission and distribution, like substations. The plan also highlights the importance of investment in energy infrastructure, including networks, to facilitate the integration of renewable energy sources and ensure a stable

4.3.20 The Government is yet to publish the final version of the Energy Strategy and Just Transition Plan.

Conclusion

4.3.21 The identified legislation and policies establish clear support for development that helps decarbonise the electricity network, including transmission infrastructure. The legal requirements (as set out in the Climate Change (Scotland) Act 2009) and associated policy requirements are material considerations in the determination of this application to which significant weight should be attached.

05.

Planning Policy Framework and Assessment

5. Planning Policy Framework and Assessment

5.1 Introduction

5.1.1 The policy framework material to the determination of the required planning applications are as follows:

- Relevant statutory provisions;
- The Development Plan; and
- Other material considerations, including local planning guidance and relevant national policies, advice and guidance.

5.2 Relevant Statutory Provisions

5.2.1 The planning legislation of relevance to the proposals are:

- The Town and Country Planning (Scotland) Act 1997 (The Principal Act);
- The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations) as amended;
- The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 as amended;
- Town and Country Planning (Development Planning) (Scotland) Regulations 2023;
- The Construction Design and Management Regulations 2015; and
- The Electricity Act 1989 (The Electricity Act).

5.3 Development Plan

5.3.1 The statutory Development Plan for Fife Council comprises:

- National Planning Framework 4 (NPF4) – adopted 13 February 2023; and
- Fife’s Local Development Plan - FIFEplan (adopted September 2017).

5.3.2 Section 24(3) of the Town and Country Planning (Scotland) Act 1997 provides 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.

5.3.3 Fife Council is currently preparing a new Local Development Plan (Fife’s Place Plan), which will replace FIFEplan. The Council are currently gathering evidence and undergoing consultations. Fife’s Place Plan is scheduled for adoption in 2028/29.

5.3.4 The Council also have a number of Supplementary Planning Documents. Those of relevance to the Proposed Development are as follows:

- Low Carbon Fife Supplementary Guidance (2019);

- Minerals Supplementary Guidance (2018);
- Making Fife's Places Supplementary Guidance (2018); and
- Trees and Development Guidance (adoption date unknown).

National Planning Framework 4

- 5.3.5 From 13 February 2023, Scotland's fourth National Planning Framework (NPF4) forms part of the statutory Development Plan. NPF4 must be read as a whole, and its 33 policies are to be used as a guide to decision making.
- 5.3.6 As is outlined under section 1.7, development involving the delivery of 'Strategic Renewable Electricity Generation and Transmission Infrastructure' (such as the Proposed Development) is classed as a 'National Development' in NPF4, if it is of a scale or type that would otherwise have been classified as 'major' by The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009, which is applicable to the Proposed Development.

FIFEplan

- 5.3.7 Fife Council adopted FIFEplan (Fife's Local Development Plan) on 21 September 2017. It sets out the policies and proposals for the development and use of land across Fife. The policies in the Plan and supplementary guidance will be used to determine planning applications and give guidance to communities and investors on where development can and cannot take place, what type of development is allowed, how it should be laid out and designed and how environmental and cultural assets will be protected.
- 5.3.8 The relevant Development Plan policies are identified and outlined in **Table 5.1** (NPF4) and **5.2** (FIFEplan) below, in addition to the Proposed Development's conformity with these.

Table 5.1: Relevant NPF4 Policies and Compliance

Policy	Relevant Policy Extracts	Proposed Development Conformity
Policy 1 (Tackling the Nature and Climate Crisis)	When considering all development proposals, significant weight will be given to the global climate and nature crises.	As is outlined in Section 1.2 of this report, expected increases in onshore and offshore wind generation to meet the UK and Scottish Governments net zero greenhouse gas emissions targets confirm the need to deliver significant additional transmission capacity through central and southern Scotland. Therefore, growing north to south power transfer requirement across each of the Scottish Power Transmission (SPT) network boundaries is required, driving the need for significant transmission reinforcement. Essential reinforcements in this area include the uprating to 400kV of onshore overhead line circuits from Kintore to Tealing on the east coast, known as the Tealing to Kincardine Upgrade Project (TKUP). This overhead line passes through Westfield. As a result, new 400/132kV transformers are required at the existing Westfield substation. In order to achieve this, an extension to the existing 275/132kV substation is required. The Proposed Development is therefore an essential part of the wider TKUP project, which is being undertaken to help achieve the UK and Scottish Governments net zero greenhouse gas emissions targets. Meeting these targets is crucial for mitigating climate change. The Proposed Development will therefore contribute to tackling the global climate crisis by introducing more flexibility into the grid to support the roll out of renewable energy within Scotland and transition to net zero carbon energy sources. In relation to the 'nature crisis', as is outlined in further detail in response to Policy 3 (Biodiversity) within this table, the Proposed Development will minimize adverse impacts on biodiversity, nature networks, and the natural environment, whilst also delivering an overall significant biodiversity enhancement. The Proposed Development therefore complies with NPF4 Policy 1, which requires to be given significant weight in favour of the grant of planning permission.
Policy 2 (Climate mitigation and adaptation)	Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible. Development proposals will be sited and designed to adapt to current and future risks from climate change.	In relation to Policy 2(a), as is outlined in response to Policy 1 above, the Proposed Development is an essential part of the wider TKUP project, which is being delivered 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). In relation to 2(b), the Proposed Development may be vulnerable extreme weather events including flooding. NPF4 requires that new development be assessed against a 1 in 200 year flood, with allowances for climate change. Furthermore, SPEN Substation Flood Resilience Policy (SUB-01-018 Issue 3) requires all grid and primary substations to be protected to a 1 in 1000 year flood risk return period, with an allowance for climate change. Compliance with these requirements are addressed with the Flood Risk Assessment submitted in support of the

Policy	Relevant Policy Extracts	Proposed Development Conformity
		application and summarised in response to NPF4 Policy 22 (Flood Risk and Water Management) in this table below. The Proposed Development therefore complies with NPF4 Policy 2.
Policy 3 (Biodiversity)	a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible. b) 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: i. The proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats; ii. Wherever feasible, nature-based solutions have been integrated and made best use of; iii. An assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements; iv. 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	As required by Policy 3(b) criteria i, the existing characteristics of the site and its local, regional and national ecological context is outlined within the Ecological Appraisal Report submitted in support of the planning application and EIAR Chapter 7. In relation to criteria (b)ii to iv, likely significant adverse effects, in the absence of mitigation, are restricted to the direct loss of woodland, hedgerow, trees, watercourse and associated bat foraging, commuting and roosting resources and impacts to fish populations during construction (Local Level – Minor Adverse effect/Significant). In order to mitigate for potential impacts during the construction phase, a range of industry standard measures describing key working methods and timings to avoid/minimise ecological effects during construction will be delivered through an Ecological Construction Method Statement, which would detail any protected species licences and species-specific method statements, and, where required, will specify where work will require supervision by a suitably qualified ecologist. Licences, if required, would be obtained in advance of construction, and mitigation measures would be further refined and agreed during the licencing process. Embedded mitigation has sought to retain the scrub habitat along the northern boundary, and the development footprint has been spatially separated from the retained watercourse to the south. Where the removal of habitats cannot be avoided, mitigation i.e. scrub, hedgerow and wildflower grassland will be planted within the site. Offsite habitat units will also be provided to ensure there is No Net Loss in biodiversity in line with NPF4 policy requirements. In parallel with this approach, SPT promote 10% biodiversity net gain to accord with the SPEN RIIO T3 business plan commitments. The establishment, maintenance and long-term management of the retained, enhanced and created habitats on-site will be delivered via a Biodiversity Enhancement Plan or other equivalent documentation. The landscaping at site will be additional to the provision of off-site biodiversity enhancement. Any trees planted at site will need careful consideration to ensure they do not undermine site security. In summary, with appropriate mitigation and design, the construction and operation of the Proposed Development is not anticipated to have any significant residual effects on Important Ecological Features. In relation to (b)v, given the nature of the Proposed Development, the site has limited recreation value. There is generally no existing pedestrian activity within or adjacent to the site and it will not be accessible to the general public once it is in operation.

