

Response to the Aspen – Onshore Environment Impact Assessment Scoping Report

Newtonhill, Muchalls & Cammachmore Community Council

[23rd July 2026]

Executive Summary

The Newtonhill, Muchalls & Cammachmore Community Council welcome the opportunity to provide feedback on the Cerulean Winds' Environmental Impact Assessment Scoping Report, being part of the Pre-Application Consultation process. The Community Council has identified a number of significant modifications that should be incorporated into any future Environmental Impact Assessment relating to the onshore section of the Aspen project. Most notably, concerns are raised about the impact upon the local community and the environment by the excavation of trenches and joint-bays intended to contain the 220 kV transmission cables.

Of primary concern is the lack of a bedrock depth survey. Local knowledge leads us to believe that trench excavation for transmission cables and joint bays will require rock breaking. If this is the case, then that will significantly change the operation to install the Onshore Transmission Cables; timescales will increase dramatically, as will the amount of noise and dust created. All of these will have a negative impact on health and wellbeing within our communities.

The proposed scoping corridor is not acceptable to our community. It is unreasonable to route the cables directly to the north and to the west of Newtonhill, there are also unacceptable impacts on Cammachmore, Chapelton and Muchalls, including St. Ternan's church which is in the middle of the scoping corridor.

LDP Policy and NPF4 Policy support the argument against the cable corridor linked to the proposed landfall at Craig Stirling. A corridor roughly North by East from Hurlie to the coast, thus avoiding built-up areas, makes much more sense. This will also avoid approximately five kilometres of cutting trenches; with 9 trenches in parallel across the width of the corridor. This would amount to the saving of 45 kilometres of cutting trenches, potentially through bedrock.

It is unreasonable to route the cable corridor, with its associated loss of amenity and negative impact on wellbeing, so close to the homes of well over 3,000 residents, when there is an abundance of open countryside between Muchalls and Stonehaven that would be better suited as an alternative route.

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1 Introduction

Cerulean Winds registered a Pre-Application Consultation with Aberdeenshire Council on the 29th of April 2026 for the onshore section of their Aspen project. At that time Cerulean Winds published an Environmental Impact Assessment Scoping Report (the Scoping Report). This document represents the response by the Newtonhill, Muchalls & Cammachmore Community Council (the Community Council) to that Scoping Report.

The Scoping Report is a well written and informative document. It does have some gaps that will be addressed here using section headings from the Scoping Report and some new sections for clarity. A consequence of using Scoping Report headings is that some points are repeated under different headings.

We are pleased to note that section 5.2.6 of the Scoping Report states: “The Applicant intends to proactively engage with communities and stakeholders and to take comments and feedback into account when refining the design of the Proposed Development”. Feedback from communities and stakeholders will be reflected in the Environmental Impact Assessment (EIA) which will accompany future planning applications.

1.1 Evidence Gathering and Community Engagement

The Community Council routinely takes every opportunity to engage with our local community. We have successfully sought opinions from residents on many occasions regarding a variety of topics. Feedback has informed us that the community knows that they can rely on the Community Council to represent their views. Information has been gathered at community group events, by visits to residents, and by casual meetings.

The Community Council hosted a public meeting on 11th June at the Skateraw Hall, Newtonhill. We wish to thank Cerulean Winds for providing valuable help and information at that meeting. Copies of the input from residents were shared with Cerulean Winds.

1.2 Contact for report

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1.3 References

- [Town and Country Planning \(Scotland\) Act 1997](#)
- [National Planning Framework 4](#) (NPF4)
- [Aberdeenshire Local Development Plan 2023](#) (LDP 2023)
- [Platinum Jubilee Coastal Path](#)
- K. ATES, H. F. (2018). Exposure Analysis of a Human Body due to Underground Power Cables and Magnetic Field Mitigation. *International Conference on Advanced Technologies, Computer Engineering and Science (ICATCES'18)*, (pp. 642-645). Safranbolu, Turkey.
- Kayhan Ates, H. F. (2016). Magnetic Field Exposures due to Underground Power Cables: A Simulation Study. *Proceedings of the 2nd World Congress on Electrical Engineering and Computer Systems and Science (EECSS'16)*, (p. 133). Budapest, Hungary.
- *BMJ* 2025;391:e081193 The impact of noise pollution on health

2 Overview of Aspen project

Based on information available in the Scoping Report, the Aspen project is expected to include up to 72 turbines located 84 km offshore from Peterhead, in the heart of the North Sea, near existing oil and gas platforms. The electricity generated will power offshore oil and gas facilities and be exported to the UK electricity grid.

