

SSE THERMAL GENERATION (SCOTLAND) LIMITED PETERHEAD LOW CARBON CCGT POWER STATION PROJECT

Pre-Application Consultation (PAC) Report



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PETERHEAD LOW CARBON CCGT POWER STATION PROJECT

Pre-Application Consultation (PAC) Report

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GLOSSARY

Abbreviation	Description
1989 Act	Scottish Ministers under Section 36 of 'The Electricity Act 1989
2013 Regulations	The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013
Applicant	SSE Thermal Generation (Scotland) Limited
CCGT	Carbon Combined Cycle Gas Turbine
CCP	Carbon Capture Plant
CCS	Carbon Capture Storage
CCUS	Carbon Capture, Usage and Storage
CO ₂	Carbon Dioxide
COVID-19	Coronavirus
EIA	Environmental Impact Assessment
LPA	Local Planning Authority
MW	Megawatts
NPF	National Planning Framework (NPF)
PAC	Pre-Application Consultation (PAC)
PAN	Proposal of Application Notice
Proposed Development	Low carbon combined cycle gas turbine generating station with a capacity of up to 910 megawatts gross electrical capacity, including post-combustion carbon capture plant and works to the existing cooling water, natural gas and electrical grid connections.
SEP	Stakeholder Engagement Strategy
Site	Land at and in the vicinity of the existing Peterhead Power Station Site near Boddam in Aberdeenshire
SP=EED	Successful Planning = Effective Engagement and Delivery
TCP(S)A 1997	The Town and Country Planning (Scotland) Act 1997

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1. Summary

- 1.1.1. This Pre-Application Consultation (PAC) Report has been prepared on behalf of SSE Thermal Generation (Scotland) Limited (the 'Applicant'). It forms part of the application (the 'Application') that has been submitted seeking consent for the Peterhead Low Carbon Combined Cycle Gas Turbine (CCGT) Project from the Scottish Ministers under Section 36 of 'The Electricity Act 1989' (the '1989 Act') and a direction deeming planning permission to be granted under Section 57(2) of 'The Town and Country Planning (Scotland) Act 1997' (the 'TCP(S)A 1997').
- 1.1.2. The Applicants are seeking consent for the construction and operation of a low carbon combined cycle gas turbine generating station with a capacity of up to 910 megawatts gross electrical capacity, including post-combustion carbon capture plant and works to the existing cooling water, natural gas and electrical grid connections (the 'Proposed Development') on land at and in the vicinity of the existing Peterhead Power Station Site near Boddam in Aberdeenshire (the 'Site').
- 1.1.3. There is no statutory requirement to undertake pre-application consultation in respect of applications for consent under Section 36 of the 1989 Act. However, in view of the National Development status of the Site in National Planning Framework (NPF) 3 (and draft NPF4), the Applicant took the decision to carry out pre-application consultation in respect of the Proposed Development.
- 1.1.4. The Applicant's approach to the pre-application consultation on the Proposed Development has broadly mirrored the requirements of the TCP(S)A 1997 and 'The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013' (the '2013 Regulations')
- 1.1.5. In preparing the Stakeholder Engagement Strategy (SEP) for the Proposed Development, the Applicant has had regard to the TCP(S)A 1997 and the 2013 Regulations in addition to Aberdeenshire Council's published planning advice on pre-application consultation. The Proposal of Application Notice (PAN) submitted to the Council (and relevant community councils) on 13th July 2021 was accompanied by a copy of the SEP. Neither Aberdeenshire Council nor the community councils raised any issues with regard to the proposals for pre-application consultation set out in the PAN submission.
- 1.1.6. The Applicant has undertaken two stages of pre-application consultation on the Proposed Development – Stage 1 and Stage 2.
- 1.1.7. The Stage 1 Consultation was carried out between 10th May 2021 and 7th June 2021 and was used to introduce the Proposed Development and emerging proposals to the local community and other stakeholders. The primary objectives of Stage 1 were to:
- engage with local political representatives, the relevant community councils, wider political stakeholders and the local community to introduce the proposals;
 - provide stakeholders with information on carbon capture and storage (CCS) technology;
 - make stakeholders aware of the proposals and inform them that any potential impacts are being robustly and thoroughly assessed; and
 - provide stakeholders with the opportunity to ask initial questions and provide comments and feedback, which could be used to inform the Stage 2 Consultation on the more detailed proposals.
- 1.1.8. The Stage 2 Consultation ran from 23rd August to 1st October 2021. The Stage 2 Consultation provided an update on the proposals and provided stakeholders with more detail on them, which was

by the design, technical and environmental work undertaken since Stage 1. The primary objectives of the Stage 2 Consultation were to:

- provide a summary of the comments/feedback received to Stage 1;
- provide an update on the Proposed Development, the further work undertaken since Stage 1 and any changes that had been made;
- provide an overview of the Environmental Impact Assessment (EIA) work being undertaken and the key environmental topics and issues; and
- provide stakeholders with the opportunity to engage with the Project Team, ask questions and provide comments/feedback on the more developed proposals.

1.1.9. The pre-application consultation took place during the COVID-19 pandemic. Due to the restrictions in place at the time it was not possible for the Applicant to hold face-to-face public consultation events at Stage 1. The Applicant therefore deployed a range of consultation methods to enable stakeholders to engage. These included a newsletter that was sent to residents and businesses within the 5km Consultation Area, newspaper notices, the use of a virtual exhibition venue and making information available on the project website. People were able to submit comments using a comments form attached to the newsletter, an online version and also to get in touch by Freepost, Freephone and email.

1.1.10. At Stage 2, the Applicant deployed the same range of consultation methods but also held two face-to-face public consultation events as COVID-19 restrictions had been eased. A total of 18 people attended the consultation events over the two days.

1.1.11. A total of 41 responses were received to Stage 1, with 67 responses received to Stage 2. The majority of comments and feedback received to both stages of consultation was positive. The main topics/themes raised reducing carbon emissions in order to meet legally binding targets of achieving net zero in terms of greenhouse gas emissions; the use of CCS/CCUS technology; employment; local/community benefits; and the assessment of environmental effects. The Applicant has had regard to the comments and feedback received to the pre-application consultation and following the Stage 2 consultation issued a response to the main topics/themes raised in order to provide feedback in advance of this PAC Report being produced and the submission of the Application.

1.1.12. In conclusion, it is considered that the Applicant has carried out comprehensive and meaningful pre-application consultation in respect of the Proposed Development in advance of submitting the Application to the Scottish Ministers.

2. Introduction

2.1. OVERVIEW

- 2.1.1. This Pre-Application Consultation (PAC) Report has been prepared on behalf of SSE Thermal Generation (Scotland) Limited (the 'Applicant'). It forms part of the application (the 'Application') that has been submitted seeking consent for the Peterhead Low Carbon Combined Cycle Gas Turbine (CCGT) Project from the Scottish Ministers under Section 36 of 'The Electricity Act 1989' (the '1989 Act') and a direction deeming planning permission to be granted under Section 57(2) of 'The Town and Country Planning (Scotland) Act 1997' (the 'TCP(S)A 1997').
- 2.1.2. The Applicants are seeking consent for the construction and operation of a low carbon combined cycle gas turbine (CCGT) generating station with a capacity of up to 910 megawatts (MW) gross electrical capacity, including post-combustion carbon capture plant and works to the existing cooling water, natural gas and electrical grid connections (the 'Proposed Development') on land at and in the vicinity of the existing Peterhead Power Station Site near Boddam in Aberdeenshire (the 'Site').
- 2.1.3. The carbon capture plant (CCP) will capture the CO₂ emissions generated through the combustion of natural gas in the CCGT, which will then be compressed and transported by a pipeline operated (and consented under a separate application) by the Acorn CCS Project for permanent storage under the North Sea.
- 2.1.4. The majority of the land to which the Application relates is within the control of the Applicant. This is with the exception of some of the land occupied by the existing cooling water infrastructure and also highway land where some works are proposed.

2.2. THE APPLICANT

- 2.2.1. The Applicant is part of the FTSE-listed SSE plc, one of the UK's largest and broadest-based energy companies, and the UK's leading generator of renewable energy. Over the last 20 years, the SSE Group has invested over £20 billion to deliver industry-leading offshore wind, onshore wind, CCGT, energy from-waste, biomass, energy networks, gas storage projects, and develop carbon capture & storage (CCS) projects. The Applicant owns and operates the existing Peterhead Power Station.
- 2.2.2. The Applicant is jointly developing the Peterhead Low Carbon CCGT project with Equinor UK Ltd. Equinor has been operating in the UK for over 35 years and is one of the country's leading energy providers, supplying natural gas, oil and electricity. Headquartered in Norway, the company aims to reach net zero emissions globally by 2050. In the UK, Equinor operates one offshore oil field and three offshore wind farms including Hywind Scotland, the world's first floating wind farm whose operations and maintenance base is located in Peterhead. Equinor is also a leader in CCS and hydrogen, developing the H2H Saltend hydrogen production plant at the heart of the Zero Carbon Humber alliance, and partnering in the Net Zero Teesside Project and the Northern Endurance Partnership.
- 2.2.3. SSE produced a 'Greenprint' document (SSE, 2020) that sets out a clear commitment to investment in low carbon power infrastructure, working with the UK government and other stakeholders to create a 'Net Zero' power system by 2040. This includes investment in flexible sources of electricity generation and storage for times of low renewable output which will complement other renewable generating sources, either using low-carbon fuels and/ or capturing and storing carbon emissions.