Policy	Relevant Policy Extracts	Proposed Development Conformity
	within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and v. Local community benefits of the biodiversity and/or nature networks have been considered. d) 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 that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.	In relation to Policy 4 (d), the cumulative impacts from a biodiversity perspective are outlined within the Ecology and Biodiversity Chapter within the EIA Report submitted in support of the planning application. For the reasons outlined, the Proposed Development is in accordance with Policy 3 (Biodiversity).
Policy 4 (Natural Places)	a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. f) 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	In relation to Policy 4 (a), impacts on the natural environment are addressed in response to NPF4 Policies 3 (Biodiversity), 6 (Forestry, Woodland and Trees), 22 (Flood Risk and Water Management) and 23 (Health and Safety) within this table, in addition to within the EIA Report which accompanies the PPIP application. No significant adverse impacts have been identified. In relation to Policy 4 (f), as is outlined in detail within the Ecological Appraisal submitted in support of the planning application, the likelihood of presence, or confirmed presence, of protected, priority or other notable¹ wildlife species within the Site is summarised below: • Birds - a total of five bird species were recorded as breeding or probably breeding on-site. This includes one Priority Species and three other species of conservation concern • Bats - The desk study returned one recent record for soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) within the 1km search radius around the Site. A further seven historic records were identified within 1km, relating to Natterer's bat (<i>Myotis nattereri</i>) and pipistrelle species (<i>Pipistrellus</i> sp.). • Bat roosting - A total of 11 trees were identified as requiring further assessment or having Potential Roosting Features (PRF) for bats. Prior to removal, three emergence surveys will need to be undertaken on all trees proposed for removal. • Bat Activity Surveys – Survey observations included generally low levels of activity.

¹ Notable species are those which are not legally protected but are formally identified as being of conservation concern

Policy	Relevant Policy Extracts	Proposed Development Conformity
		• Otter - No records of otter were returned within 1km of the Site. • Water Vole - Although no evidence has been found during the surveys, water vole are mobile and given the suitable habitat on Site, future presence cannot be ruled out. • Badgers - Although no evidence has been found during the surveys, badgers are mobile and given the suitable habitat on Site, future presence cannot be ruled out. • Great Crested Newt - The desk study returned no records of great crested newt within 1km of the Site. The ecology team have provided input throughout the iterative design process so the development layout, although illustrative, reflects some important measures to avoid, mitigate or compensate for ecological impacts as well as other measures designed to provide long-term ecological enhancements. This embedded mitigation comprises the following: • Retention/buffering of valuable boundary habitats (including habitats known to support protected/notable species) – specifically the stream to the south, which will be buffered to protect commuting and foraging by birds, bats and otter; • A Construction Environmental Management Plan (CEMP), detailing a range of standard measures to avoid or mitigate environmental impacts during construction, including controls over working hours; avoiding the use of artificial lighting in sensitive areas; suppression of dust, vibration and noise; and prevention of surface water pollution; • An Ecological Construction Method Statement (ECMS) that details a range of standard measures to avoid or mitigate ecological impacts during construction, including identification of biodiversity protection zones with appropriate fencing and signage; sensitive timing and working methods to be adopted during both enabling and construction works to minimise harm to protected species; • Compliance with wildlife legislation including obtaining relevant mitigation licences for works affecting certain legally protected species, i.e. EPS licences in respect of roosting bats and sensitive working methodologies for the protection of nesting birds; • A surface water drainage strategy, including the incorporation of Sustainable Drainage System (SuDS) features, to maintain existing greenfield run-off rates and to improve water quality through intercepting pollutants; and • Landscape and Ecology Management Plan (LEMP) or equivalent document, setting out the long-term management, maintenance and monitoring of retained, created and enhanced habitats. Submission of the above identified documents can be secured by condition (if planning permission is granted).

Policy	Relevant Policy Extracts	Proposed Development Conformity
		The Proposed Development therefore complies with NPF4 Policy 4. Please see the Ecological Appraisal Report for further information.
Policy 5 (Soils)	a) Development proposals will only be supported if they are designed and constructed: - In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and - In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing. c) Development proposals on peatland, carbon rich soils and priority peatland habitat will only be supported for: - Essential infrastructure and there is a specific locational need and no other suitable site; - The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets; d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify: - the baseline depth, habitat condition, quality and stability of carbon rich soils; - the likely effects of the development on peatland, including on soil disturbance; and - 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	The Proposed Development has been designed to accord with policy (a) where possible. A Phase 1 Ground Investigation Study has been submitted in support of the application. This outlines that according to the National Scale Land Capability for Agriculture; the site is classified as Grade 3.2 and is therefore not prime agricultural land (Grades 1 – 3.1). In terms of the site location, locating the Proposed Development next to the existing substation has reduced wider land take and the requirement for additional infrastructure compared to if the substation was located in a more remote location from existing infrastructure. The proposals will be taken forward in a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing. If considered necessary, the submission of a Soil Management Plan can form a conditional requirement if the PPIP application is granted. As is outlined within the outline Construction Environmental Management Plan (CEMP), construction works will be programmed as far as is practicable to reduce soil handling and temporary soil storage. Further measures to protect soil can be outlined in a detailed CEMP, the submission of which can be a conditional requirement if PPIP is granted. In relation to Policy 5 (c), the “Scotland's Soils” map (which gives a value to indicate the likely presence of carbon-rich soils, deep peat and priority peatland habitat) identifies that an area within the southeastern edge of the site, outwith the proposed built development area is Class 4 soil, and the remainder of the application site area is identified as Class 0. The definitions of these soils which is provided on the “Scotland's Soils” map website are as follows: - Class 4 - Area unlikely to be associated with peatland habitats or wet and acidic type. Area unlikely to include carbon-rich soils - Class 0 (Mineral soil) - Peatland habitats are not typically found on such soils (Class 0) This therefore indicates that the Proposed Development is not on peatland, carbon rich soils or priority peatland habitat (as defined in NPF4 Annex F), and Policy 21 (c) or (d) therefore is not applicable. The Phase 2 Ground Investigation Report (the submission of which would be a conditional requirement if planning permission is granted) can however provide further information around the soil classification on site. For the reasons outlined, the Proposed Development is in accordance with NPF4 Policy 5.

Policy	Relevant Policy Extracts	Proposed Development Conformity
	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.	
Policy 6 (Forestry, woodland and trees)	a) Development proposals that enhance, expand and improve woodland and tree cover will be supported. b) 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, hedgerows 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; and iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry. 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.	There are no veteran trees or ancient woodland within the site. As is outlined within the Arboricultural Report submitted in support of the application, the proposals will require the complete removal of six tree groups totalling an area of approximately 4,686 m². This includes groups G6 and G8, which are considered to meet the NPF4 definition of woodland. The combined area of these groups is 0.15 ha (1,500 m²). The remaining 3,186 m² area of trees recommended for removal does not meet the NPF4 definition of woodland. The removal of two hedgerows (H1 and H2) totalling approximately 338m in length is also proposed. Within hedgerow H2, there are eighteen mature field boundary trees that require removal. Of the six tree groups to be removed, one was assessed as being of high retention value, category A and five were assessed as being of moderate retention value, category B. Tree removal within groups includes the removal of 1062m³ of high value, category A and 3624m³ of moderate value, category B. One hedgerow was assessed as being of high retention value, category A, and one was assessed as being of moderate retention value, category B. The hedgerow removal proposed includes 168m of hedgerow of high value and 170m of hedgerow of moderate value. Of the eighteen mature field boundary trees to be removed, two were assessed as being of high retention value, category A; two were assessed as being of moderate retention value, category B; eleven were assessed as being of low retention value, category C, and three were assessed as being unsuitable for retention, category U. The majority of tree features identified for removal were of moderate quality (category B), It states within the Arboricultural Report that it is not anticipated that their loss will have a significant adverse impact on the amenity or landscape of those areas. As is shown on the illustrative landscape strategy, low height tree and shrub planting and new hedgerow is proposed. Further compensatory planting to account for the removal of trees and hedgerows will be carried out at an appropriate offsite location to accord with NPF4 Policy 3 (Biodiversity). This could be controlled by way of an appropriately worded condition.

