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Your Ref: ECU00003433

Ask for: James Hewitt  
Tel: 01467 533055  
Email: [james.hewitt@aberdeenshire.gov.uk](mailto:james.hewitt@aberdeenshire.gov.uk)

Scottish Government  
4th Floor  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

11 July 2025

Dear Sir/Madam

**Notification under Electricity Act 1989 for Consultation under Section 36 for  
Erection of Low Carbon Electricity Generating Comprising a High Efficiency  
Combined Cycle Gas Turbine (CCGT) Unit, Carbon Capture Plant, Works to Existing  
Cooling Water, Natural Gas and Electrical Grid Connections, Other Ancillary and  
Associated Works at Land At Peterhead Power Station, Boddam, Aberdeenshire**

I write in response to your consultation (03 June 2025) in respect of additional information for the above proposal.

The consultation request relates to the contents of additional information. Therefore, consideration is given solely to the additional information, and whether this would result in a material change to the position of Aberdeenshire Council (as per the Councils response of 30 June 2023).

Background

The additional information follows the Supreme Court decision R (Finch) -v- Surrey County Council, which concerned the scope of emissions to be considered as part of the EIA process. The applicant has therefore submitted additional information to update the Climate Change Chapter of the EIA Report, to include Scope 3 Emissions.

Greenhouse Gas (GHG) emissions can be classified into three categories, known as 'Scopes'. Scope 1 and 2 emissions are those directly and indirectly associated with a proposal, from sources owned or controlled by the operator. Scope 3 emissions are all other indirect emissions (outwith Scope 2) associated with a development. The purpose of the additional information is to consider the effect of Scope 3 emissions, with Scopes 1 and 2 previously considered. The result of the inclusion of Scope 3 emissions is to increase the overall emissions associated with the proposed development.

The additional information reiterates the intention that the development shall only operate with the benefit of Carbon Capture and Storage (CCS), particularly the ACORN project at St Fergus. The Planning Service notes this intention but would advise that the CCS project at St Fergus does not have planning permission and is not currently subject to a planning application. Therefore, there is significant uncertainty attached to the delivery of this part of the mitigation for Peterhead CCGT.

In a Planning context this impacts the assessment of the development under NPF4 Policy 1 'Tackling the Climate and Nature Crises', which requires significant weight to be attached to climate change (and the nature crisis). The mechanism through which this weight is to be applied would be the 'Planning Balance'. The Planning Balance refers to the process whereby the benefits of a scheme are considered against adverse impacts (of the project as a whole). This is ultimately an exercise to be undertaken by the decision maker.

### Conclusion

The Planning Service conclude that the additional information does not materially change the previous response (**No Objection**) to this proposal. The consideration of Scope 3 emissions results in an overall greater environmental impact (in relation to GHG emissions), but the acceptability of this increase is for the decision maker to consider as part of the Planning Balance.

The mitigation offered as part of this application in respect of CCS must be treated with caution. As the ACORN project does not currently have planning permission and is not subject to a planning application, no degree of certainty can be offered as to the implementation of this mitigation. As such the decision maker should consider the use of a Grampian Style Planning condition, which prevents operation of the proposed development until the CCS is in place.

I would reiterate that this response must be read in conjunction with the previous response from the Council.

I trust this response is clear. Should you have any queries, please contact the officer named at the head of this letter.

Yours faithfully  
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Head of Planning and Economy