2.2.4. The design of the Proposed Development demonstrates this commitment. The Proposed Development will be built with a clear route to decarbonisation, being equipped with post-combustion carbon capture technology. This is consistent with SSE's commitment to reduce the carbon intensity of electricity generated by 60% by 2030, compared to 2018 levels.

2.3. WHAT IS CARBON CAPTURE, USAGE AND STORAGE

2.3.1. Carbon Capture, Usage and Storage (CCUS) is a process that removes CO₂ emissions at source, for example emissions from an electricity generating station or industrial installation, and then compresses the CO₂ so that it can be safely transported to secure underground storage sites. It is then injected into layer of solid rock filled with interconnected pores where the CO₂ becomes trapped and locked in place, preventing it from being released into the atmosphere. There is also the potential for some of the captured CO₂ to be used in certain industrial and manufacturing processes. **Figure 2.1** below shows what is involved in the process.

Figure 2.1 – Diagram of Carbon Capture, Usage and Storage Process



2.4. THE PROPOSED DEVELOPMENT

2.4.1. The Proposed Development comprises the construction and operation of a low carbon CCGT generating station with a capacity of up to 910 MW electrical output and ancillary development.

2.4.2. The Proposed Development Site (the 'Site') lies entirely within the administrative area of Aberdeenshire Council and extends to approximately 89ha. It is located just to the north-west of the village of Boddam (30m) and south of the town of Peterhead (1.5km). It is accessed from the A90 from Gatehouse Road. The A90 runs from Aberdeen in the south along the coast to Fraserburgh in the north.

2.4.3. The bulk of the Site is situated to the east of the A90 and lies within the boundary – and to the north west – of the existing Peterhead Power Station site, although part of it extends west across the A90.

- 2.4.4. The surrounding area is predominantly rural in character, comprising pasture and arable land with some areas of woodland.
- 2.4.5. The nearest residential area is Boddam to the south. This is approximately 800m from the proposed location of the CCGT generating station and its CCP.
- 2.4.6. The low carbon CCGT generating station will be fuelled by natural gas and include a post-combustion carbon capture plant (CCP) and works to the existing cooling water, natural gas and electrical grid connections at the existing Power Station site. The CCP will capture and compress the carbon dioxide (CO₂) emissions from the generating station. It is proposed that the generating station will connect into the Acorn Carbon Capture and Storage (CCS) Project for the transportation and permanent storage of the captured CO₂.
- 2.4.7. The Acorn CCS Project is being led by Storegga with their partners Harbour Energy and Shell. The Acorn Project will include a gathering network to collect CO₂ from a number of emitters. The CO₂ will be transported to the St. Fergus Gas Terminal from where it will be transported offshore using existing pipelines (the Miller and Goldeneye pipelines) for storage within the Acorn storage site below the Central North Sea. The Acorn Project is not included within the Application and will be the subject to a separate planning application and offshore consents applications.
- 2.4.8. The existing Peterhead Power Station's capacity will be reduced from 1,180 MW to around 300 MW and will remain available to operate alongside the new low carbon CCGT generating station. However, the existing Power Station is only expected to operate if grid demand cannot be fulfilled by the new generating station. It should be noted that the existing Power Station will not need to be decommissioned or demolished to allow the Proposed Development to be constructed and operated, although some ancillary structures, which are no longer required, will need to be removed to provide the necessary space.
- 2.4.9. Chapter 3 'Site and Surrounding Area' and Chapter 4 'Proposed Development' of the EIA Report provide a more detailed description of the Site and the Proposed Development.

2.5. LEGISLATION AND GUIDANCE

- 2.5.1. The Proposed Development comprises an electricity generating station with a gross electrical output in excess of 50 MW, which means that consent to construct and operate the generating station must be obtained from the Scottish Ministers under Section 36 of the 1989 Act.
- 2.5.2. When granting consent under Section 36 of the 1989 Act, the Scottish Ministers may also give a direction that planning permission be deemed to be granted, under Section 57(2) the TCP(S)A 1997.
- 2.5.3. The Application seeks consent for the generating station under Section 36 of the 1989 Act and also deemed planning permission under Section 57(2) of the TCP(S)A 1997 for the generating station and ancillary development.
- 2.5.4. The determination of applications under Section 36 is primarily a matter of energy and climate change policy. However, other matters that may be relevant to the determination of a Section 36 application (particularly in the context of whether to deem planning permission to be granted under Section 57(2) of the 1997 Act) include statements of planning policy and the development plan.
- 2.5.5. There is no statutory requirement to undertake pre-application consultation in respect of applications for consent under Section 36 of the 1989 Act.
- 2.5.6. Section 35A to 35C of the TCP(S)A 1997 set out the requirements for pre-application consultation in respect of applications for planning permission (planning applications).

2.5.7. Regulation 4 of 'The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013' (the '2013 Regulations') confirms that pre-application consultation should be undertaken for certain classes of development, which include 'National' and 'Major' developments.

2.5.8. The Site is identified in National Planning Framework (NPF) 3 (June 2014) as part of 'National Development 3' for a "CCS Network and Thermal Generation" at Peterhead. The National Development status of the Site has been carried forward into draft NPF4 (November 2021).

2.5.9. In view of the National Development status of the Site, the Applicant took the decision to carry out pre-application consultation in respect of the Proposed Development.

2.5.10. Section 35B(4) of the TCP(S)A 1997 states that least 12 weeks before a planning application is submitted, the application must give notice – a proposal of application notice or 'PAN' – to the relevant local planning authority (LPA) providing details relating to the proposed development. Regulation 6 of the 2013 Regulations confirms that the PAN must:

"... in addition to those matters required by section 35B(4) of the Act, also contain an account of what consultation the applicant intends to undertake, when such consultation is to take place, with whom and what form it will take."

2.5.11. Regulation 7 of the 2013 Regulations sets out the requirements for the pre-application consultation. This includes the following:

- To consult every community council whose area is within or adjoins the land to which the proposed development relates.
- To hold at least one public event where members of the public may make comments to the applicant about the proposed development.
- To publish in a local newspaper circulating in the locality in which the proposed development is situated a notice containing a description of, and the location of, the proposed development; details as to where further information may be obtained concerning the proposed development; the date and place of the public event; a statement explaining how, and by when, persons wishing to make comments to the applicant relating to the proposed development may do so.
- Not to hold the public event earlier than 7 days after notification of the date and place of the event in the local newspaper.

2.5.12. Section 35C of the TCP(S)A 1997 states that before submitting a planning permission the applicant must prepare a pre-application consultation report as to what has been done to comply with the Act and 2013 Regulations.

2.5.13. In carrying out the pre-application consultation for the Proposed Development, the Applicant has had regard to the requirements relating to pre-application consultation for planning applications set out in the TCP(S)A 1997 and the 2013 Regulations.

2.5.14. The Applicant has also had regard to Aberdeenshire Council's published planning advice on pre-application consultation 'Planning Advice, SP=EED (Successful Planning = Effective Engagement and Delivery)' published in January 2018. The advice is compliant with the principles of the 2013 Regulations and takes account of Scottish Planning Policy.

2.5.15. Paragraph 1.4 of the Planning Advice states that it may be applied where voluntary pre-application consultation is being undertaken. Paragraphs 5.6 to 5.8 provide guidance on pre-application consultation in respect of National and Major developments.

2.6. THE PURPOSE AND STRUCTURE OF THIS DOCUMENT

2.6.1. The purpose of this PAC Report is to set out the pre-application consultation undertaken by the Applicant in advance of the submission of the Application to the Scottish Ministers.

2.6.2. The PAC Report is structured as follows:

- **Section 3: Overview of Pre-application Consultation** – provides an overview of the pre-application consultation undertaken by the Applicant.
- **Section 4: Stakeholder Engagement Plan** – provides an outline of the Stakeholder Engagement Plan that was developed to guide the pre-application consultation.
- **Section 5: Stage 1 Consultation** – sets out what was done for the initial (Stage 1) consultation on the emerging proposals for the Proposed Development.
- **Section 6: Proposal of Application Notice (PAN)** – describes the information that was provided to Aberdeenshire Council with the PAN in advance of undertaking the Stage 2 Consultation on the Proposed Development.
- **Section 7: Stage 2 Consultation** – sets out what was done by the Applicant for the Stage 2 Consultation on the more developed proposals for the Site.
- **Section 8: Applicant's Response to Consultation** – details the Applicant's response to the comments and feedback received in response to the two stages of consultation.
- **Section 9: Summary and Conclusions** – sets out the summary and conclusions of the PAC Report.