Policy	Relevant Policy Extracts	Proposed Development Conformity
		It is proposed that the submission of a detailed landscape plan will form a conditional requirement attached to the PPiP consent. The Proposed Development is therefore in accordance with NPF4 Policy 6.
Policy 7 (Historic assets and places)	a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.	As is outlined within the Archaeology and Heritage Assessment submitted in support of the application, the site does not contain any world heritage sites, scheduled monuments, registered parks and gardens, registered battlefields, listed buildings or conservation areas and so, therefore, there would be no direct impacts in that regard as a result of the site's development. The Archaeology and Heritage Assessment concludes that the Proposed Development of the site would not give rise to any loss of significance from any of the designated historic assets which are located within its wider surroundings. Based on the available evidence, this assessment has identified that the site has low potential for the survival of prehistoric or Roman remains. While there is moderate potential for medieval or post-medieval deposits to survive, these, if present, are most likely to be associated with agricultural exploitation of the site. Therefore, there is no reason to believe or expect that the site will contain archaeology or any form of historic asset of such significance that it would require preservation in situ and prejudice its delivery for the form of development proposed. On the basis that the site is of low archaeological potential, a strategy to mitigate the impact of development on any physical deposits that may exist on site, is not considered necessary in this instance. The Proposed Development is therefore in accordance with NPF4 Policy 7.
Policy 11 (Energy)	a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include: iii. enabling works, such as grid transmission and distribution infrastructure; 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.	The Proposed Development is in accordance with Policy 11 (a) given that it involves "enabling works, such as grid transmission and distribution infrastructure". With regard to noise impact, the Noise Assessment Report indicates that, in most cases, the predicted rating sound levels at identified receptors are below the measured background sound levels. This corresponds to a low impact in accordance with BS 4142:2014+A1:2019, and equates to a magnitude of impact of 'no change' based on national planning policy guidance. However, during the night-time period, the predicted rating level may exceed the background sound level by up to 3 dB at the receptor closest to the Proposed Development. This would result in a 'minor' magnitude of impact in accordance with national planning policy guidance. An assessment of low frequency sound has also been provided and indicates that noise complaints from low frequency sound are not likely to occur.

Policy	Relevant Policy Extracts	Proposed Development Conformity
	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: - impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker; - 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; - public access, including impact on long distance walking and cycling routes and scenic routes; - impacts on aviation and defence interests including seismological recording; - impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised; - impacts on road traffic and on adjacent trunk roads, including during construction; - impacts on historic environment; - effects on hydrology, the water environment and flood risk; - biodiversity including impacts on birds; - impacts on trees, woods and forests;	The impacts associated with the operation of the Proposed Development are presented within the Noise Impact Assessment (EIAR Technical Appendix 10.2) EIAR noise chapter. This concludes that, in most cases, the predicted rating sound levels at identified receptors are below the measured background sound levels. This corresponds to a low impact in accordance with BS 4142:2014+A1:2019, and equates to a magnitude of impact of 'no change' based on national planning policy guidance. However, during the night-time period, the predicted rating level may exceed the background sound level by up to 3 dB at the receptor closest to the Proposed Development. This would result in a 'minor' magnitude of impact in accordance with national planning policy guidance. The report considers the contextual factors. EIAR Chapter 5 (Noise) concludes that noise impacts from construction traffic are likely to be Short Term, Negligible on all roads, which is Not Significant and the residual noise effects from on-site operations are likely to be Long Term, Negligible to Minor at all noise sensitive receptors, which is Not Significant. An assessment of low frequency sound has also been provided and indicates that noise complaints from low frequency sound are not likely to occur. Regarding air quality, the Air Quality Impact Assessment reports that no Air Quality Management Areas (AQMAs) have been declared within Fife and concludes that there are not predicted to be any significant air quality effects as a result of the Proposed Development, which is considered to be in accordance with the requirements of NPF4 and the Fife Air Quality SPD. In response to criteria ii, the LVIA (EIAR Technical Appendix 6) outlines that the nature of the proposals and topography/juxtaposition of the Site and the surrounding landscape provides a notable level of enclosure. This provides a notable precedent of the kind of development proposed, which limits its zone of influence greatly and as such significant residual effects are contained within close proximity to the site. As outlined within Chapter 6 of the EIAR, the following receptors are likely to experience significant residual effects during construction: - The site character and its immediate surroundings (parts of LCT 186); - Users of small sections of The Fife Pilgrim Way West (including Core Paths R410, R519, R520, R817) but not the route overall; - Users of sections of Core Paths R580 and R581, but not the routes overall; - Users of sections of Core Path R828 and R583 (PVPs EDP 11 and 12) but not on the routes overall; - Users of sections of the B9097 as the route passes the site, but not the road overall; and - Residential Groups A to C. During operation the likely residual (Year 1) significant effects would be on the following landscape and visual receptors:

Policy	Relevant Policy Extracts	Proposed Development Conformity
	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	• The site character and its immediate surroundings (parts of LCT 186); • Users of short sections of The Fife Pilgrim Way West (including Core Paths R410, R519, R520, R817) but not the route overall; • Users of sections of Core Paths R580 and R581, but not the routes overall; • Users of sections of Core Path R583 (PVPs EDP 11) but not on the route overall; • Users of sections of the B9097 as the route passes the site, but not the road overall; and • Residential Groups B to C. During operation the likely residual (Year 15) significant effects would be on the following landscape and visual receptors: • The site character and its immediate surroundings (parts of LCT 186); • Users of sections of Core Paths R580 and R581, but not the routes overall; and • Residential Group C. Following the identification of a number of residual significant effects, the potential for further mitigation has been carefully considered. At this stage of the design and assessment process, all feasible and practicable mitigation measures have already been incorporated into the project layout and landscape strategy. These embedded measures include the optimisation of infrastructure positioning, the refinement of platform levels, and the inclusion of structural planting aimed at reducing visual prominence and integrating the substation into its surroundings. An appraisal of possible additional mitigation has been undertaken; however, no further measures have been identified that would materially reduce the level of residual effects without compromising the safe and functional operation of the substation or conflicting with other environmental constraints. Options such as further earthworks, screening structures, or additional planting were evaluated but were found either to have negligible benefit, to introduce new adverse effects, or to be technically unviable within the site context. Notwithstanding this, opportunities for long-term enhancement will continue to be explored as the detailed design progresses. This includes refinement of planting specifications and careful selection of native species. While these measures will contribute positively to the wider landscape, they are not expected to alter the significance of the assessed effects and are therefore presented as enhancement rather than additional mitigation. On this basis, a dedicated section on additional mitigation has been included in the LVIA, confirming that although further practicable mitigation has been considered, none is deemed feasible or effective in reducing the identified significant residual effects beyond those already embedded in the design.

Policy	Relevant Policy Extracts	Proposed Development Conformity
		Regarding public access (criteria iii), the site has limited recreation value. Impacts on walking routes from an LVIA perspective are considered as part of the LVIA. There is generally no existing pedestrian activity within or adjacent to the site and it will not be accessible to the general public once it is in operation. The Proposed Development will therefore result in no impact in relation to criteria iii. In relation to criteria iv and v, there will be no impact on aviation and defence interests, or telecommunications and broadcasting installations. In relation to impact on traffic and on adjacent trunk roads (criteria vi), including during construction, a Transport Statement has been submitted in support of the application. This concludes that: • There are no inherent road safety issues with the existing road layout in the vicinity of the site. • Visibility splays in accordance with the Design Manual for Roads and Bridges are achievable with removal of vegetation proposed as required • swept path analysis demonstrates that the existing access to be widened is suitable for heavy goods vehicles and abnormal indivisible load vehicle access. • The construction phase peak period proposes to generate 78 two-way HGV trips per day. The traffic impact associated with the Proposed Development will therefore be low and no junction modelling is required. • A traffic percentage impact assessment demonstrates that there will be a low increase of HGVs on the local road network during the peak construction period. • It is noted that a Construction Management Plan should be provided post planning to include further details of the construction impact. • In accordance with NPF4, it has been demonstrated that the Proposed Development will be not produce any material traffic impact on the local road network. With regard to criteria vii, as outlined in response to NPF4 Policy 7 (historic assets and places) above, there will be no impact on the historic environment. In relation to criteria viii, the Proposed Development is acceptable from this perspective, as outlined in this table in response to NPF4 Policy 22 (flood risk and water management) below. With regard to criteria ix, the Proposed Development is acceptable in this respect, as demonstrated in response to NPF4 policies 3 (Biodiversity) and 4 (Natural Places). Compliance with criteria x has been demonstrated in response to NPF4 Policy 6 (Forestry, Woodland and Trees) within this table. In relation to criteria xi and xii, the applicant is seeking planning permission for the Proposed Development in perpetuity. Therefore, no separate assessment of decommissioning of the Proposed Development is required, given that a permanent facility is proposed.