From landfall, 220 kV cables will run underground to a new 220 kV to 400 kV substation. From there, 400 kV underground cables will run to the proposed Hurlie substation at Fetteresso, near Stonehaven, which has been identified by the National Electricity System Operator (NESO) as the grid connection point.

The Scoping Report states that the construction phase of the Proposed Development is anticipated to be up to a total of approximately three years (excluding commissioning). Installation of the Onshore Transmission Cables would be temporary and transient in nature, progressing sequentially along the length of the Onshore Transmission Cables Corridor, with works in any given localised area lasting for a shorter duration than the overall programme.

The operational life of the project is anticipated to be approximately 35 years.

3 The Proposed Development

Scoping Report section 3.4.1 indicates that the construction phase of the Proposed Development is anticipated to be up to a total of approximately three years (excluding commissioning), representing a reasonable worst-case for the purposes of the assessment. Installation of the Onshore Transmission Cables would be temporary and transient in nature, progressing sequentially along the length of the Onshore Transmission Cables Corridor, with works in any given localised area lasting for a shorter duration than the overall programme. Scoping Report section 16.8.2 states that construction activities would only be close to Noise Sensitive Receptors for a very short period, typically less than a week.

The Community Council is concerned that the Scoping Report fails to provide sufficient information regarding the elapsed time interval, in any single location, between a green-field site before trenching activity starts and the restored green-field site (excluding the time for the grass to grow) after cable installation. The EIA needs to address this concern.

3.1 Cable Corridors

Scoping Report table 3.1 specifies each cable trench as 3.5 m deep and 6.85 m wide, which would provide sufficient space to accommodate two single-decker buses side-by-side with space to spare; the bus roof being at ground level.

Given the figures above, a one metre length of each trench corresponds to 24 cubic metres. If the density of trench material is taken to be 1.5 tonnes per cubic metre, then each metre length of trench will require approximately 36 tonnes of material to be excavated and then backfilled. With nine 220 kV trenches in parallel, each kilometre of cable corridor will require approximately 325,000 tonnes of material to be excavated and then backfilled. A total movement of 650,000 tonnes for each kilometre of cable corridor.

3.2 Substation

The substation will be a large-scale industrial complex set in a rural landscape. It will have no architectural merit, and to reduce the visual impact, the whole substation should be screened by earthworks and mature trees. To further minimise the visual impact of the substation, it should not have any lighting under normal operating conditions.

4 Site Selection and Consideration of Alternatives

An extremely important piece of information is missing from the site selection criteria, which has resulted in a flawed preferred option. Scoping Report section 16.8.2 states that construction activities would only be close to Noise Sensitive Receptors (NSRs) for a very short period, typically less than a week, and noise impacts would be very short term and temporary in nature i.e. only when directly passing an NSR. This implies that nine, 3.5 m deep trenches will be dug in parallel, the cables installed and the trenches backfilled within the space of one week. This timescale appears to be optimistic for even the best ground conditions where the soil and sub-soil combined are more than 3.5 m deep. If, however, it is necessary to excavate through rock, then the process will take a great deal longer and will generate significantly more noise. This has proved to be the case for house building at Chapelton and the development to the south of Park Place, Newtonhill.

In order to be able to predict how long it will take for cable installation; a bedrock depth survey is required to measure the thickness of soil above the bedrock.

Scoping Report section 6.2.2 lists four possible landfall areas, but does not include option 5 (Newtonhill) as shown in Scoping Report figure 6.1 (Cable Landfall Options). A Black-Red-Amber-Green (BRAG) based assessment for landfall location has not been published. The Community Council submits that, if a bedrock depth survey shows a much more difficult route for transmission cables corridor than anticipated, then the

BRAG assessment may provide a different result. Landfall further south could cut five or more kilometres from the cable corridor, thereby reducing the amount of trench material to be moved by 3,250,000 tonnes.

5 Climate

Predicting climate and climate change has become more of an art than a science. It is safe to say that the past ten years has seen more frequent heavy storms, once called 100-year events.

The major storm on 12th August 2020 resulted in considerable flood damage around Newtonhill and Muchalls. Recent flash floods have also caused several major disruptions on the A92 at various places between Bridge of Muchalls and Portlethen. The Elsieck and Pheppie Burns, both have a recent history of flooding; each having lost a road bridge due to a flash flood. The bridges have since been replaced. These events illustrate how vulnerable built infrastructure is, to recent changes in climate and extreme storm events.