2.6.3. The Applicant's pre-application consultation was undertaken during the COVID-19 (Coronavirus) pandemic while a number of public health measures and restrictions were in place. As a result, it was not always possible to hold face-to-face consultation events and therefore the Applicant deployed a number of consultation methods in order to ensure that people still had the opportunity to comment on the proposals

3. Overview of Pre-Application Consultation

3.1.1. This section provides an overview of the pre-application consultation undertaken by the Applicant in respect of the Proposed Development.

3.1.2. The Applicant adopted a two-stage approach to pre-application consultation as follows:

- Stage 1 Consultation (May – June 2021) – this initial consultation served as an introduction to the Proposed Development for the local community and other stakeholders and provided information on the emerging proposals.
- Stage 2 Consultation (August – October 2021) – the Stage 2 consultation provided information on the Applicant’s more developed proposals for the Site taking account of further design work and environmental assessments taking place.

3.1.3. At both stages of consultation, members of the local community were encouraged to complete feedback forms either online or via freepost.

3.1.4. Although not a requirement for applications seeking consent under Section 36 of the 1989 Act, the Applicant submitted a ‘Proposal of Application Notice’ (PAN) to Aberdeenshire Council on 13th July 2021. The PAN set out the Applicant’s proposed approach to consultation for the Proposed Development and was accompanied by a copy of the Applicant’s Stakeholder Engagement Plan.

3.1.5. **Table 3.1** below summarises the above stages of consultation along with any other pre-application consultation undertaken:

Table 3.1 – Pre-application consultation

Consultation activity	Details	Steps undertaken by the Applicant
Pre-application Meetings	April/May 2021	<ul style="list-style-type: none"> • Initial pre-application meetings took place with Aberdeenshire Council and the relevant community councils. The meetings consisted of an introductory presentation, which was delivered by the Applicant and Project Team. • The presentation provided an overview of the Proposed Development following which there was an opportunity for council members to ask questions and discuss particular issues with the Applicant and Project Team. • The following meetings took place: <ul style="list-style-type: none"> – 14th April 2020 – Aberdeenshire Council – 20th April 2021 – Cruden Community Council – 5th May 2021 – Boddam Community Council – 19th May 2021 – Peterhead Community Council

Consultation activity	Details	Steps undertaken by the Applicant
Initial Consultation and Stakeholder Engagement Plan	Initial draft April 2021 / Final version July 2021	<ul style="list-style-type: none"> The Applicant produced a document setting out the steps and methods to be utilised to consult the local community and key stakeholders on the Proposed Development. This included the proposed consultation methods which were to be included in the Stakeholder Engagement Plan (SEP). These were outlined at the pre-application meetings and consulted on with Aberdeenshire Council. See Section 3 of the PAC Report for more information.
Stage 1 Consultation	10 th May to 7 th June 2021	<ul style="list-style-type: none"> Introductory consultation with the local community and key stakeholders within the vicinity of the Site. See Section 4 of this PAC Report for more information on the Stage 1 Consultation.
Proposal of Application Notice (PAN)	13 th July 2021	<ul style="list-style-type: none"> Submission of Proposal of Application Notice (PAN) to Aberdeenshire Council and the relevant community councils at least 12 weeks prior to the submission of the application, thereby mirroring the requirement of Section 35B(4) of the TCP(S) Act 1997 and Regulation 6 of the 2013 Regulations. The PAN described the Proposed Development, its location and also set out what consultation the Applicant was proposing to undertake. See Section 5 of this PAC Report for more information on the PAN.
Stage 2 Consultation	23 rd August to 3 rd October 2021	<ul style="list-style-type: none"> Consultation with the local community and key stakeholders within the vicinity of the Site on the Applicant's more developed proposals taking account of the design and environmental assessment work undertaken and providing an opportunity for the submission of comments and feedback. See Section 6 of this PAC Report for more information on the Stage 2 Consultation.

4. Stakeholder Engagement Plan

4.1.1. On 12th April 2021, the Applicant consulted Aberdeenshire Council on its 'Initial Stakeholder Engagement Plan' (SEP). The document set out the Applicant's objectives for the pre-application consultation; identified key stakeholders (including MSPs, ward councillors and the relevant community councils) to be consulted on the Proposed Development and set out proposed methods of consultation.

4.1.2. The Initial SEP established the principles and objectives behind the Applicant's consultation approach, which were:

- To create positive, informative and open channels of communication between local residents and businesses, local political representatives and the media and generate local support for the proposals.
- To provide a robust, accessible and meaningful consultation around the future plans for the Site, giving stakeholders the opportunity to have their views heard and be taken into account where possible.
- To protect and grow SSE Thermal's reputation in the area and uphold a commitment to being a responsible developer, constructor, owner and operator of energy infrastructure.
- To build and maintain positive relationships with all neighbours and key stakeholders.

4.1.3. The Initial SEP proposed a 5km consultation radius from the Site which was to form the basis of the Consultation Area for the pre-application consultation. This area covered the relevant community council areas and was considered to be the area within which there was potential for people to be most directly affected by and interested in the Proposed Development. The Consultation Area is shown below at **Figure 4.1**.

Figure 4.1 - Consultation Area



4.1.4. The Initial SEP also made reference to details of the next steps following the end of the pre-application consultation. It confirmed that a Pre-Application Consultation (PAC) Report would be prepared to detail the pre-application consultation undertaken and set out the comments and feedback received.

- 4.1.5. A pre-application meeting was held on 14th April 2021 between the Applicant and Aberdeenshire Council. The meeting consisted of a presentation which described at a high level the consultation methods set out in the Initial SEP. The consultation methods were presented with an added emphasis on their ability to adequately function virtually/remotely due to the ongoing COVID-19 pandemic. The Applicant received verbal agreement from Council officers at the meeting, that its proposed pre-application consultation approach was acceptable.
- 4.1.6. Meetings were also held with Boddam and District Community Council, Cruden Community Council and Peterhead Community Council, where the consultation methods were discussed. The Initial SEP was also issued to all the community councils below for comment prior to the start of the Stage 1 Consultation:
- Boddam and District Community Council.
 - Cruden Community Council.
 - Peterhead Community Council.
 - Buchan East Community Council.
 - Longside and District Community Council.
- 4.1.7. No written feedback was received from Aberdeenshire Council or the community councils with regard to the Initial SEP.
- 4.1.8. In preparing the Initial SEP the Applicant and its Project Team has regard to the requirements of Sections 35A to 35C of the TCP(S) 1997 Act, the 2013 Regulations, Planning Circular 03/2013 'Development Management Procedures' and Aberdeenshire Council's Aberdeenshire Council's published planning advice on pre-application consultation 'Planning Advice, SP=EED (Successful Planning = Effective Engagement and Delivery)' published in January 2018.
- 4.1.9. It should also be noted that the Applicant's pre-application consultation, as set out in the SEP, ensured compliance with the Scottish Government Guidance: 'Coronavirus (COVID-19): planning guidance on pre-application consultations for public events'.
- 4.1.10. As a result of the COVID-19 pandemic, the final SEP set out a number of consultation methods in order to ensure that people still had the opportunity to comments on the proposals. It also took account of 'The Town and Country Planning (Miscellaneous Temporary Modification) (Coronavirus) (Scotland) Regulations 2020'.
- 4.1.11. The final SEP was issued with the PAN to Aberdeenshire Council and the community councils on 13th July 2021.

5. Stage 1 Consultation

5.1. INTRODUCTION

5.1.1. This section provides an overview of the Stage 1 Consultation for the Proposed Development, including a summary and analysis of the feedback received from the local community.

5.1.2. The Stage 1 Consultation was carried out between 10th May 2021 and 7th June 2021. The primary objectives of the Stage 1 Consultation were to introduce the Proposed Development to the local community and key stakeholders. The primary objectives of the Stage 1 were to:

- engage with local political representatives, the relevant community councils, wider political stakeholders and the local community to introduce the proposals;
- provide stakeholders with information on Carbon Capture and Storage (CCS) technology;
- make stakeholders aware of the proposals and inform them that any potential impacts are being robustly and thoroughly assessed; and
- provide stakeholders with the opportunity to ask initial questions and provide comments and feedback, which could be used to inform the Stage 2 Consultation on the more detailed proposals.