Policy	Relevant Policy Extracts	Proposed Development Conformity
		In relation to criteria xiii, cumulative impacts associated with the Proposed Development in respect of the following scoped in environmental disciplines are addressed within the EIAR Chapter 12, and the cumulative sites are identified on EIAR figure 12.1: • Landscape and visual amenity; • Ecology and Biodiversity; • Traffic and Transport (construction phase); • Air Quality (construction phase); • Major Accidents and Disasters; and • Noise (construction phase). EIAR Chapter 12 considers the potential for cumulative effects arising from the interaction between the Proposed Development and relevant elements of the TKUP and EGL4 projects, together with the interaction between other committed developments within the cumulative study area. The cumulative assessment has been informed by a proportionate 'short list' of developments, identified having regard to the geographical zone of influence for each environmental topic, the spatial relationship and extent of the developments, anticipated construction and operational programmes, and relevant topic-specific guidance on cumulative assessment. Where appropriate the assessment first considers the Proposed Development in combination with the relevant elements of the TKUP and EGL4 projects, recognising that a number of these are being progressed through separate consent applications as part of a co-ordinated programme of works. It also considers the cumulative effects of the Proposed Development in combination with other committed developments. The assessment concludes that, whilst some environmental receptors may experience the combined influence of multiple developments, these interactions do not result in additional or materially greater significant effects beyond those identified for the individual project elements, and no additional significant cumulative effects are anticipated. Further to the EIA report, there are not considered to be any further environmental topics which require assessment from a cumulative impact perspective. Individual effects from each project will be controlled by measures secured via conditions where necessary, such that the cumulative effects are unlikely to be greater than that experienced at a project level. There is therefore considered to be capacity within the landscape for this development without generating adverse cumulative effects. For the reasons outlined, the Proposed Development is in accordance with NPF4 Policy 11.

Policy	Relevant Policy Extracts	Proposed Development Conformity
Policy 12 (Zero Waste)	a) Development proposals will seek to reduce, reuse, or recycle materials in line with the waste hierarchy. b) Development proposals will be supported where they: i. Reuse existing buildings and infrastructure; ii. Minimise demolition and salvage materials for reuse; iii. Minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life; iv. Use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials; and v. Use materials that are suitable for reuse with minimal reprocessing. c) Development proposals that are likely to generate waste when operational, including residential, commercial, and industrial properties, will set out how much waste the proposal is expected to generate and how it will be managed.	As required by Policy 12(a), all waste management practices during construction will comply with appropriate regulations in addition to the Zero Waste Plan for Scotland. Any unsuitable or contaminated materials encountered during the construction process would be extracted and subject to appropriate disposal in accordance with all regulatory requirements, including through obtaining appropriate SEPA licences, if required. As is outlined within the SP Distribution Annual Environment Report (2023/24), as a sustainable networks business, SPEN are committed to incorporating circular economy principles into their policies, procedures and project delivery. This includes challenging business targets to reuse or recycle 100% of waste by 2030, excluding compliance waste. The Proposed Development will comply with the requirements of Policy 12(b) where relevant. The contractor will seek to minimise waste arising from the construction works and apply the waste hierarchy, with materials reused or recycled where reasonably practicable. Where suitable and permitted by the project specifications, consideration will be given to the use of recycled materials and materials with reduced embodied emissions. SPEN's general design specifications have recently been updated to permit the use of recycled materials in certain applications, which provides further opportunity for their use where technically appropriate. It should, however, be recognised that the nature of the substation works and associated technical specifications may limit the extent to which recycled, natural or reusable materials can be incorporated. Material selection will ultimately need to satisfy the relevant SPEN specifications, design requirements, and required performance criteria. The Proposed Development, as a facilitator of renewable energy, would reduce pressure on certain virgin resources, primarily by eliminating the need to continuously extract and burn finite fossil fuels (coal, oil, and natural gas) for electricity generation. It is expected that a conditional requirement would be attached to the planning permission (if granted) which requires the submission of a Construction Environmental Management Plan (CEMP) to include details of construction waste management measures. In relation to Policy 12(c), once the Proposed Development is in operation, there will be no waste generation associated with the operation of the site. On average, there will only be one trip to the site per month for check-up and maintenance purposes, and therefore any waste generated by these people will be taken off-site for disposal.

Policy	Relevant Policy Extracts	Proposed Development Conformity
Policy 13 (Sustainable transport)	b) Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they: v. Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation; vi. Will be accessible by public transport, ideally supporting the use of existing services; vii. Integrate transport modes; viii. Provide low or zero-emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards; ix. Supply safe, secure and convenient cycle parking to meet the needs of users and which is more conveniently located than car parking; x. Are designed to incorporate safety measures including safe crossings for walking and wheeling and reducing the number and speed of vehicles; xi. Have taken into account, at the earliest stage of design, the transport needs of diverse groups including users with protected characteristics to ensure the safety, ease and needs of all users; and xii. Adequately mitigate any impact on local public access routes. c) Where a development proposal will generate a significant increase in the number of person trips, a transport assessment will be required to be undertaken in accordance with the relevant guidance	Given the nature of the Proposed Development, the sustainable travel and investment hierarchies outlined under Policy 13 (d) are not considered to be relevant given that the Proposed Development will not be accessible to the public, and access to the site is limited to authorised persons only. There will likely only be an average of one trip to the site per month for check-up and maintenance purposes. Furthermore, there is generally no pedestrian activity adjacent to the site and the site has limited recreation value. There is no public access or Core Paths that pass through the site. In relation to policy 13 (c), there will not be a significant increase in the number of person trips. As such, a Transport Assessment has not been submitted, although a Transport Statement has been. The proposed parking provision will be confirmed as part of the AMSC application submission(s) if the PPiP application is granted. Overall, the Proposed Development complies with NPF4 Policy 13.

Policy	Relevant Policy Extracts	Proposed Development Conformity
Policy 14 (Design, Quality and Place)	a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. b) Development proposals will be supported where they are consistent with the six qualities of successful places (Healthy, Pleasant, Connected, Distinctive, Sustainable and Adaptable) c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.	The proposed substation design (which will be detailed as part of the AMSC submission(s)) prioritises both functionality and practicality to ensure a reliable and efficient power supply. This involves carefully arranging equipment, considering spatial separation, and incorporating safety and maintenance needs. Maximum parameters have been submitted with the application such that a 'worst case scenario' can be assessed. The site is adjoined by an existing substation. As such, the proposed use is compatible with the scale and nature of the existing area. As is outlined within the LVIA, the landscape and visual sensitivities of the site and its context have influenced the current masterplan through an iterative design process, insofar as this is possible with a highly restricted electrical layout which needs to link with existing OHLS and towers. Thus, the Proposed Development incorporates a degree of integral (or embedded) mitigation designed to avoid or reduce potential landscape and visual effects where this is possible and practical. These measures are illustrated on the Illustrative Landscape Strategy and can be summarised as follows: • Two landscape bunds approximately 2m high are proposed to the west and south of the substation. These will be planted to provide filtering of views. • Any existing retained scrub and grassland in the south-west corner of the site will be protected and enhanced to improve habitat condition and longevity and to help reduce physical impacts upon the landscape; • The proposed GIS building will be coloured Moorland Green (BS12B21) to help it integrate into its landscape setting; • New habitats will be introduced along the peripheries of the site – via hedgerow planting – and will be in keeping with the type of habitat found in the immediate context; and • The proposed landscape planting will follow the relevant technical guidance on planting under and around overhead powerlines. With regard to the six qualities of successful places (Healthy, Pleasant, Connected, Distinctive, Sustainable and Adaptable), the Proposed Development is compliant with these in so far as considered relevant. In relation to policy 14 (c), the Proposed Development will not be detrimental to the amenity of the surrounding area, as outlined within this table in response to Policies 11 (Energy) and 23 (Health and Safety).