Just for information: on some occasions, snow and ice have caused the hill on the A90 (Fastlink), just north of Stonehaven, to be closed.

6 Terrestrial Ecology

The EIA Report must ensure to include the following species that have been observed locally:

- Roe deer, including females with young that have been seen grazing along the Elsieck Burn and the fields adjacent to the A92
- Common seals, which occasionally leave their pups ashore
- Common dolphins, often seen close to the shore
- Northern Marsh Orchid blooms along the field by the Elsieck Burn.

The following plants have been identified from the British and Irish Botanical Society of Great Britain (BSBI), as being nationally threatened and locally rare:

- Purple Milk-vetch (*Astragalus danicus*) - this is endangered. Facing a very high risk of extinction in the wild
- Field Woundwort (*Stachys arvensis*) - vulnerable
- Creeping Willow (*Salix repens*) - is considered near threatened nationally, but not considered rare locally, hosts a rare moth *Phyllonorycter quinqueguettella* which has been recorded near the breeding puffin colony which also hosts a number of other seabird species
- Kidney Vetch (*Anthyllis vulneraria*) is considered near threatened nationally, but not considered rare locally. However, it is the sole food plant of the Small Blue Butterfly which is a protected species. This is found around Cranhill in the path of the proposed cables.

NPF4 Policy 3, 'Biodiversity' stresses that Biodiversity is enhanced and better connected, including through strengthened nature networks and nature based solutions. The EIA must explain what opportunities exist for biodiversity enhancement along the cable route. The EIA must ensure that habitats are not destroyed by sediment runoff during construction.

7 Terrestrial Ornithology

The EIA Report must ensure to include the following species that have been observed locally:

- Heron that feed along the Elsieck Burn. In Scotland and across the UK, it is protected under the Wildlife and Countryside Act 1981
- Hoopoe (summer visitor)
- Puffin colony on Craig Stirling cliffs
- The area also hosts: guillemots, razorbills, kittiwakes, herring gulls, oyster catchers, terns, and fulmars.

8 Landscape and Visual

East Cammachmore and West Cammachmore should be included in the list of small settlements in Scoping Report section 10.6.10.

Please add photomontage LI Type 1 views of substation A & B from Newtonhill flyover (390368, 793320) and from Chapelton (389280, 793579) to the list in Scoping Report table 10.4.

Residents have asked for three-dimensional images that illustrate the different phases of trench construction and how mitigations will reduce the negative impacts over time. These could be, as observed from the East Cammachmore railway bridge and the view point at Braehead (Skateraw Road, Newtonhill).

A similar three-dimensional illustration of what the substation site would actually contain would be of interest to many residents.

9 Archaeology and Cultural Heritage

Of specific concern to the Community Council is the impact of trenching activity on St. Ternan's Church.

9.1 St. Ternan's church

St. Ternan's Church (Scoping Report asset 160) is in the middle of the scoping corridor, as shown on figure 11.2a of the Scoping Report. Construction noise, compound noise, vibrations, dust, and construction vehicles must not be allowed to disturb regular and incidental church services.

10 Geology, Soils and Peat

There is a large cave which penetrates the headland at Craig Stirling. The mouth of the cave shows extensive rockfall, which may indicate that the headland is geologically unstable.

Postcode AB39 in Aberdeenshire is classified as risk class 6 (Very High) for radon gas. An estimated >30% of homes in this area have radon levels above the UK action level of 200 Bq/m³. The Environmental Impact Assessment needs to assess the risk of radon gas release during earthworks, especially if rock breaking is involved.

11 Hydrology and Flood Risk

NPF4 Policy 20, 'Blue and green infrastructure' lists as its policy outcomes: climate mitigation, nature restoration, biodiversity enhancement, flood prevention and water management. Similarly, NPF4 Policy 22, 'Flood Risk and Water Management' seeks to ensure that places are resilient to current and future flood risk.

Rock breaking and/or climate change has brought about changes to local water levels and flows. Homeowners in the new Barratt development on the moor to the south of Park Place, Newtonhill have complained about waterlogged gardens. With already saturated ground, there is little capacity to cope with severe storms.

The Elsick and Pheppie Burns, both have a recent history of flooding and each having lost a road bridge due to a flash flood. The bridges have been replaced. This illustrates the power behind the water in flood conditions.

The A92 at Muchalls and at Cammachmore has a history of excess surface water and flooding, illustrating the volume of surface water runoff.