5.2. WHO WAS CONSULTED?

5.2.1. At the beginning of the consultation period, a newsletter (which included a comments/feedback form and details of a freepost address) was posted to every residential and business address within the 5km Consultation Area, including to the towns of Boddam and Peterhead. This provided information on the Stage 1 Consultation.

5.2.2. Meetings were held with the local community councils prior to and early in the Stage 1 Consultation period. The ward councillors listed in the SEP were also notified of the Stage 1 Consultation period at the outset.

5.2.3. Due to the COVID-19 restrictions in place in Scotland at the time of the Stage 1 Consultation, it was not considered feasible or safe to hold face-to-face public consultation events. So as to ensure that the local community and other key stakeholders were able to view the consultation information and make comments, several remote and virtual consultation methods were employed. These methods are described further below.

5.3. HOW WERE STAKEHOLDERS CONSULTED?

5.3.1. The key communication methods that were used during the Stage 1 Consultation included:

- A virtual exhibition space – stakeholders were encouraged to access a virtual exhibition space where information was provided via videos, banners, maps and drawings. Consultees could also download a copy of a Frequently Asked Questions (FAQs) document which had been prepared by the Applicant. A comments form was also provided for people to provide initial feedback and ask questions.
- A project website (www.ssethermal.com/flexible-generation/development/peterhead-carbon-capture) was utilised to provide a simplified web experience and alternative to the virtual exhibition space, which provided an introduction to the Proposed Development and a list of downloadable items such as the virtual exhibition banners, FAQs document and newsletter.

- A newsletter (including FAQs sheet and site plan) was delivered by post to all local residences and businesses within the Consultation Area. This involved the delivery of newsletters to approximately 10,000 residential properties and 500 business premises. The newsletter included information about the Applicant, an initial red line boundary for the Proposed Development area, information about the Proposed Development and CCS. People were invited to provide feedback through the comments form attached to the end of the newsletter, which included a freepost address.
- A half page newspaper advert was placed in the Buchan Observer (17th May 2021) and the Press and Journal (11th May 2021). The advert publicised the Stage 1 Consultation and encouraged the local community to access the virtual exhibition space and website, providing information on how to access the sites and confirming the deadline for the submission of comments.
- The newsletters, newspaper notices and virtual exhibition also provided details of a freephone line by through which people could speak to members of the Project Team directly during working hours (or leave messages outside of working hours) to ask questions/leave feedback.

5.3.2. In addition to the newsletter and accompanying comments form, people were also able to submit comments and feedback and ask questions via an email address (thermalenquiries@sse.com).

5.4. WHAT WERE STAKEHOLDERS CONSULTED ON/WHAT INFORMATION WAS PROVIDED?

5.4.1. The Stage 1 Consultation was intended to introduce the Proposed Development to the local community. The structure of the virtual exhibition space and website banners and the information that was provided on them is set out below:

- About SSE Thermal and Equinor.
- SSE at Peterhead.
- The Need for the Project and its Benefits.
- About the Project at Peterhead.
- What is Carbon Capture and Storage?
- Next Steps.
- Formal (Stage 2) Consultation.
- Indicative Programme.
- Comments Form.
- Find out more.

5.4.2. The newsletter issued to each of the residences and businesses provided a summarised version of the above list of topics, focussing in particular on introducing the Applicant, the Proposed Development, CCS, the next steps and how to make comments.

5.4.3. Copies of the banners, newsletter and newspaper advert are provided at **Appendix 5.1** of this PAC Report.

5.5. HOW COULD COMMENTS BE PROVIDED AND WHAT WAS THE DEADLINE TO DO SO?

5.5.1. Comments and feedback could be provided through the comments form, which was attached to the newsletter and also available via the virtual exhibition space and project website. A copy of the comments form that was used is provided at **Appendix 5.2**. Stakeholders were also able to submit their comments and feedback via the provided Freepost address, Freephone number or email address (thermalenquiries@sse.com). A deadline of Monday 7th June 2021 at 5pm for the submission of comments was stated on the newspaper notices, virtual exhibition space, project website and consultation materials.

5.6. RESPONSE TO THE CONSULTATION

5.6.1. A total of 34 feedback forms were received during the Stage 1 Consultation. The following section of this Report will provide an analysis of the topics/themes received in those responses, along with an overview of which methods participants chose to use in order to respond (i.e. virtual or physical forms).

5.6.2. In addition, a total of seven emails were received during the Stage 1 Consultation. Of these, five asked questions about the Proposed Development, which SSE considered and provided responses to prior to the close of the consultation period. The topics/themes raised in the questions received via email varied, including questions regarding the use of CCS technology, the environmental assessments underway and the previous CCS plans at the Site.

5.6.3. Two calls were made to the Freephone number, one of which requested copies of the Stage 1 Consultation documents be posted out to their address, with the other asked a number of general questions about the Proposed Development in the absence of internet access at their residence. Both enquiries received via the Freephone were responded to by the end of the consultation period.

Analysis of comments and feedback

5.6.4. The main topics/themes raised by stakeholder at Stage 1 were as follows:

- the principle of a Carbon Capture, Usage and Storage (CCUS) project;
- the use of CCUS technology;
- the continued use of fossil fuels;
- climate change; and
- employment and regeneration.

5.6.5. A number of the comments forms and emails also included general positive/supportive comments and observations with regard to the consultation and the information provided.

5.6.6. Individual analysis of the responses received to each question featured on the Stage 1 comments form is provided below.

Question 1 – Where did you find this comments form?

5.6.7. Question 1 asked respondents to confirm where they found the comments form. The majority of respondents (76%) said they received the comments form with the newsletter which was posted out to them at the beginning of the consultation. **Table 5.1** below provides a breakdown of how respondents received the comments forms – please note that in some instances respondents selected multiple answers.

Table 5.1 – How respondents received the Feedback Form

With the Newsletter	On the Project Website	In the Virtual Exhibition Space	Other
26	1	2	6

5.6.8. In terms of the respondents who answered “other”, only one confirmed how they received the comments form, stating “post”.

Question 2 – Where would you like to see more information about this Project in the future?

5.6.9. Question 2 asked where people would like to see more information on the Proposed Development going forward. The most popular methods selected were to receive information by further newsletters posted to addresses (50%) and updates via local newspapers (47%). In addition, 26% of respondents requested that information be made available via social media, such as Facebook. **Table 5.2** below provides a breakdown of the responses to Question 2.

Table 5.2 – Where people would like to see further information on the Project

In local newspapers	Via newsletter posted to my address	On social media i.e. Facebook
16	17	9

Question 3 – Please provide any initial thoughts or comments you have about the Project?

5.6.10. Question 3 asked people to set out their initial thoughts and comments regarding the proposals based on the information that had been made available to them during the consultation. Of the 34 comments forms received during the Stage 1 Consultation, 26 contained positive/supportive comments and feedback (i.e. 76% of responses). The responses received can be broadly categorised as follows:

Table 5.3 – Comment themes regarding initial thoughts expressed in response to Question 3

Positive	Neutral	Negative	N/A
26	1	3	4

Positive comments received in response to Question 3

5.6.11. The responses received regarding Question 3 of the newsletter were largely positive/supportive. The majority of stakeholders provided general supportive comments and words of encouragement in favour of the Proposed Development. Several respondents provided support for specific benefits of the proposals such as tackling climate change and generating employment opportunities. A breakdown of the positive/supportive comments received (including the topics/themes raised) is detailed in **Table 5.4** on the following page. The responses have been ranked in respect of their frequency of occurrence.

Table 5.4 – Positive comment topics/themes received in response to Question 3 (ranked by frequency)

Positive Topics/Themes	No.
General supportive comment	17
Further jobs coming to the area	7
Tackling climate change	5
Environmental benefits	5
Other kind of supportive comment	3

5.6.12. Table 5.5 below provides verbatim examples of comments which were received for each of the above listed positive response categories.