Policy	Relevant Policy Extracts	Proposed Development Conformity
Policy 22 (Flood risk and water management)	a) Development proposals at risk of flooding or in a flood risk area will only be supported if they are for: i. essential infrastructure where the location is required for operational reasons c) Development proposals will: i. Not increase the risk of surface water flooding to others, or itself be at risk. ii. Manage all rain and surface water through sustainable urban drainage systems (SuDS), which should form part of and integrate with proposed and existing blue green infrastructure. All proposals should presume no surface water connection to the combined sewer; and iii. Seek to minimise the area of impermeable surface.	The Proposed Development comprises essential infrastructure as defined with Annex F of NPF4 (“all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations”). As is concluded within the Flood Risk Assessment submitted in support of the planning application, 2D hydraulic model of the development area was constructed to quantify the fluvial flood risk to the proposed site. Results indicate that peak water levels at the site are 85.08 metres above ordnance datum (mAOD) during the 1 in 200 year + CC event, and 85.13 mAOD during the 1 in 1000 year + CC event. The proposed substation platform is located entirely outwith the area at risk of flooding in a 1 in 200 year + CC event. A SuDS (Sustainable Drainage System) basin is proposed to be located immediately south-east of the platform within the current area at risk of flooding. To accommodate this SuDS feature, it is proposed that Unnamed Watercourse 1 will be realigned around the eastern and southern perimeter of the basin, before reconnecting to the existing channel downstream of the SuDS basin. A detailed drainage strategy will be submitted in support of the AMSC application(s), if planning permission is granted. The SuDS basin and watercourse realignment will be designed to ensure that there is no loss of floodplain capacity and no increase in flood risk for others. To accord with SPEN's Substation Flood Resilience Policy platform levels and / or vulnerable plant items and equipment should be located a minimum of 600 mm above the 1 in 1000 year + CC flood level. The proposed finished platform level is 88.60 mAOD, while peak water level within the vicinity of the site is 85.08 mAOD. Therefore, the proposed finished platform level is sufficient to provide the required freeboard. Flood risk from other sources, including coastal flooding, pluvial, groundwater, infrastructure failure and sewer flooding is considered to be low, and with appropriate mitigation of the fluvial flood risk, the Proposed Development is considered to comply with NPF4 Policy 22.
Policy 23 (Health and Safety)	b) Development proposals which are likely to have a significant adverse effect on health will not be supported. A Health Impact Assessment may be required. d) Development proposals which are likely to have significant adverse effects on air quality will not be supported. Development proposals will consider opportunities to improve air quality and reduce exposure to poor air quality. An air quality assessment may be required where the nature of the proposal or the air	In relation to policy 23(b), the Proposed Development is not likely to have a significant adverse impact on health, as concluded by the EIA Scoping Opinion (reference 24/01927/SCO), given that ‘risks to human health’ was scoped out. In relation to Policy 23 (d), an air quality assessment has been submitted with this application. This confirms that no Air Quality Management Areas (AQMAs) have been declared within Fife and concludes that there are not predicted to be any significant air quality effects as a result of the Proposed Development. Therefore, the Proposed Development is considered to be in accordance with the requirements of NPF4 and the Fife Air Quality SPD.

Policy	Relevant Policy Extracts	Proposed Development Conformity
	quality in the location suggest significant effects are likely. e) Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely. g) Development proposals within the vicinity of a major accident hazard site or major accident hazard pipeline (because of the presence of toxic, highly reactive, explosive or inflammable substances) will consider the associated risks and potential impacts of the proposal and the major accident hazard site/pipeline of being located in proximity to one another.	In relation to Policy 23 (e), a Noise Impact Assessment has been submitted with this application. As is outlined in response to NPF4 Policy 11(e) i, the noise impacts associated with the Proposed Development will not be significant. In relation to Policy 23(g), two hazard pipe centre lines (Scotland Gas Network and Shell UK Exploration and Production) are located to the west of the site, and the site is located within the hazard pipe consultation zones in relation to these. The Proposed Development has been sited to avoid these pipelines, and they won't be interfered with during development. As such, the Proposed Development will have no impact on these hazard pipes. SPEN have consulted the hazard pipe operators in relation to the Proposed Development, and they are therefore aware and comfortable with the proposals in this respect. EIA Report Chapter 11 (Major Accidents and Disasters [MA&D]) concludes that there are no significant MA&D effects for interactions with Major Accident Hazard Pipelines during construction and operation with embedded mitigation in place. For the reasons outlined, the Proposed Development is in accordance with NPF4 Policy 23.
Policy 25 (Community wealth building)	a) Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.	As is outlined in response to NPF4 Policy 11(c), the Proposed Development should result in socio economic benefits. The Proposed Development therefore accords with NPF4 Policy 25.
Policy 29 (Rural Development)	a) Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including: v. essential infrastructure; b) Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also	In relation to Policy 29(a), the Proposed Development should be supported as it constitutes "essential infrastructure", as defined with Annex F of NPF4 ("all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations"). In relation to Policy 29(b), as previously outlined in response to NPF4 Policy 14 (Design, quality and place), the proposed substation design (which will be detailed as part of a forthcoming AMSC application) prioritises both functionality and practicality to ensure a reliable and efficient power supply.

Policy	Relevant Policy Extracts	Proposed Development Conformity
	consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.	The site is adjoined by an existing substation and as such, the proposed use is compatible with the nature of the existing area. As is outlined within the LVIA, the landscape and visual sensitivities of the site and its context have influenced the current masterplan through an iterative design process, insofar as this is possible with a highly restricted electrical layout which needs to link with existing OHLS and towers. The transport needs of the development have been considered and are outlined within the Transport Statement. For the reasons outlined, the Proposed Development accords with NPF4 Policy 29.
Policy 33 (Minerals)	c) Development proposals that would sterilise mineral deposits of economic value will only be supported where: i. there is an overriding need for the development and prior extraction of the mineral cannot reasonably be undertaken; or ii. extraction of the mineral is impracticable or unlikely to be environmentally acceptable.	The entire site is a designated mineral search area on the FIFEplan Map, as identified on figure 2.2. As is outlined within the Phase 1 Ground Investigation Report submitted in support of the application, a desk-based geological review indicates that the site is underlain by glacial till deposits over sedimentary bedrock of the upper limestone formation, with limited localised peat recorded toward the southern extent. As set out in NPF4 Annex B, National Development 3 (Strategic Renewable Electricity Generation and Transmission Infrastructure), and as supported by NPF4 Policy 11 (Energy), there is an overriding need for electricity transmission infrastructure with these types of development considered to be of national importance. The UK and Scottish Governments have set legally binding targets to reach net zero in greenhouse gas emissions and end their contributions to climate change by 2050 and 2045 in the Climate change Act 2008 and Climate Change (Scotland) Act 2009 respectively. Decarbonisation of the energy sector is a central pillar of both governments' net zero strategies meaning the way in which energy is generated, transported and used is undergoing transformational change. As such, as required by Policy 33 (c) i, there is an overriding need for the Proposed Development. Furthermore, prior extraction of the mineral cannot reasonably be undertaken. This is due to the presence of existing electrical infrastructure on the site, and timing related pressures - electrification and commissioning of the site is scheduled for October 2030, and there is no window within the construction programme for mineral extraction works. As such, the Proposed Development is in accordance with Policy 33 (c).