Scoping Report section 13.5.1 describes the flood risk for the Elsick Burn as Moderate, however the SEPA flood map (Figure 1) shows the flood risk to be High. The Elsick Mill has suffered extensive flooding and has installed flood defences. In 2016, Network Rail undertook scour protection work to Elsick railway viaduct piers.

Scoping Report section 13.5.9 cites the British Geological Society (BGS) 1:625 hydrogeological map. Whilst the map shows a low productive aquifer in most areas, there is a moderately productive aquifer on the hill immediately to the north of the Elsick Burn between the A92 and the East Coast Railway. Cable trench excavation in this area could lead to additional flooding. Extra measures need to be put in place to prevent sediment runoff contaminating the Elsick Burn and flooding the Elsick Mill again.

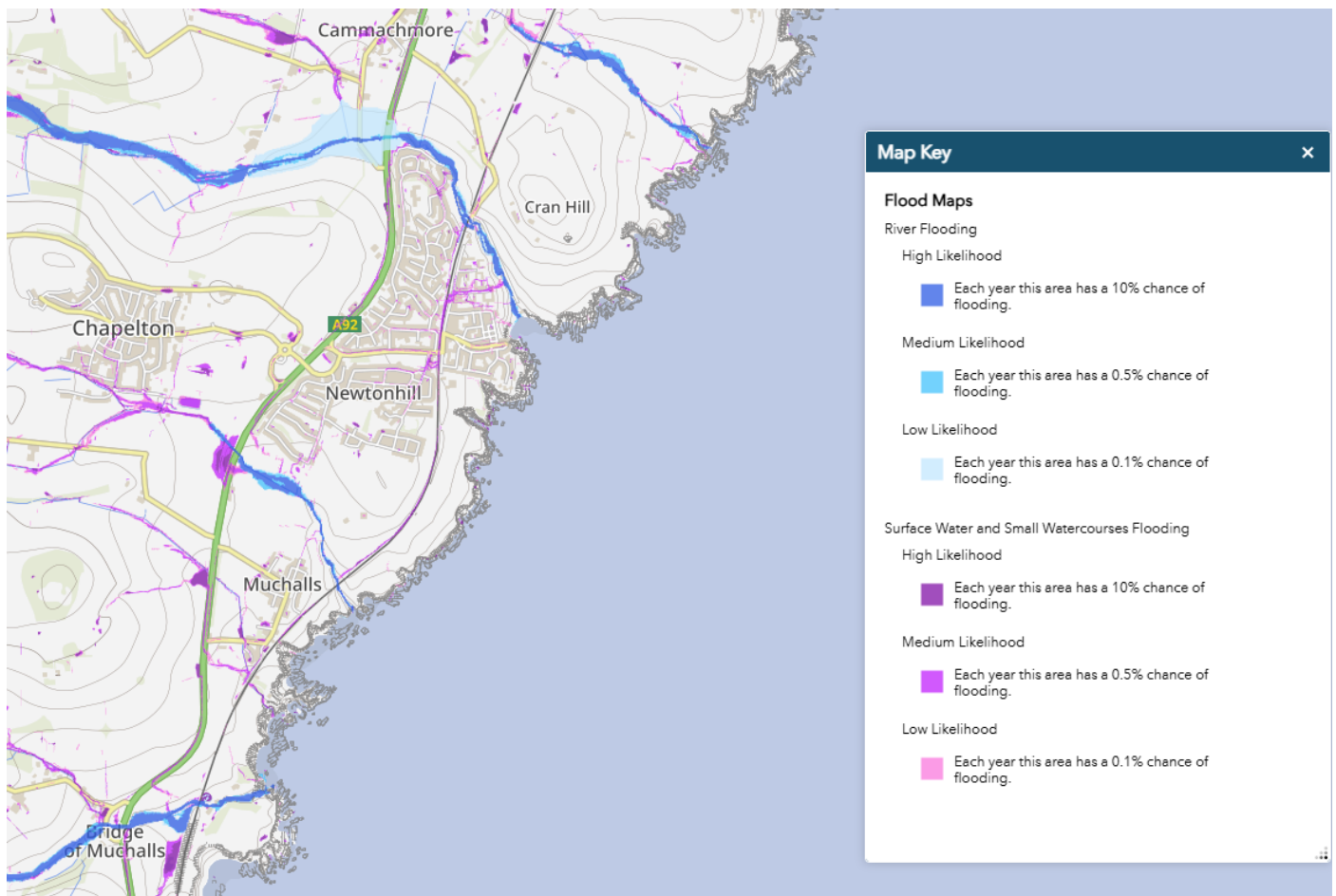


Figure 1 SEPA Flood map

12 Traffic and Transport

Given the need for considerable numbers of movements of plant, materials, staff, HGVs and abnormal loads, the proposed Environment Impact Assessment must include a Construction Traffic Management Plan (CTMP). The following points need to be considered in that plan:

- Right-turns across dual carriageways must be prohibited
- Many local roads are single track with limited passing places and deep roadside ditches
- Potholes and other road defects need to be repaired as soon as they appear
- Workforce parking must not block roads
- Ensure that mud and other debris are removed from public roads on at least a daily basis
- HGVs must be excluded from parking/waiting in residential areas
- HGVs must be excluded from parking/waiting at local supermarkets
- Construction vehicles must be excluded from parking/waiting at the Chapelton Park & Choose
- What are the predicted HGV movements per day during peak construction?
- What construction traffic volumes are expected on the A90, A92 and local roads?
- Will abnormal loads require temporary road closures or diversions?
- How will construction traffic avoid peak commuter times in Newtonhill and Stonehaven?
- Will any temporary road/path closures be required, and how will they be communicated?
- Will trees need to be cut back or removed to allow vehicular access?
- Will walls or fences need to be removed to allow vehicular access and when will they be replaced?
- Will the developer commit to a local point of contact for two-way communication regarding transport issues?
- What arrangements will be made to prevent queueing delivery vehicles?
- What methods will be used to keep residents informed?
- The safe walking route between Skateraw and Newtonhill Primary School, via the track alongside the Elsieck Burn, must remain open and safe to walk.

12.1 Active Travel

NPF4 Policy 13, 'Sustainable transport' supports outcomes for more, better, safer and more inclusive active and sustainable travel opportunities. The nature of the Northeast road network is that many active travel routes utilise C-class roads to avoid the A92. Many of these roads are single-track, and construction traffic must not cause a loss of amenity.

The Cranhill Coastal Path is a key local route that runs alongside the railway, north from Dunarguin. It is a safe active travel route between Newtonhill and Portlethen, and it is imperative that arrangements are put in place to mitigate construction activity.

Temporary roads within the route of the proposed cable corridor may possibly complement the existing active travel infrastructure. Consideration should be given to consulting local communities and landowners with the view to retaining some temporary roads to facilitate community active travel routes. NESTRANS recorded 68% support for the A92 Active Travel Route (Aberdeen to Laurencekirk Multi-Modal Corridor Study Project 60706227 June 2025, appendix – C).

13 Air Quality

Postcode AB39 in Aberdeenshire is classified as risk class 6 (Very High) for radon gas. An estimated >30% of homes in this area have radon levels above the UK action level of 200 Bq/m³. The Environmental Impact Assessment needs to assess the risk of radon gas release during earthworks, especially if rock breaking is involved.

Experience from recent house building just south of Newtonhill, has shown that ground rock breaking leaves a cloud of dust on houses, gardens, cars, and washing hanging outside. How will this be ameliorated for residents living in the affected area?

14 Noise and Vibration

NPF4 Policy 14, 'Design, quality and place' requires that places must be pleasant: supporting attractive natural and built spaces with protection from the elements to create attractive and welcoming surroundings, including provision for shade and shelter, mitigating against noise, air, light pollution and undesirable features.

Permanent removal of trees and bushes along the cable corridor will create gaps in the natural noise barriers that filter out road noise from the A90 and A92. NPF4 Policy 23e, Health and safety, states:

'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'.

Scoping Report sections 16.4.4, 16.8.6, and 16.12.2 say that no substantial noise impacts are anticipated along cable corridor. Noise assessment along the Onshore Transmission Cable Corridor for trenching and backfill, has been **scoped out**, as noise impacts are anticipated to be limited due to the transient nature of the activity. The topography of the land along the Elsie Burn allows noise to be amplified, as in an amphitheatre. Therefore, additional noise baseline recordings will be required along the northern perimeter of Skateraw and Newtonhill (from the sea to the A92), between Newtonhill and Chapelton, and to the west of Muchalls. Residents living in these locations fall into the category of Noise Sensitive Receptors and their health and wellbeing may suffer from undue noise and vibration. If a bedrock depth survey finds that trench construction requires rock breaking, then it will certainly be the case that noise levels must be measured prior and during construction and kept within acceptable levels.

BSI Standards Publication BS 5228-1 'Code of practice for noise and vibration control on construction and open sites' stresses the importance of community relations and avoiding neighbourhood nuisance. The Construction (Design and Management) Regulations 2007 (CDM 2007) set out legal duties for managing health, safety, and welfare throughout UK construction projects. One key aim is to improve the planning and management of projects from the very start; identify risks early on so that they can be eliminated or reduced at the design or planning stage and the remaining risks can be properly managed.