Table 5.5 – Examples of Positive Comments

Comment Type/Subject	Example comment
General Supportive Comments	<p><i>“This is a fantastic opportunity for Peterhead. The use of carbon capture technologies will allow the Peterhead plant to become one of the first in the world to develop and use this technology.”</i></p> <p><i>“It is a really good thing that is coming to Peterhead.”</i></p> <p><i>“Excellent proposal, groundbreaking and innovative.”</i></p> <p><i>“I think the project is long overdue and will go a long way to help us achieve our commitment to the 2050 date”.</i></p> <p><i>“10 years too late but good to see progress at last”.</i></p> <p><i>“Project has had so many false starts, it just needs to get going! Can the timeline be shortened? This is a KEY technology, and we need it yesterday. Good luck team!”</i></p>
Further jobs coming to the area	<i>“Great it provides jobs. It will help stop the greens driving us back to the stone age. Cheaper power doubt it...”</i>
Tackling climate change	<i>“Climate change is the biggest issue in the world at the moment and there is not much time to act before rising temperatures will become irreversible and cause so much damage to our world. Therefore, it's great to see that an energy firm and an oil & gas firm are attempting to do their part through the creation of this new project”.</i>
Environmental benefits	<i>“Good design, good project, good for the environment.”</i>

Comment Type/Subject	Example comment
	<i>This project will be a positive change from an environmental aspect and is what needs to happen. This project will also make Peterhead a place known for helping to benefit the environment.”</i>

Concerns received in response to Question 3

5.6.13. Of the comments received via the comments form to Question 3, three comments (8%) raised concern over the Proposed Development promoting the continued use of fossil fuels and whether it is the best use of resources when compared to the use of renewables. A further two of the responses (5%) raised issues regarding the use of CCUS technology, including the safety of CO₂ storage and potential leaking of CO₂ into the atmosphere. Finally, one other concern related to the potential impact of CO₂ storage on marine life. Examples of comments are provided below:

Table 5.6 – Concerns received in response to Question 3 (ranked by frequency)

Negative Topics/Themes	No.
Continued Use of Fossil Fuels	4
Safety of CO ₂ storage	2
Environmental Impact	1

5.6.14. **Table 5.7** below provides verbatim examples of comments which have been received for each of the above listed concerns.

Table 5.7 – Examples of Negative Comments Received

Negative Theme	Comment
Continued use of fossil fuels	<p><i>“Carbon capture and storage is a tremendous step forward. But it means that you are still burning fossil fuel. Not good.”</i></p> <p><i>“Using fossil fuel (natural gas) to create more CO₂ which is to be stored under the North Sea, to create electricity.</i></p> <p><i>“Solar & wind production of electricity neither use or create fossil fuels or CO₂. Your project is an environmental disaster from conception to completion.”</i></p>
Safety of the storage of CO ₂	<p><i>“What happens to the stored co2? Who is responsible for the global disaster when it happens?”</i></p> <p><i>“The storage of co2. How safe will the plant be?”</i></p>

Environmental Impact *“In the name and interest of all flying life, just what will be the exhaust temperature of the gases being blown out from the exhaust stacks and at what height will they be and what steps can you take that in saving the planet you wipe out a great deal of passing wildlife, wee birds like swifts and wallows just get evaporated at high exhaust temperatures.”*

5.6.15. Just one ‘neutral’ response was received to Question 3. This included several questions regarding community benefits and potential employment skills and training associated with the proposals.

Question 4 – Is there anything specific about the Project that you would like to see more information on in future communications?

5.6.16. **Table 5.8** below lists the topics/themes and questions that respondents raised in terms of where they would like to see more information in future communications/consultations. Where multiple respondents have raised the same topic the number of responses column has been increased.

Table 5.8 – Requests for further information about the Project in future communications/consultations

Theme	Topic/Theme	Number of Responses
Construction	Request for details of the construction programme	3
	Need for any road/infrastructure improvements	1
Employment	Details on job opportunities	3
	How the use of local labour and skills will be prioritised?	2
	How much employment will be generated during the construction and operational phases?	2
	Information on training for local unskilled labour.	1
Technical	Information on the long-term/short-term effects of storing CO2 and its safety.	3
	Further technical details, including plans and drawings.	2
	Information on how the Project will utilise existing pipework/infrastructure	2
	Is there potential for heat recovery?	1
	Can a greater MW capacity/output be achieved?	1

Theme	Topic/Theme	Number of Responses
	Will blasting be used as a means of working through the above hard rock?	1
	Potential for tertiary gas recovery?	1
	Does the Project involve a pipeline to the Utsira Aquifer in the Norwegian sector?	1
Ecology	Safety of birds in the vicinity of any proposed exhausts or stacks.	1

6. Proposal of Application Notice (PAN)

6.1.1. Although not a statutory requirement for an application for consent under Section 36 of the 1989 Act, the Applicant issued a Proposal of Application Notice (PAN) to Aberdeenshire Council (the local planning authority) via email on 13th July 2021 (more than 12 weeks prior to the submission of the Application).

6.1.2. The PAN submission set out the Applicant's proposed approach to the Stage 2 Consultation for the Proposed Development.

6.1.3. As confirmed at Section 2 of this PAC Report, Regulation 6 of the 2013 Regulations states that the PAN must:

"... in addition to those matters required by section 35B(4) of the Act, also contain an account of what consultation the applicant intends to undertake, when such consultation is to take place, with whom and what form it will take."

6.1.4. The matters required by Section 35B(4) include:

- A description in general terms of the development to be carried out;
- The postal address of the development site, if it has one;
- A plan showing the outline of the site at which the development is to be carried out and sufficient to identify the site;
- Detail as to how the prospective application may be contacted and corresponded with; and

6.1.5. The PAN submission included a covering letter and the following:

- A completed PAN Form.
- A Site Location Plan.
- A copy of the Applicant's Stakeholder Engagement Plan (SEP).

6.1.6. The PAN submission provided the information referred to in Regulation 6 and Section 35B. A copy of the PAN submission can be found at **Appendix 6.1**.

6.1.7. The Council responded on 22nd July 2021 confirming that the Applicant must undertake the consultation steps as set out in the SEP and that a Pre-application Consultation Report would be required to accompany the Application. The Council did not ask the Applicant to undertake any additional steps in relation to the proposed pre-application consultation. A copy of the Council's response (dated 22nd July 2022) is provided at **Appendix 6.2**.

6.1.8. The Applicant also submitted the PAN to the ECU and the relevant community councils (as listed in the SEP) on the same day as submitting to the Council (13th July 2021). No comments were received from the community councils on the PAN

7. Stage 2 Consultation

7.1. INTRODUCTION

7.1.1. The Stage 2 Consultation ran from 23rd August to 1st October 2021. The Stage 2 Consultation was intended to provide stakeholders with information on the Applicant's more developed proposals for the Site, following further design, technical and environmental assessment work. The Stage 2 Consultation was undertaken in accordance with the PAN. The primary objectives of the Stage 2 Consultation, as set out in the SEP, were to:

- provide a summary of the comments/feedback received to the Stage 1 Consultation;
- provide an update on the Proposed Development, the further work undertaken since Stage 1 and any changes that have been made;
- provide an overview of the Environmental Impact Assessment (EIA) work being undertaken and the key environmental topics and issues; and
- provide stakeholders with the opportunity to engage with the Project Team, ask questions and provide comments/feedback on the more developed proposals.

7.1.2. At the time of the Stage 2 Consultation (late Summer/early Autumn 2021), COVID-19 restrictions had been eased across Scotland. As a result of this and the reduction in COVID-19 cases in Scotland, the Applicant decided to provide stakeholders with the option of attending a number of face-to-face public consultation events. The Applicant sought to provide a COVID-secure environment at the event venues using measures such as pre-booking to control numbers of people, members of the Project Team taking lateral flow test in advance of events and wearing masks during events, providing hand sanitiser and masks at events, and asking those attending to wear mask and observe social distancing.

7.1.3. It should be noted that at the time of the Stage 2 Consultation there was no statutory requirement to hold face-to-face/in-person pre-application consultation events – this requirement has been temporarily suspended on 24th April 2020 by 'The Town and Country Planning (Miscellaneous Temporary Modification) (Coronavirus) (Scotland) Regulations 2020'. The Applicant's decision to hold safe, in-person, consultation events in September was based on the much-reduced COVID rates and eased restrictions at that point in time.

7.1.4. The Applicant again made use of the virtual exhibition space during the consultation to provide an alternative means for stakeholders to access the consultation materials if they were unable to attend a face-to-face event or not comfortable in doing so.

7.2. WHO WAS CONSULTED?

7.2.1. As with the Stage 1 Consultation, the Applicant sought to ensure that all residents and businesses within the 5km Consultation Area were consulted. This involved sending a copy of the newsletter to people within the Consultation Area, along with the key stakeholders as listed in the SEP.

7.2.2. The same local newspapers used for Stage 1 (and circulating across the Consultation Area), were used for the publication of a notice advertising the Stage 2 Consultation. In addition, the notice was also published in a national newspaper. The notices provided information on the Stage 2 Consultation.

7.2.3. The methods used to consult stakeholders are set out in more detail below.

7.3. HOW WERE STAKEHOLDERS CONSULTED?

7.3.1. **Table 7.1** below provides an overview of how the Applicant consulted Stakeholders and how this was undertaken in accordance with the PAN.

7.3.2. Again, it is important to note that there is no statutory requirement to undertake pre-application consultation in respect of applications for consent under Section 36 of the 1989 Act. However, the Applicant took the decision to carry out pre-application consultation on the Proposed Development and in doing so has had regard to the legislative requirements for pre-application consultation for planning applications.