Table 5.2: Relevant FIFEplan Policies and Compliance

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
Policy 1 (Development Principals)	Part A of Policy 1 (Development Principles) states that the principle of development will be supported if it is either: - within a defined settlement boundary and compliant with the policies for the location; or - in a location where the proposed use is supported by the Local Development Plan. Part B of Policy 1 states that development proposals must address their development impact by complying with the following relevant criteria and supporting policies, where relevant (relevant policy points identified only): - Mitigate against the loss in infrastructure capacity caused by the development by providing additional capacity or otherwise improving existing infrastructure; - Avoid the loss of valuable cultural, tourism, and community resources; - In the case of proposals in the countryside or green belt, be a use appropriate for these locations; and - Safeguard the character and qualities of the landscape (see Policy 13 Natural Environment and Access, and Policy 15 Minerals); - Avoid flooding and impacts on the water environment (see Policy 12 Flooding and the Water Environment); - Safeguard or avoid the loss of natural resources, including effects on internationally designated nature conservation sites - Safeguard the characteristics of the historic environment, including archaeology (see Policy 14 Built and Historic Environment);	The application site is located outwith any designated settlement boundary and is therefore located within the countryside. In relation to part A (b), although the proposed use is not supported within the FIFEplan specifically, it is supported within NPF4, which also forms part of the Development Plan. In relation to the part B policy requirements, the numbered policy requirements of relevance are addressed in turn below: The Proposed Development will improve energy infrastructure, as outlined in response to NPF4 Policy 1 (Tackling the Climate and Nature Crises) The Proposed Development will not result in the loss of valuable cultural, tourism and community resources, given the existing and proposed nature and location of the Proposed Development; The site is located in the countryside. As is outlined in response to FIFEplan policy 1 (part A) above, the Proposed Development in this location is considered to be acceptable. This is addressed in table 1 in response to NPF4 Policy 11 (Energy) The Proposed Development will avoid flooding and impacts on the water environment, as outlined in response to NPF4 Policy 22 (Flood Risk and Water Management). As is outlined in response to NPF4 Policy 12, the proposed development, as a facilitator of renewable energy, would reduce pressure on certain virgin resources, primarily by eliminating the need to continuously extract and burn finite fossil fuels (coal, oil, and natural gas) for electricity generation. The CEMP can provide further information in relation to how the proposed development will safeguard or avoid the loss of natural resources. The proposed development and will have no effects on internationally designated nature conservation sites; As is outlined in response to NPF4 Policy 7 (Historic Assets and Places), the Proposed Development will safeguard the characteristics of the historic environment, including archaeology In relation to the part C policy requirements, the numbered policy requirements of relevance are addressed in turn below: The Proposed Development will provide the required on-site infrastructure and facilities, including transport measures to minimise and manage future levels of traffic, as demonstrated within the Transport Statement submitted in support of the application. The Proposed Development will implement the waste hierarchy as defined in the Zero Waste Plan for Scotland, as outlined in response to NPF4 Policy 12 (Zero Waste).

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	Part C of Policy 1 states that development proposals must be supported by information or assessments to demonstrate that they will comply with the following relevant criteria and supporting policies, where relevant: 2. Provide required on-site infrastructure or facilities, including transport measures to minimise and manage future levels of traffic generated by the proposal; 3. Provide measures that implement the waste management hierarchy as defined in the Zero Waste Plan for Scotland; 4. Provide green infrastructure as required in settlement proposals and identified in the green network map; 5. Provide sustainable urban drainage systems in accordance with any relevant drainage strategies applying to the site or flood assessments; 7. Provide a layout and design that demonstrates adherence to the six qualities of successful places; 8. Provide for energy conservation and generation in the layout and design; and 9. Contribute to achieving the area's full potential for electricity and heat from renewable sources, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations.	The Proposed Development will provide green infrastructure, as outlined in response to NPF4 Policy 3 (Biodiversity). As outlined in response to NPF4 Policy 22 (Flood Risk and Water Management), the Proposed Development will provide sustainable urban drainage systems. Compliance with the six qualities of successful places is addressed in response to NPF4 Policy 14 (Design, Quality and Place). Given the nature of the proposed use, it will provide for energy conservation and generation. The Proposed Development will contribute to achieving the area's full potential for electricity and heat from renewable sources, given the nature of the proposed use which will facilitate the transmission of renewable energy. The Proposed Development is in accordance with Policy 1.
Policy 3 (Infrastructure and Services)	Development must be designed and implemented in a manner that ensures it delivers the required level of infrastructure and functions in a sustainable manner. Where necessary and appropriate as a direct consequence of the development or as a consequence of cumulative impact of development in the area, development proposals must incorporate measures to ensure	As required, the Proposed Development has been designed to ensure it delivers the necessary level of infrastructure required to support the transmission of electricity and will function in a sustainable manner. The relevant numbered policy requirements are addressed below in turn: Please see the response to NPF4 Policy 13 (sustainable transport) and FIFEPlan Policy 13 below. Drainage including SuDS will be provided as previously outlined in response to NPF4 Policy 22 (Flood Risk and Water Management)

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	that they will be served by adequate infrastructure and services. Such infrastructure and services may include: 1. local transport and safe access routes which link with existing networks, including for walking and cycling, utilising the guidance in <i>Making Fife's Places Supplementary Guidance</i>; 2. foul and surface water drainage, including Sustainable Urban Drainage Systems (SuDS); 3. measures that implement the waste management hierarchy as defined in the <i>Zero Waste Plan for Scotland</i> including the provision of local recycling facilities; 4. green infrastructure complying with specific green infrastructure and green network requirements contained in the <i>Making Fife's Places Supplementary Guidance</i> and settlement proposals; 6. low and zero carbon generating technologies in accordance with Policy 11 <i>Low Carbon Fife</i>; and 7. Measures incorporated in development proposals in accordance with this policy must include a timetable for delivery of the identified infrastructure and services.	Waste Management measures have been addressed in response to NPF4 policy 12 (Zero Waste) Green infrastructure will be delivered as outlined in response to NPF4 Policies 3 (Biodiversity) and 4 (Natural Places). The Proposed Development is associated with low and zero carbon generating technologies, as outlined in response to NPF4 Policy 1 (Tackling the climate change and nature crises) and 2 (Climate mitigation and adaption) An approximate delivery programme has been included in Section 3.2 of this report. As required, the Proposed Development would not result in the loss of existing valuable infrastructure. For the reasons outlined, the Proposed Development is in accordance with Policy 3.
Policy 7 (Development in the Countryside)	Development in the countryside will only be supported where it is for facilities for outdoor recreation, tourism, or other development which demonstrates a proven need for a countryside location. In all cases, development must: • be of a scale and nature compatible with surrounding uses; • be well-located in respect of available infrastructure and contribute to the need for any improved infrastructure; and • be located and designed to protect the overall landscape and environmental quality of the area.	As is outlined in Section 1.3 of this report, HND essential reinforcements in this area include the upgrading to 400kV of onshore overhead line circuits from Kintore to Tealing on the east coast, identified as the 'East Coast Onshore 400kV Phase 2 Reinforcement (Reference NOA7, Code TKUP), known as the Tealing to Kincardine Upgrade Project (TKUP). It includes upgrading to 400kV the Alyth to Longannet 275kV route, which passes through Glenrothes, Westfield and Mossmorran. As a result, new 400/132kV transformers will be required at the existing Westfield substation. In order to achieve this, an extension to the existing 275/132kV substation is required. These works will also create capacity for new 132kV transmission generation and demand connections at Westfield. As such, there is a clear locational requirement for the Proposed Development in this location, in compliance with the requirements of Policy 7.