Construction noise must not be allowed to disturb services at St. Ternan's Church.

15 Tourism and Recreation

The Newtonhill, Muchalls & Cammachmore Local Place Plan section 4.2 states:

'Tourism plays a significant role in many parts of the world, providing income and benefits to various regions. In order to revitalize the northeast of Scotland, it is essential to attract tourists who will spend their money here. Enterprising individuals can create opportunities that will not only employ local people but also boost the local economy. To attract tourists, the Northeast must develop itself as a desirable tourist destination with well-maintained and constantly improved infrastructure. It is essential to preserve the natural environment and to protect those amenities that will encourage tourists to visit, stay, and spend their money locally. Fortunately, we are blessed with stunning natural coastal scenery that tourists are eager to explore.'

The following points need to be considered in the EIA:

- How will the project ensure minimal disruption to coastal recreation near the landfall site?
- The Platinum Jubilee Coastal Path (Core Path) must remain open during construction work.
- An Airbnb rental business, based in Cammachmore, refer to their location as green and peaceful. They are very concerned that the Transmission Cables Corridor will have a very negative impact on their business.

16 Land Use and Agriculture

The majority of the land in the scoping area is farmland, either for crops or for grazing livestock. In both cases the quality of the topsoil is vital to the productivity of the land. In order to prevent a sterile corridor, transmission cable trenching operations must not allow topsoil to become contaminated by poorer quality subsoils, gravel or rock. Neither must the topsoil be contaminated by materials used for haul roads and compounds.

The EIA must ensure that topsoil is not contaminated or lost by sediment runoff during construction.

17 Trees

National Grid requires that there are restrictions on the planting of trees and hedges over cables or within 3 m of the cable trench to prevent encroachment by vegetation. Tree roots may penetrate the cable backfill surround which in turn may affect the cable rating or even result in physical damage to the cable.

Permanent removal of trees and bushes along the cable route will create gaps in the natural barriers that filter out road noise from the A90 and A92. Loss of some trees can create wind corridors that result in more tree loss.

NPF4 Policy 6, 'Forestry, woodland and trees' seeks to protect existing woodland and trees. 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.*

Aberdeenshire Council's Trees and Development Planning advice PA2023-20 expects new and compensatory planting of trees. Where will these trees be planted?

18 Health and Wellbeing

British Medical Journal article *BMJ* 2025;391:e081193 'The impact of noise pollution on health' states:

'Noise pollution can disturb sleep, disrupt daily activities such as communication and rest, and cause negative cognitive and emotional reactions such as feelings of displeasure, nuisance, disturbance, or irritation (termed noise annoyance). Noise pollution is a psychosocial stressor that acts through direct and indirect pathways, triggering physiological responses that activate the body's stress systems'.

Noise pollution is a significant concern, with long-term exposure contributing to health issues such as sleep disturbances, cardiovascular diseases, and cognitive impairments. NPF4 recognizes the need for effective noise management, including robust regulations and improved urban planning, to mitigate the adverse effects of noise pollution on public health and wellbeing.

Wellbeing is a theme that runs throughout NPF4, it is mentioned 77 times. NPF4 Policy 23b, Health and safety, states:

'Development proposals which are likely to have a significant adverse effect on health will not be supported. A Health Impact Assessment may be required'.

Local health boards are designated as key agencies under Scottish planning legislation, meaning they have statutory responsibilities for specific topic areas that can impact planning decisions, particularly those affecting public health and community wellbeing.

It is essential for the health and wellbeing of each member of our community, to create and maintain a place fit to grow and thrive. This is encapsulated in the Scottish national spatial strategy which is worth repeating here.

'Scotland's future places will have homes and neighbourhoods that are healthier, affordable and vibrant places to live. We have an opportunity to significantly improve our places, address longstanding inequality and eliminate discrimination, helping to transform our country for the better. Cleaner, safer and greener places and improved open spaces will build resilience and provide wider benefits for people, health and biodiversity, in a balanced way'.

NPF4 Policy 10, 'Coastal Development' takes into account the unique nature of the coastal zone as defined in LDP 2023. It seeks to protect coastal communities and assets and support resilience to the impacts of climate change. In particular, R1.3 states:

'In the coastal zone development must require a coastal location or there must be clear social, economic, environmental or community benefits arising. In either case there must be no coalescence of coastal developments or adverse impacts on natural coastal processes or habitats'.