Table 7.1 – Stage 2 Consultation Compliance with PAN

Consultation Activity	Legislative Requirement (for planning applications)	Steps undertaken by the Applicant
Proposal of Application Notice (Regulation 6)	Section 35B and Regulation 6. The prospective applicant must provide to the planning authority a 'proposal of application notice' at least 12 weeks prior to the submission of an application for planning permission.	The PAN was provided to the Aberdeenshire Council (the local planning authority) on 13 th July 2021. More information on the PAN can be found at Section 5.
Pre-application consultation (Regulation 7)	Regulation 7 (2.17) states that “the prospective applicant must consult every community council any part of whose area is within or adjoins the land on which the proposed development is situated.”	<p>The Applicant provided the relevant community councils with a copy of the PAN on 13th July 2021 and informed them of the proposed Stage 2 Consultation.</p> <p>The PAN included the details of the consultation proposed, including a link to the Applicant’s website and virtual exhibition space. The PAN also included dates/times of the face-to-face consultation events, and a copy of the SEP to provide a comprehensive overview of the Applicant’s Stage 2 Consultation.</p> <p>The community councils and local councillors listed in the SEP were also notified of the Stage 2 Consultation via email, with a copy of the community newsletter attached for reference.</p> <p>The following community councils were contacted with the above information:</p>

Consultation Activity	Legislative Requirement (for planning applications)	Steps undertaken by the Applicant
		<ul style="list-style-type: none"> • Boddam and District Community Council; • Cruden Community Council; • Peterhead Community Council; • Buchan East Community Council; and • Longside and District Community Council.
<p>Public Information Event (Regulation 7)</p>	<p>Regulation 7 (2.19) states: “The prospective applicant is required to hold at least one event or members of the public where they can make comments to the prospective applicant on the proposals.”</p> <p>(It should be noted that the legislative requirement to hold a public event in relation for pre-application consultation was temporarily suspended on 24 April 2020 under ‘The Town and Country Planning (Miscellaneous Temporary Modification) (Coronavirus) (Scotland) Regulations 2020’).</p>	<p>During the Stage 2 Consultation, two face-to-face consultation events were held on separate days at the following locations:</p> <p>6th September 2021 (4pm – 7pm) – Buchan Braes Hotel, Boddam</p> <p>7th September 2021 (10am – 12:30pm & 2pm – 4:30pm) – Peterhead Football Club</p> <p>A further consultation event scheduled to take place on 8th September had to be cancelled due to COVID-19 issues.</p> <p>A total of 18 people attended the exhibitions over the two days.</p>
<p>Newsletters issued within the Consultation Area</p>	<p>Section 3B and Regulation 6 (Additional Consultation Methods)</p>	<p>A second newsletter was produced for the Stage 2 Consultation and was delivered to residents and businesses within the 5km Consultation Area. The letter included a comments/feedback form and Freepost address.</p>
<p>Virtual Exhibition</p>	<p>Section 3B and Regulation 6 (Additional Consultation Methods)</p>	<p>As with Stage 1, the Applicant provided a virtual exhibition space. This provided stakeholders with an alternative to attending face-to-face public consultation events. The virtual</p>

Consultation Activity	Legislative Requirement (for planning applications)	Steps undertaken by the Applicant
		<p>exhibition space was available for the duration of the Stage 2 Consultation and provided members of the community the ability to view/download all the Stage 2 consultation materials. Virtual webinar sessions were also scheduled to allow people to engage with and ask questions of the Project Team.</p>
Project Website	Section 3B and Regulation 6 (Additional Consultation Methods)	<p>The project website was used for Stage 2 to host information on the Proposed Development, including the consultation materials and also to provide access to the virtual public consultation event: https://www.ssethermal.com/flexible-generation/development/peterhead-carbon-capture/</p>
Newspaper Notices	Regulation 7 (2.19) states: "Notice of this 'public event' must be published at least 7 days in advance in a newspaper circulating in the locality of the proposed development."	<p>The Stage 2 Consultation was advertised by notice in the following newspapers on the following dates:</p> <p>Press and Journal – 16th and 23rd August 2021; Buchan Observer – 17th and 24th August 2021; and The Herald – 16th August 2021.</p> <p>The notice was published more than 7 days before the face-to-face public consultation events.</p> <p>A copy of the newspaper notice is provided at Appendix 7.1 of this Report.</p>

7.4. WHAT WERE STAKEHOLDERS CONSULTED ON/WHAT INFORMATION WAS PROVIDED?

7.4.1. The Stage 2 Consultation was intended to provide stakeholders with information on the Applicant's more developed proposals for the Site, following further design, technical and environmental assessment work. The following information was provided at Stage 2:

- A second newsletter was produced, which was sent to residents and businesses within the 5km Consultation Area. The newsletter included information on updates to the red line boundary, an indicative 3D model of the Proposed Development, an updated description of the proposals, information on the EIA, construction details and indicative timelines. Stakeholders

were again encouraged to provide feedback through a variety of methods (e.g. comments form, email address, Freephone, Freepost).

- The virtual exhibition space provided information via videos, banners, maps and drawings, all of which was available to download. The structure of the exhibition banners and the information that was provided on them is set out below:
- The Stage 2 Consultation.
 - What has changed since the Stage 1 Consultation?
 - About the Peterhead Carbon Capture Power Station.
 - About the Acorn Project.
 - What is Carbon Capture and Storage?
 - Energy Generation and Carbon Capture at Peterhead.
 - Environmental Impact Assessment topics such as:
- Air Quality
- Landscape and Visual Impact Assessment
- Noise
- Socioeconomics, Tourism and Recreation
- Climate
- Ecology and Ornithology
- Traffic and Transport
- Water Environment and Flood Risk
- Ground Conditions
- Heritage.
 - Indicative Programme.
 - Construction.
 - Haul Routes and Laydown Areas.
 - Earthworks and Connections.
 - Construction Phase Mitigation.
 - Details of how to Provide Comments and Join Webinar Sessions.
- The virtual exhibition space also included:
 - A welcome video to introduce the online exhibition and Stage 2 Consultation.
 - Draft indicative site layout plans.
 - A Stage 1 Consultation summary note.
 - A Frequently asked questions (FAQs) document.
 - A 3D visualisation flythrough of the Proposed Development.
- The following information was available to download from the virtual exhibition space:
 - Stage 1 Consultation Summary Note (including initial feedback analysis and statistics).
 - EIA Scoping Report.
 - Frequently Asked Questions (FAQs) document.
- All of the consultation materials were made available on the project website.
- Three information webinar sessions were delivered to stakeholders on 31st August, 2nd September and 15th September 2021. At each webinar, members of the Project Team gave a presentation on the proposals following which an opportunity was provided for people to ask questions. Stakeholders were able to join the webinars by using the links provided in the newspaper notices, newsletter, virtual exhibition space and project website.

- A Freephone number was provided during the consultation so that stakeholders could speak to the members of the Project Team and ask questions directly. The Freephone number was provided on the newspaper notices, newsletter, virtual exhibition space and project website.
- The above consultation materials and information was also made available at the two face-to-face public consultation events that were held on 6th and 7th September 2021.

7.4.2. Copies of the consultation materials are provided at **Appendix 7.1** of this PAC Report.

7.5. HOW COULD COMMENTS BE PROVIDED/WHAT WAS THE DEADLINE TO DO SO?

7.5.1. Comments and feedback could be provided through the comments form which was attached to the newsletter and which was also available via the virtual exhibition space and project website. Hard copies of the form were also made available at the face-to-face public consultation events. A copy of the Stage 2 comments form is provided at **Appendix 7.2**.

7.5.2. Stakeholders were also able to submit their comments and feedback via the Freepost address, Freephone number and the project email address. A deadline of Friday 1st October 2021 at 5pm for the submission of comments was stated on the newspaper notices, virtual exhibition space, project website and consultation materials.

7.6. RESPONSE TO THE CONSULTATION

7.6.1. A total of 67 feedback forms were received during the Stage 2 Consultation. 62 of these were hard copy forms sent in via Freepost and five forms were received via the online link provided in the virtual exhibition space and on the project website. The following section of this PAC Report provides an analysis of the topics/themes received in those responses, along with an overview of which methods participants chose to use in order to respond (i.e. virtual or physical forms).

7.7. ANALYSIS OF COMMENTS AND FEEDBACK

7.7.1. The main topics/themes that can be drawn from the comments and feedback received in response to the Stage 2 Consultation (provided on the completed virtual/physical feedback forms) are:

- the principle of a CCUS project;
- the use of CCUS technology;
- the continued use of fossil fuels;
- climate change;
- benefits for local community; and
- design and appearance.

Question 1 – Where did you find this comments form?

7.7.2. Question 1 asked respondents to confirm where they found the comments form. The majority of respondents (80%) received the comments form with the newsletter which was posted out to them at the beginning of the consultation. **Table 7.2** below provides a breakdown of how respondents received the comments forms – please note that in some instances respondents selected multiple answers.

