



18th July 2025

Aberdeenshire Council Planning Department

Infrastructure Services

Viewmount,
Arduathie Road
Stonehaven,
AB39 2DQ

Dear Sir/Madam,

Re: Continued Objection to Planning Application – Hurlie 400 kV Substation

On behalf of Crathes, Drumoak and Durris Community Council, we write to reaffirm our strong objection to the proposed Hurlie 400 kV substation application, in line with our previous correspondence. We have carefully reviewed the revised Planning Statement submitted by SSEN in April 2025, together with its supporting documents, and remain of the view that the application fails to adequately address the significant concerns raised by our community and other stakeholders.

While we note the applicant has made some revisions, including updated references, additional landscape mitigation proposals, and a reframed narrative around heritage and visual impacts, we do not believe these amendments go far enough to rectify the substantial flaws inherent in the original application. In particular, the following issues remain unresolved:

- **Lack of Alternative Site Assessment:** The application continues to offer no credible evidence of a comprehensive assessment of alternative sites, in direct conflict with the LDP Policy R2, which clearly prioritises brownfield land over greenfield development.
- **Unmitigated Landscape and Visual Impacts:** Despite expanded narrative on landscape mitigation, the visual impact of this development—both on the local area and from key viewpoints—remains excessive and incompatible with LDP Policy E2 (Landscape). The addition of further buildings and infrastructure only exacerbates this issue.
- **Inadequate Heritage Impact Assessment:** The revised application still fails to provide satisfactory evidence to address the setting impacts on nearby heritage assets, contrary to LDP Policy HE1 (Protected Sites and Monuments). The superficial treatment of heritage concerns is wholly unacceptable.
- **Traffic and Access Concerns Unresolved:** There is still no clear resolution of the substantial increase in traffic volumes during construction and operational phases, nor a satisfactory explanation of the impacts on local rural roads and residential amenity.
- **Absence of Carbon Lifecycle Analysis:** Given the national emphasis on climate targets, the continued omission of a full carbon lifecycle assessment is a glaring omission which undermines claims of alignment with National Planning Framework 4 (NPF4) objectives.
- **Questionable Biodiversity Claims:** Assertions of biodiversity net gain are not backed by robust ecological assessments or credible enhancement proposals.



Our Community Council, reflecting the views of our local residents, believes these outstanding issues represent material conflicts with both national and local planning policy. The updated application does not provide the necessary assurances or evidence to justify the irreversible landscape, environmental, and community impacts this development would impose.

We urge Aberdeenshire Council to robustly defend the integrity of its planning policies and reject this application unless and until the fundamental issues raised are properly and transparently addressed.

Kind regards,

David Edgar

Chair

Crathes, Drumoak and Durriss Community Council