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
		As previously outlined in response to NPF4 Policy 14 (Design, Quality and Place), the Proposed Development is of a scale and nature compatible with the surrounding uses, given that an existing substation adjoins the site. It is also well located in respect of available infrastructure. As is outlined within EIAR Chapter 5 (Need and Alternative), an extension to the existing facility, rather than constructing a completely new substation, is technically and economically the most appropriate solution. The primary justification is the need for proximity to existing infrastructure, specifically the requirement to connect to the 'spare' tower YJ085 on the west side of the existing substation. This approach is consistent with SPEN's statutory duty under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. The Proposed Development also contributes to the need for improved infrastructure given that it will reinforce the electricity transmission infrastructure in Fife, As is outlined in EIA Chapter 1 (Introduction), expected increases in onshore and offshore wind generation confirm the need to deliver significant additional transmission capacity through central and southern Scotland in the period to the end of the current decade and beyond. This leads to an overall north-south power flow through the region. Therefore, growing north to south power transfer requirements across each of the SPT network boundaries is required, driving the need for significant transmission reinforcement. The Proposed Development has also been designed to protect the overall landscape and environmental quality of the area, as addressed in response to NPF4 Policies 3 (Biodiversity), 4 (Natural Places) and 11(e).
Policy 10 (Amenity)	Development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses. Development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to: • Air quality, with particular emphasis on the impact of development on designated Air Quality Management Areas (see below); • Contaminated and unstable land, with particular emphasis on the need to address potential impacts on the site and surrounding area; • Noise, light, and odour pollution and other nuisances, including shadow flicker from wind turbines; • Traffic movements;	The requirements numbered under Policy 10 are addressed in turn below: The air quality impacts are outlined in response to NPF4 Policy 23 (Health and Safety), concluding that there are not predicted to be any significant air quality effects as a result of the Proposed Development. The Phase 1 GI Report outlines that in relation to the geo-environmental assessment, there is low to moderate potential risk to human health receptors via direct contact, oral, dermal and inhalation exposure with impacted soil, vapour and dust. There is also low to moderate potential risk to future commercial workers and future commercial/industrial uses. The report makes a number of recommendations, many of which have now been fulfilled (undertaking of FRA, topographical survey, ecological survey). As recommended, a geo-environmental / geotechnical ground investigation will be undertaken to confirm any land contamination risks, and geotechnical constraints. It is proposed that the submission of this is a conditional requirement attached to the PPiP consent. As is outlined in response to NPF4 Policy 11(e) i, the noise impacts associated with the Proposed Development will not be significant. In relation to light, there will be some exterior lighting on columns as outlined under

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	- The loss of privacy, sunlight, and daylight; - Construction impacts; - The visual impact of the development on the surrounding area; - The loss of outdoor sports facilities, open space, green networks, protected trees, and woodland; - Impacts on the operation of existing or proposed businesses and commercial operations; - Impacts on operation of existing or proposed waste management facilities; and - Where potential amenity issues are identified in the relevant settlement proposals tables or are identified as part of the assessment of the impact of a development proposal, the relevant mitigation measures will be required to be implemented by the developer to an agreed timetable and specification. The actions required to mitigate or avoid amenity impact will vary according to the circumstances in each case but will include measures such as landscape buffer strips between incompatible uses, separation distances, noise attenuation screens or fences, and bunding. Development proposals that lead to a breach of National Air Quality Standards or a significant increase in concentrations of air pollution within an existing Air Quality Management Area (AQMA) will not be supported. Statutory supplementary guidance will provide additional information, detail and guidance on air quality assessments, including an explanation of how proposals could demonstrate that they would not lead to an adverse impact on air quality.	Section 3.1 of this report, which will only be lit when the site is manned. Odour pollution and shadow flicker from wind turbines is not relevant. In relation to traffic movements, as is outlined in response to NPF4 Policy 13 (Sustainable Transport), it has been demonstrated within the Transport Statement that the Proposed Development will not produce any material traffic impact on the local road network. The Proposed Development will not result in any loss of privacy, sunlight or daylight given its location. Submission of a Construction Traffic Management Plan (CTMP) and CEMP will be a conditional requirement attached to the planning permission (if granted). The EIA Chapters cover the construction phase of the Proposed Development. In this respect, Chapter 10 (Noise) concludes that noise impacts from construction traffic are likely to be Short Term, Negligible on all roads, which is Not Significant. Chapter 9 (Air Quality) concludes that with the recommended mitigation measures in place, the construction_dust impacts are judged as being 'not significant'. The visual impact of the Proposed Development is outlined in response to NPF4 Policy 11 (e – ii). Although some significant impacts are likely, these are largely localised, and appropriate design measures have been applied (which will likely lessen the impacts after year 15 of operation). As such, the Proposed Development is considered to be acceptable from a landscape and visual impact perspective and in accordance with NPF4 Policy 11. The impacts on trees and green networks is outlined in response to NPF4 Policies 3 (Biodiversity), 4 (Natural Places) and 6 (Forestry, Woodland and Trees). There will not be a significant impact in this respect. There will be no loss of outdoor sports facilities or open space. The documentation submitted in support of the planning application gives no indication of any potential impacts on the operation of existing or proposed business and commercial operations There will be no impacts on operation of existing or proposed waste management facilities. Any recommended mitigation measures outlined within the supporting documents will be delivered as required to mitigate or avoid amenity impact. The Proposed Development is therefore in accordance with Policy 10.
Policy 11 (Low Carbon Fife)	Planning permission will only be granted for new development where it has been demonstrated that:	In relation to point '1', as is outlined in response to NPF4 Policy 1 (Tackling the Climate and Nature Crises) and 2 (Climate Mitigation and Adaption), the Proposed Development is an essential part of the wider TKUP project,

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	1. The proposal meets the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards), and that low and zero carbon generating technologies will contribute at least 15% of these savings from 2016 and at least 20% from 2020; 2. Construction materials come from local or sustainable sources; 3. Water conservation measures are in place; 4. Sustainable urban drainage measures will ensure that there will be no increase in the rate of surface water run-off in peak conditions or detrimental impact on the ecological quality of the water environment; and 5. Facilities are provided for the separate collection of dry recyclable waste and food waste. All development should encourage and facilitate the use of sustainable transport appropriate to the development, promoting in the following order of priority: walking, cycling, public transport, cars.	which is being delivered to facilitate the earliest possible decarbonisation of the energy system and the achievement of “Net Zero” no later than 2045, in accordance with the objectives of the Climate Change (Scotland) Act 2009 (as amended). As required by point ‘2’, construction materials will come from local or sustainable sources where possible In relation to point ‘3’, water conservation measures will be put in place where relevant and appropriate. In relation to point ‘4’, sustainable urban drainage measures, this will be provided, as outlined in response to NPF4 Policy 22 (Flood Risk and Water Management). In relation to point ‘5’, facilities are not required for this waste, given that the site will be unmanned, other than for typical maintenance, or if emergency works were necessary. Given the nature of the Proposed Development, sustainable transport is not considered to be relevant given that the Proposed Development will not be accessible to the public, and access to the site is limited to authorised persons only. There will likely only be an average of one trip to the site per month for check-up and maintenance purposes. The Proposed Development is therefore in accordance with Policy 11.
Policy 12 (Flooding and the Water Environment)	Development proposals will only be supported where they can demonstrate that they will not, individually or cumulatively: • Increase flooding or flood risk from all sources (including surface water drainage measures) on the site or elsewhere; • Reduce the water conveyance and storage capacity of a functional flood plain; • Detrimentially impact on ecological quality of the water environment, including its natural characteristics, river engineering works, or recreational use; and • Detrimentially impact on future options for flood management. To ascertain the impact on flooding, developers may be required to provide a flood risk assessment addressing potential sources	The SEPA flood maps indicate that the site lies outwith the flood risk areas associated with fluvial and coastal flooding. The SEPA flood maps indicate that the site may be at risk from pluvial flooding. Areas of low to high likelihood surface water flood risk are shown within the site area, associated with low-points in the topography, around the south-eastern and northern boundaries of the Proposed Development site. The proposed substation platform is located entirely outwith the area at risk of flooding in a 1 in 200 year + Climate Change (CC) event. A SuDS (Sustainable Drainage System) basin is proposed to be located immediately south-east of the platform within the current area at risk of flooding. To accommodate this SuDS feature, it is proposed that Unnamed Watercourse 1 will be realigned around the eastern and southern perimeter of the basin, before reconnecting to the existing channel downstream of the SuDS basin. The FRA states that the SuDS basin and watercourse realignment should be designed to ensure that there is no loss of floodplain capacity and no increase in flood risk for others.