Table 7.2 – Where did you find this feedback form?

Newsletter	On the Project Website	In the Virtual Exhibition Space	Public Exhibition	Other
46	1	1	5	4

7.7.3. None of the respondents who answered “other” confirmed how the comments form was received. Of the 67 respondents, 12 people chose not to answer this question.

Question 2 – Which of our consultation methods have you used?

7.7.4. Question 2 asked people which of the consultation methods they used. The most popular consultation method selected was the newsletter (59%). **Table 7.3** below provides a breakdown of the responses to Question 2 – please note that respondents were encouraged to tick all answers that applied, therefore, multiple answers may have been selected.

Table 7.3 – Consultation Methods Used by Respondents

Newsletter	Project Website	Virtual Exhibition	Attended a Public Exhibition in Person	Used the Freephone Telephone Line	Used the Project Email Address	Used the Freepost Address	Attended a Webinar
44	8	7	7	1	3	4	0

Question 3 – Are you satisfied with the consultation methods that have been used and were you able to find the information you wanted? Please tick one of the following and leave any comments you have in the box below.

7.7.5. Question 3 asked if people were satisfied with the consultation methods used by the Applicant and if they were able to find all the information they wanted. Of the 64 respondents who completed this question, 61 answered ‘Yes’ and only 3 answered ‘No’.

Question 4 – What do you think are the three most important issues relating to the Project?

7.7.6. Question 4 asked respondents to select three issues that they felt were the most important issues relating to the Proposed Development. Of the responses received, the most important issues chosen by respondents included benefit for the local community (28%), reducing carbon dioxide emissions and achieving ‘Net Zero’ (25%) and air quality (19%). The issues to listed on the form are detailed in **Table 7.4** below, alongside the number of responses for each choice.

Table 7.4 – Most important Issues Selected by Respondents

Issue(s)	Number of Responses
Benefit for the local community (e.g. local employment and training)	52
Reducing carbon dioxide emissions and achieving ‘Net Zero’	46
Air quality	35
Safety	19

Noise	13
Ecology and biodiversity	12
Design and visual Appearance	4
Traffic	4

Question 5 – Do you have any views on how the new power station should look? Please tick one of the following and leave any comments in the box below.

7.7.7. Question 5 asked respondents if they had any views on the appearance of the proposed power station. Only 8 of the 64 people who responded, answered ‘Yes’.

7.7.8. The results for those respondents who answered ‘Yes’ are shown in **Table 7.5** below and have been categorised into response topics/themes.

Table 7.5 – Comments on the appearance of the Power Station

Response Theme/Topic	Number of Responses
Modern/functional design	3
Similar design to the existing power station	2
Camouflage cladding	1
Design displayed in virtual exhibition	1
Other	3

Question 6 – Has the information provided as part of this consultation addressed any questions you have around the use of Carbon Capture and Storage technology? Please tick one of the following and leave any comments you have in the box below.

7.7.9. Question 6 asked respondents if the consultation successfully addressed any questions surrounding the use of carbon capture and storage technology. The responses are detailed in the **Table 7.6** below.

Table 7.6 – Has the information provided addressed any questions you have around the use of Carbon Capture and Storage technology?

Response	Number of Responses
Yes	53
No	10

7.7.10. Respondents were also encouraged to leave comments and questions in the box presented on the comments form. The responses have been categorised into response themes in the **Table 7.7** below, alongside example questions and comments.

Table 7.7 – Additional Questions and Comments

Question and Comments Topics/Themes	Example Questions/Comments	Number of Responses
Potential Leak of CO ₂	<p><i>“(Yes) Asked about how the co2 will be kept stopping it leaking into site & sea. Making another problem related. This has not been addressed in the presentations.”</i></p> <p><i>“(No) This presentation points out that the carbon storage is subject to different planning. What if that planning isn't approved? Will the stored carbon leak from the old well?”</i></p>	2
Environmental Impacts	<p><i>“(Yes) Well, so, the NSHEB consultation previously in the '70's didn't mention air pollution, noise into Laird's Walk, Radioactive Particles, etc.</i></p> <p><i>Will be looking for the whole picture this time.”</i></p>	1
More information on technology improvements from previous developments	<p><i>“(Yes) Could do with more tech info on how this version has improved over previous attempts at this project and key CCS performance criteria and how they have changed, etc.</i></p> <p><i>Also implications if this tech was rolled out across whole sector.”</i></p>	1
Consultation successfully addressed questions	<p><i>“(Yes) Clarified the type of use of existing structures.”</i></p> <p><i>“(Yes) Up to date information.”</i></p> <p><i>“(Yes) The member of staff I spoke with was very helpful and answered all my questions.”</i></p> <p><i>“(Yes) Nothing but good for the community.”</i></p> <p><i>“(Yes) But if we had listened to the experts' 20 years ago maybe we wouldn't need carbon capture and we should be more aware of what we're doing to the world.”</i></p>	5
Local Employment	<p><i>“(No) Not enough local positions are taken up by the local people. This would be a good</i></p>	1

Question and Comments Topics/Themes	Example Questions/Comments	Number of Responses
	<i>opportunity to create thousands of jobs for the local community”.</i>	

Question 7 – Please provide any other comments you have on the Project and this consultation below.

7.7.11. Question 7 gave respondents an opportunity to provide any further comments about the Proposed Development or consultation. The responses received have been categorised into ‘Positive’ topics/themes (**Table 7.8**) and ‘Negative’ topics/themes in **Table 7.9**.

7.7.12. **Table 7.10** also provides a list of positive, neutral, and negative example questions received.

7.7.13. Overall, a total of 17 positive comments (65%), 8 neutral comments (30%) and 1 negative comment (3%) were received.

Table 7.8 – Positive Comment Topics/Themes received about the Project and Consultation

Positive Topics/Themes	Number of Responses
General supportive comment	11
Benefits to local community (e.g. jobs)	5
Sustainable energy supply	1
Tackling climate change	1
Environmental benefits	2
Other supportive comment	3

Table 7.9 – Negative Comment Topics/Themes received about the Project and Consultation

Negative Topics/Themes	Number of Responses
Continued use of fossil fuels	1
Viability	1

Table 7.10 – Examples of Positive, Negative and Neutral Comments Received

Example Questions/Comments	
Positive	<p><i>“This is the way for the project to go.”</i></p> <p><i>“Been too long in a decision to commence what has always been a necessary project.”</i></p> <p><i>“Good design, good project, good for the environment.”</i></p> <p><i>“Good news for the area and local economy.”</i></p> <p><i>“We are delighted that this project will be going ahead.”</i></p> <p><i>“Vital component for continual and guaranteed power supply in GB.”</i></p> <p><i>“This project will be a positive change from an environmental aspect and is what needs to happen. This project will also make Peterhead a place known for helping to benefit the environment.”</i></p> <p><i>“Project has had so many false starts, it just needs to get going! Can the timeline be shortened? This is a KEY technology, and we need it yesterday. Good luck team!”</i></p>
Neutral	<p><i>“Would like more information how it/if would impact the harbour directly and the village.”</i></p> <p><i>“Interest in supplying/working with the project - based in Fraserburgh nearby.”</i></p> <p><i>“I think it is long overdue and can't see anything good for the Peterhead area.”</i></p>
Negative	<p><i>“I'm not in favour of this project. Please work on replacing the old power station with renewables and not a transparent piece of green washing. It's not the best way to achieve lower carbon. In fact it will increase the carbon going into the air until the old section of the power station is decommissioned. Why not capture the carbon the current power station is creating. This is green washing. If these companies were serious about reducing carbon emissions they would be investing in solar and wind, not burning more fossil fuels with a bit of green washing attached. None of these problems would exist under wind or solar.”</i></p> <p><i>“There is a similar project to the acorn project in Columbia. Over there, in its 10-year existence it has not lived up to expectations, What makes you think this project will be different?”</i></p>

8. Applicant’s Response to Consultation

8.1.1. The Applicant’s response to the key topics/themes raised by stakeholders and in particular the local community during both the Stage 1 and Stage 2 consultations is set out below in **Table 8.1**. A version of Table 8.1 was issued to people who had responded to the Stage 2 and stated that they wanted to be kept updated on the Proposed Development, on 15th December 2021, in order to provide feedback in advance of the PAC Report being produced and the submission of the Application.