In many of its policies, NPF4 mentions the need to support and improve community resilience. This is a fundamental part of National Planning Framework and must be central to the proposed development. We are aware that our communities' priorities have changed post Covid pandemic and as such, mental health, local living and working from home, have become more significant issues. Green spaces, play spaces and active travel have all become more important for both health and wellbeing.

18.1 Green Open-Spaces

Local residents are adamant that green open spaces within and surrounding Newtonhill, Muchalls and Cammachmore must be preserved. Residents have told us that living close by or having access to green space benefits physical and mental health.

The need for green spaces, in particular the area to the north of Newtonhill is seen as vitally important to the wellbeing of the community. There must be no loss of visual amenity during construction.

18.2 Safer Routes to School

The safe walking route between Skateraw and Newtonhill Primary School, via the track alongside the Elsieck Burn, must remain open and safe to walk, especially during construction work.

18.3 Communication

The developers and the construction company must provide regular, effective communication updates to the community. Many residents can be reached via facebook, but not everybody has access to electronic media. Other methods of communication need to be considered.

19 Construction Environmental Management Plan (CEMP)

The Scoping Report commits to providing a Construction Environment Management Plan (CEMP) as a technical appendix to the Environmental Impact Assessment. The following points need to be considered in that plan:

- Implementation of the CTMP
- Specification of working hours that explicitly excludes overnight working
- No overnight floodlighting of working areas that impact visual receptors
- No overnight generators that impact noise receptors
- Limits on the amount of noise nuisance that the construction creates
- Limits on the amount of dust nuisance that the construction creates
- Damage to roads, including potholes, must be rectified quickly
- Time constraint on how long trenches will remain open
- Indication on when temporary roads will be removed
- Will the developer commit to a local point of contact for two-way communication regarding construction and environmental issues?

The construction activity at Eastern Green Link 2, near Peterhead, where there are a large number of temporary office buildings, has lighting which dazzles road users on the A90. The light pollution is visible from many miles away. Outdoor lighting must only be directed onto the surface to be illuminated; streetlamps are a good example.

20 Other Environmental Issues to be Scoped Out

20.1 Scoping Report question 20.2.10

The Community Council agrees with the proposed approach to scope out a dedicated major accident or disasters chapter from the EIA Report.

20.2 Scoping Report question 20.3.12

The Community Council agrees with the proposed approach to scope out a dedicated waste chapter from the EIA Report.

20.3 Scoping Report question 20.4.9

The Community Council DOES NOT agree with the proposed approach to scope out a dedicated human health and electromagnetic fields chapter from the EIA Report. Several scientific studies have reported links between extremely low frequency based magnetic fields due to high voltage transmission lines and substations and drastic influences for the human health. (Kayhan Ates, 2016), (K. ATES, 2018) . Local health boards are designated as key agencies under Scottish planning legislation, meaning they have statutory responsibilities for specific topic areas that can impact planning decisions, particularly those affecting public health and community wellbeing; the health boards should be consulted on the impact of electromagnetic fields.

21 Summary of EIA Scoping and Next Steps

Generally, ‘scoping out’ means to look carefully to see if something is interesting. However, in this context it appears to mean excluding something from the scope of the Environmental Impact Assessment. This implies that anything not yet considered, e.g. release of Radon gas, is automatically included.

The following items from Scoping Report table 21-2 must not be scoped out.

Topic and Potential Impact	Justification for not scoping out
Construction/decommissioning related killing/injury of fish and freshwater pearl mussel (FWPM)	If construction work allows sediment runoff to pollute the burns, then this may lead to killing of fish and other amphibians.
Operational impacts on habitats of low ornithological value.	Heron that feed along the Elsieck Burn are protected under the Wildlife and Countryside Act 1981. If construction work allows sediment runoff

	to pollute the burn, then this may lead to loss of feeding grounds.
Decommissioning impacts in relation to the Onshore Transmission Cables	Please refer to section 25 Decommissioning .
Potential impacts on the setting of assets from the construction, operation and decommissioning arising from the Onshore Transmission Cables	Please refer to section 9.1 St. Ternan's church
Contamination of soils during construction, operation and decommissioning.	Please refer to section 16 Land Use and Agriculture
Increase in Flood Risk across the Proposed Development during all phases	Please refer to section 0 Hydrology and Flood Risk
Potential impacts (of changes in traffic flows) on local roads and the users of those roads during Operation and Maintenance and Decommissioning phases.	Please refer to section 25 Decommissioning .
Potential impacts (of changes in traffic flows) on land uses and environmental resources fronting these roads, including the relevant occupiers and users during operation and maintenance and decommissioning phases.	There is a need for a traffic management plan as many roads are narrow or single track. Please refer to section 12 Traffic and Transport
Construction phase related noise - General Activities along the Onshore Transmission Cable Corridor	Please refer to section 14 Noise and Vibration
Construction phase related vibration	Please refer to Section 14 Noise and Vibration
Overall impact on Health and Wellbeing during Construction phase	Please refer to Section 18 Health and Wellbeing