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	of flooding and the impact on people, properties, or infrastructure at risk. Flood risk assessments (FRA) should: - highlight the measures proposed to mitigate the flood risk and the timescales to implement those measures; and - include an assessment of potential impacts on water quality and the water environment. Drainage Assessments, proportionate to the development proposal and covering both surface and foul water, will be required for areas where drainage is already constrained or otherwise problematic, or if there would be off-site effects.	As required, the FRA highlights measures required to mitigate the flood risk, although does not include timescales to implement these measures or an assessment of potential impacts on water quality and the water environment. This information can be provided as a conditional requirement if necessary. As is outlined in response to Policy 22 (Flood Risk and Water Management), the Flood Risk Assessment submitted with this application demonstrates that the Proposed Development will not increase flood risk or detrimentally impact on future options for flood management. It will also not reduce the water conveyance and storage capacity of a functional flood plain or detrimentally impact on future options for flood management. Please see the Flood Risk Assessment submitted in support of the application for further information. The Proposed Development will also not detrimentally impact on ecological quality of the water environment, as demonstrated within the Ecological Appraisal submitted in support of the application. As required, the FRA identifies necessary mitigation measures A detailed drainage strategy will be submitted in support of a forthcoming AMSC application. The Proposed Development is therefore in accordance with Policy 12.
Policy 13 (Natural Environment and Access)	Development proposals will only be supported where they protect or enhance natural heritage and access assets including: - designated sites of local importance, including Local Wildlife Sites, Regionally Important Geological Sites, and Local Landscape Areas; - woodlands (including native and other long established woods), and trees and hedgerows that have a landscape, amenity, or nature conservation value; - biodiversity in the wider environment; - protected and priority habitats and species; - landscape character and views; - carbon rich soils (including peat); - green networks and greenspaces; and	The site is not subject to any landscape or nature related designations. As is outlined within the response to NPF4 Policy 6 (Forestry, Woodland and Trees), the Proposed Development will result in the loss of trees and hedgerows, but the majority of these are of moderate quality (Category B) and it is not anticipated that their loss will have a significant adverse impact on the amenity or landscape of those areas. Furthermore, replacement planting on site is proposed, in addition to offsite in order to comply with significant biodiversity enhancement requirements (NPF4 Policy 3). Please see the response to NPF4 Policy 4 (Natural Places) in relation to biodiversity and the presence of protected and priority habitats and species on site. All necessary ecological specifications and mitigation measures can be detailed within a Landscape and Ecological Management Plan (LEMP) or similar document to form a conditional requirement attached to the PPIP and will be delivered in accordance with the requirements of the EPS License. In relation to impact on landscape character and views, this has been addressed in response to NPF4 Policy 11 (e ii) Please also see the LVIA for further information. As required, an assessment of the potential impact on natural heritage, biodiversity, trees and landscape have been provided via the relevant EIAR Chapters and Reports (Archaeology and Heritage Assessment, Ecological Appraisal Report, Arboricultural Report, and Landscape and Visual Impact Assessment). These demonstrate that natural heritage assets will be protected or enhanced as required.

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	core paths, cycleways, bridleways, existing rights of way, established footpaths and access to water-based recreation. Development proposals must provide an assessment of the potential impact on natural heritage, biodiversity, trees and landscape and include proposals for the enhancement of natural heritage and access assets, as detailed in Making Fife's Places Supplementary Guidance. Development proposals likely to have a significant effect on a Natura 2000 site will not be in accordance with the Plan if it cannot be ascertained, by means of an Appropriate Assessment, that they will not have an adverse effect on the integrity of Natura 2000 site(s). Unless there is an imperative reason of overriding public interest development that impacts negatively on these sites will not be supported. In the particular case of development proposals that affect national sites, such proposals will only be permitted where the objectives of the designation and the overall integrity of the area will not be compromised or where any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.	As is outlined within the response to NPF4 Policy 5 (c) (Soils), the "Scotland's Soils" map indicates that the Proposed Development is not on peatland, carbon rich soils or priority peatland habitat In relation to impact on green networks and greenspaces, this is addressed in response to NPF4 Policy 4 (Natural Places). In relation to paths and cycleways, as is outlined in response to NPF4 Policy 13 (Sustainable Transport), there is generally no pedestrian activity adjacent to the site given its rural nature. The site has limited recreation value. There is no public access of Core Paths that pass through the site. For the reasons outlined, the Proposed Development is considered to comply with Policy 13.
Policy 14 (Built and Historic Environment)	The Council will apply the six qualities of successful places when considering development proposals. New development will need to demonstrate how it has taken account of and meets each of the following six qualities: - distinctive; - welcoming; - adaptable; - resource efficient;	As is outlined in response to NPF4 Policy 14 (Design, Quality and Place), the design is limited by the fact that it needs to prioritise both functionality and practicality to ensure a reliable and efficient power supply. This involves carefully arranging equipment, considering spatial separation, and incorporating safety and maintenance needs. As is outlined within the LVIA, the landscape and visual sensitivities of the site and its context have influenced the current masterplan through an iterative design process, insofar as this is possible with a highly restricted electrical layout which needs to link with existing OHLS and towers. In relation to the Historic Environment, as outlined in response to NPF4 Policy 7 (Historic Assets and places), the site does not contain any world heritage sites, scheduled monuments, registered parks and gardens,

Policy	Summary/Relevant Policy Extracts	Proposed Development Conformity
	• safe and pleasant; and • easy to move around and beyond. Development which protects or enhances buildings or other built heritage of special architectural or historic interest will be supported.	registered battlefields, listed buildings or conservation areas and so, therefore, there would be no direct impacts in that regard as a result of the site's development. The Archaeology and Heritage Assessment Report concludes that the Proposed Development of the site would not give rise to any loss of significance from any of the designated historic assets which are located within its wider surroundings. The Proposed Development therefore complies with Policy 14.
Policy 15 (Minerals)	Minerals that are, or may be, of economic or conservation value will be protected from development which could prevent or jeopardise their extraction. Prior extraction of minerals should be facilitated and encouraged for any substantial new development sites, in line with national policy, with the aim of preventing sterilisation of minerals.	Please see the response to NPF4 Policy 33 (Minerals), which demonstrates compliance with this Policy.

06.

Conclusion

6. Conclusion

- 6.1.1 The Proposed Development is an essential part of the wider TKUP project, which is being delivered 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. The Proposed Development will therefore contribute to tackling the global climate crises by introducing more flexibility into the grid to support the roll out of renewable energy within Scotland and transition to net zero carbon energy sources
- 6.1.2 The Proposed Development is designated as a National Development which is defined within NPF4 as significant developments of national importance that will help to deliver our spatial strategy and that this designation means that the principle of the development does not need to be agreed in later consenting processes. The Proposed Development also represents Essential Infrastructure, as defined within Annex F of NPF4. The principle of the development is therefore supported by National Policy.
- 6.1.3 The Proposed Development accords with relevant Development Plan policies when read as a whole.
- 6.1.4 NPF4 is the up to date Development Plan document and the Proposed Development draws significant support from the policies within this. As has been demonstrated within **Table 5.1**, it accords with Policy 1 (tackling the climate and nature crisis) which should be afforded significant weight (as it is a foundational, overarching policy that mandates this level of consideration for the global climate and nature crises) and Policy 11 (Energy). The proposal accords with other NPF4 policies, including those relating to soils, sustainable transport, natural places and biodiversity.
- 6.1.5 FIFEplan is a more dated document and does not contain any policies that specifically address transmission infrastructure such as the Proposed Development. However, the proposal is in general accordance with the LDP, as demonstrated within **Table 5.2**.
- 6.1.6 The 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.
- 6.1.7 Aside from a landscape and visual impact perspective (where significant residual effects are contained within close proximity of the site), where potential significant effects arise, appropriate mitigation measures are proposed such that no significant residual effects arise.
- 6.1.8 The Proposed Development delivers essential infrastructure improvements whilst ensuring biodiversity enhancement and local socio-economic benefits where possible, in order to contribute to Net Zero and in doing so addresses both the global climate and nature crisis.
- 6.1.9 Additionally, as set out in Chapter 4 of this Planning Statement, a significant consideration is the range of National Policy and Legislation in place both through the Scottish Government and UK Government setting net-zero targets and requiring the transition away from fossil fuels as energy sources. In this regard there is a recognition by both the UK and the Scottish Government of the importance of renewable energy related uses as a part of this net-zero future.

- 6.1.10 As assessed, the substantive merits of this proposal, in compliance with the development plan conclude that this application should meet with a positive recommendation for approval of Planning Permission in Principle by the Local Planning Authority.