Table 8.1 – Applicant’s Response to Stage 1 and Stage 2 Consultation

Stage 1 or 2	Topic/theme	Description	Applicant’s Response
Stage 1	Ecology	Threat to oyster plant colony located between Furrah Head and Boddam as a result of the Proposed Development.	Chapter 11 (Biodiversity and Nature Conservation) of the EIA Report confirms that there is no possibility of direct injury or killing of any oysterplant specimens in connection with the construction or operation of the Proposed Development. It is also confirmed that there is a negligible effect on oysterplants through construction and operational airborne pollution.
Stage 1	Local employment	32% of responses detailed the request for strong local involvement and increase local employment opportunities as part of the Proposed Development.	The Applicant is committed to maximising the use of local companies to support the construction and operation of the Proposed Development, as far as is reasonably practicable. As the Proposed Development progresses, the Applicant will engage with the local supply chain through activities such as ‘Meet the Buyer’ events.
Stage 1	Environmental damage	12% of responses raise concerns over the long-term effects of storing CO ₂ , possible leakage, atmospheric warming, continued use of fossil fuels and safety of the plant.	Detailed environmental studies have been undertaken as part of the EIA, including a Climate Change assessment, and a worst-case scenario has been adopted. The Applicant has concluded on the basis of the EIA Report that there are no likely significant residual adverse effects in relation to air quality, climate change or Major Accidents and Disasters. Furthermore, the technologies associated with carbon capture and storage are well understood. Further information on environmental assessments and project design is detailed in

Stage 1 or 2	Topic/theme	Description	Applicant's Response
			<ul style="list-style-type: none"> • Chapter 8: Air Quality, • Chapter 18: Climate Change • Chapter 19: Major Accidents and Disasters in the EIA Report.
Stage 1	Existing Infrastructure	Would like to know more information on how the existing infrastructure such as pipework will be used.	<p>Further information on the design of the Proposed Development was provided in the Stage 2 consultation materials. Existing infrastructure currently proposed to be used for the Proposed Development is detailed in Chapter 4 of the EIA Report. Examples of this include:</p> <p>Use of existing cooling water infrastructure including the outfall and intake new pipework for the outfall.</p> <p>Use of existing electrical substation with new cabling to be provided.</p>
Stage 2	Benefits for the local community (e.g. local employment and training).	25% of the responses received indicated that benefits for the local community is the most important issues relating to the project.	The Applicant is committed to using local companies to support the construction and operation of the Proposed Development, and as stated above, will engage with the local supply chain through 'Meet the Buyer' events. The Applicant is also committed to creating a positive impact locally and will consider charitable donation schemes and wider support initiatives to local schools and businesses.
Stage 2	Reducing CO ₂ Emissions	68% of responses indicated that reducing CO ₂ emissions and achieving Net Zero is one of the three most important issues related to the project.	The Applicant will only progress the Proposed Development if it has a clear path to decarbonisation. The new Power Station will be fitted with carbon capture plant and will make a positive contribution toward the Scottish Government's target of net zero greenhouse gas emissions by 2045.

Stage 1 or 2	Topic/theme	Description	Applicant's Response
Stage 2	Environment	<p>Consultees were asked to list the three most important issues relating to the project:</p> <ul style="list-style-type: none"> • Air quality 54% • Safety 29% • Ecology 19% • Noise 20% • Traffic 6% 	<p>Detailed environmental studies have been undertaken as part of the EIA including air quality, ecology, noise and transport assessments. These will assess the worst-case scenario for each discipline and where significant impacts are identified, appropriate mitigation will be identified and embedded into the project design. Further information on environmental assessments and project design is detailed in the EIA Report.</p> <hr/> <p>Improving air quality and harmful emissions.</p> <p>The carbon capture plant will be able to capture at least 90% and up to 95% of CO₂ produced by the new Power Station, which will lower the amount of carbon released to the atmosphere. Emissions of other pollutants will be minimised through process design and abatement techniques and residual emissions will be adequately dispersed from an appropriate stack height. Further details of the air quality assessment have been included in the EIA Report.</p> <hr/> <p>Concerns of stored carbon leaking from oil field storage under the North Sea.</p> <p>This would be considered as part of the Acorn CCS Project application which accesses the transport and storage of the captured CO₂ and is outside the scope of this assessment. However, the Applicant is reassured that the Acorn Project storage site geology is capable of storing the CO₂ for thousands of years.</p> <hr/> <p>More information on how / if the Proposed Development would impact the harbour directly and the Village of Boddam</p> <p>Further information on the wider impacts is detailed in Chapter 8 – 19 of the EIA Report. No direct impacts are envisaged to Boddam harbour.</p>

Stage 1 or 2	Topic/theme	Description	Applicant's Response
Stage 2	Planning consent	Concerns raised due to the carbon storage being dependent on the Acorn Project which is a separate application. What would happen if the Acorn Project planning application is denied?	The Proposed Development is reliant on the Acorn Project and the Applicant will only progress it if a clear path to decarbonisation is present.
Stage 2	Design of the Proposed Development	Consultee responses suggests the design of the Proposed Development should be modern, pleasing to the eye, not intrusive on the landscape and should look similar to the existing power station.	The Applicant notes this suggestion. Views have been taken into consideration for the design of the Proposed Development, please refer to Chapter 15 'Landscape and Visual Impact Assessment' of the EIA Report and the Design and Access Statement.
Stage 2	Technology Improvements	More information on Technology Improvements from Previous Developments	The Applicant notes this request. Further information on the technology used as part of the Proposed Development is provided in the Chapter 4 'Proposed Development' of the EIA Report.
Stage 1 and 2	Proposed Development long overdue	A general theme from both rounds of consultation is that this project is long overdue, vital to the area and a good project for the area.	The Applicant agrees with this sentiment and is committed to developing this technology at Peterhead.
Stage 1 and 2	Environmental Benefits	A general theme from both stages of consultation is how this project will help meet the Net Zero commitment by 2050 set by the government and how it is a step in the right direct	The Applicant agrees with this sentiment and will only progress the Proposed Development if there is a clear path to decarbonisation.

Stage 1 or 2	Topic/theme	Description	Applicant's Response
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for the future of the environment.

9. Summary and Conclusions

- 9.1.1. The Proposed Development comprises an electricity generating station with a gross electrical output in excess of 50 MW, which means that consent to construct and operate the generating station must be obtained from the Scottish Ministers under Section 36 of the 1989 Act.
- 9.1.2. There is no statutory requirement to undertake pre-application consultation in respect of applications for consent under Section 36 of the 1989 Act. However, in view of the National Development status of the Site in NPF4 (and draft NPF4), the Applicant took the decision to carry out pre-application consultation in respect of the Proposed Development.
- 9.1.3. The Applicant's approach to the pre-application consultation on the Proposed Development has broadly mirrored the requirements of the TCP(S)A 1997 and the 2013 Regulations.
- 9.1.4. In preparing the Stakeholder Engagement Strategy (SEP) for the Proposed Development, the Applicant has had regard to the TCP(S)A 1997 and the 2013 Regulations in addition to Aberdeenshire Council's published planning advice on pre-application consultation. The Proposal of Application Notice (PAN) submitted to the Council (and relevant community councils) was accompanied by a copy of the SEP. Neither Aberdeenshire Council nor the community councils raised any issues with regard to the proposals for pre-application consultation set out in the PAN submission.
- 9.1.5. The Applicant has undertaken two stages of pre-application consultation on the Proposed Development. Stage 1 in May/June 2021 was used to introduce the proposals to the local community and other stakeholders. Stage 2 in late summer/early autumn 2021, provided an update on the proposals and provided more detail on them, which was informed by the design, technical and environmental work undertaken since Stage 1.
- 9.1.6. The pre-application consultation took place during the COVID-19 pandemic. Due to the restrictions in place at the time it was not possible for the Applicant to hold face-to-face public consultation events at Stage 1. The Applicant therefore deployed a range of consultation methods to enable stakeholders to engage. These included a newsletter that was sent to residents and businesses within the 5km Consultation Area, newspaper notices, the use of a virtual exhibition venue and making information available on the project website. People were able to submit comments using a comments form attached to the newsletter, an online version and also to get in touch by Freepost, Freephone and email.
- 9.1.7. At Stage 2, the Applicant deployed the same range of consultation methods but also held two face-to-face public consultation events as COVID-19 restrictions had been eased. A total of 18 people attended these events.
- 9.1.8. A total of 41 responses were received to Stage 1, with 67 responses received to Stage 2. The majority of comments and feedback received to both stages of consultation was positive. The main topics/themes raised reducing carbon emissions in order to meet legally binding targets of achieving net zero in terms of greenhouse gas emissions; the use of CCS/CCUS technology; employment; local/community benefits; and the assessment of environmental effects. The Applicant has had regard to the comments and feedback received to the pre-application consultation and following the Stage 2 consultation issued a response to the main topics/themes raised in order to provide feedback in advance of this PAC Report being produced and the submission of the Application.
- 9.1.9. In conclusion, it is considered that the Applicant has carried out comprehensive and meaningful pre-application consultation in respect of the Proposed Development in advance of submitting the Application to the Scottish Ministers.