22 Approach to Scoping and EIA

The Community Council agrees with the approach to scoping described in Scoping Report Chapter 4, especially with regard to the assessment of significant effects. Understanding the magnitude of impact and assigning the significance of known effects will inform the CEMP of the best mitigation measures to be taken.

23 Proposed Structure of the EIA Report

The EIA Technical Appendices should include a Construction Traffic Management Plan (CTMP).

24 Risks

This is a very large project and, consequently the risks can be significant. The following topics should be considered for inclusion in the EIA Report:

24.1 Grid connection

- The proposed Hurlie substation is still to receive planning permission. What will be the impact on the Aspen Project if the Hurlie substation is not completed or is late being completed?

24.2 Contractors

- What action can be taken if contractors and suppliers fail to adhere to the terms of the CEMP and the CTMP?
- What action can be taken if contractors and suppliers fail to adhere to the terms of planning conditions?
- Will funds be held in Escrow to ensure that all construction work will be completed?

24.3 General

- The water table may rise, exacerbating potential flood risks, especially on the A92
- Failure to prevent contamination of water courses creating conditions where burns become blocked and wildlife is killed
- Excessive noise creating nuisance and loss of amenity for local residents
- Excessive dust creating nuisance and loss of amenity for local residents
- Trenches remaining open for excessive periods leading to loss of amenity and greenspace for local residents
- What guarantees can you provide that roads will be repaired and returned to pre-construction conditions?
- What guarantees can you provide that agricultural land, and greenspaces will be returned to pre-construction conditions?

25 Decommissioning

Scoping Report table 18.2 states that it is assumed the Onshore Transmission Cables would be left in situ once disconnected and sealed during the decommissioning phase. This does not sit well with Scotland's commitment to a circular economy and waste reduction policies. It should be anticipated that future legislation may require transmission cables to be recovered for recycling.

26 Summary

This document has addressed a number of issues that were not covered by the Scoping Report or were earmarked for being scoped out of the proposed EIA Report. The Community Council has used knowledge of local conditions within the community council area to highlight concerns raised by our local communities about the Aspen Onshore Project. As a result, this report specifies a number of items to be included in the proposed EIA Report.

Of primary concern is the lack of a bedrock depth survey (see [Site Selection and Consideration of Alternatives](#)). Local knowledge leads us to believe that trench excavation for transmission cables and joint bays will require rock breaking. If this is the case, then that will significantly change the operation to install the Onshore Transmission Cables; timescales will increase dramatically, as will the amount of noise and dust created. All of these will have a negative impact on health and wellbeing within our communities.

Noise assessment along the Onshore Transmission Cable Corridor for trenching and backfill, must not be scoped out. Additional noise baseline recordings will be required along the northern perimeter of Skateraw and Newtonhill (from the sea to the A92), between Newtonhill and Chapelton, and to the west of Muchalls. Residents living in these locations fall into the category of Noise Sensitive Receptors and their health and wellbeing may suffer from undue noise and vibration.

The corridor shown in Scoping Report figure 1.2 (Aspen Offshore Wind Farm Onshore Transmission Connection) is not acceptable to our community. It is unreasonable to route the cables directly to the north and to the west of Newtonhill, there are also unacceptable impacts on Cammachmore, Chapelton and

Muchalls, including St. Ternan's church (Scoping Report asset 160) which is in the middle of the scoping corridor.

LDP Policy and NPF4 Policy support the argument against the cable corridor linked to the proposed landfall at Craig Stirling. A corridor roughly North by East from Hurlie to the coast, thus avoiding built-up areas, makes much more sense. This will also avoid approximately five kilometres of cutting trenches; with 9 trenches in parallel across the width of the corridor. This would amount to the saving of 45 kilometres of cutting trenches, potentially through bedrock.

It is unreasonable to route the cable corridor, with its associated loss of amenity and negative impact on wellbeing, so close to the homes of well over 3,000 residents, when there is an abundance of open countryside between Muchalls and Stonehaven that would be better suited as an alternative route.