

Technical Appendix 6.3: Vegetation Assessment of Proposed Development Footprint Location



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Summary

Alba Ecology Ltd. was commissioned by Neshion Ltd. ('the Applicant') to provide a vegetation assessment of a proposed renewable energy development (the 'Proposed Development') in Shetland, Scotland, as part of the Environmental Impact Assessment Report (EIAR) process.

The proposed turbine locations, hardstanding, track, borrow pits and compounds (together termed the 'Proposed Development Footprint' hereafter), were walked in June and December 2025 using a design layout that was current at that time (**Figure 1: Study Area and Design Layouts Walked in June 2025 and December 2025 and the Final Design Layout (the 'Proposed Development Footprint') (Feb 2026)**). The vegetation at 18 locations was assessed using quadrat and transect data. The track and infrastructure routes were carefully walked, and target notes made.

The vegetation was considered in relation to NatureScot guidance (2023, updated in 2026) on peatland habitats. It considered aspects such as peat formation, natural surface patterns and the specific aspects of the Site of Special Scientific Interest (SSSI) selection criteria for blanket bog (Joint Nature Conservation Committee (JNCC), 1994).

The peatland habitats potentially impacted by the Development Footprint are M17b and M19 blanket bog. Based on NatureScot guidance, these communities have the potential to be considered of National Interest which may result in an objection if they are found to be actively forming peat with indicator species and features of near natural condition. Based on the evidence presented from this detailed survey, and given the lack of surface water-logging features, and the conditions described, overall, it is considered that any M17b and M19 blanket bog that would be impacted by the Proposed Development Footprint is likely to be inactive and does not have a natural surface pattern. It did not meet the SSSI selection criteria.

M2 and M3 pools may also be impacted by the design. The initial June 2025 survey informed the design and resulted in avoidance of these pools wherever possible. If consent is granted further micro-siting avoidance of these features is recommended wherever possible through the use of an experienced peatland Ecological Clerk of Works (ECoW).

To comply with NatureScot guidance and National Planning Framework 4 (NPF4) the mitigation hierarchy should be followed and peatland restoration opportunities identified.

This document reports the findings of the vegetation assessment undertaken by Dr Kate Massey, MCIEEM of Alba Ecology Ltd. in June and December 2025.

Introduction

Alba Ecology Ltd. was commissioned by Neshion Ltd. ('the Applicant') to provide a vegetation assessment of a proposed renewable energy development (the 'Proposed Development') comprised of up to eight wind turbines, a Battery Energy Storage System (BESS) and associated infrastructure adjacent to Sullom Voe Oil Terminal (SVT) and the Shetland Gas Plant in Shetland, Scotland. The Proposed Development is described in **Chapter 2: Proposed Development (EIAR Volume 2)**.

A standard suite of habitat surveys, including a Phase 1 Habitat, National Vegetation Classification (NVC), Groundwater Dependent Terrestrial Ecosystem (GWDTE) assessment and Peatland Condition Assessment (PCA) was undertaken for the Proposed Development in July 2022 by Alba Ecology Ltd and is reported in **Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 2)**.

This survey is specifically in relation to NatureScot's guidance (2023, which was updated in March 2026) on peatland habitats and considers aspects such as peat formation, natural surface patterns and the specific aspects of the Site of Special Scientific Interest (SSSI) selection criteria for blanket bog (Joint Nature Conservation Committee (JNCC, 1994).

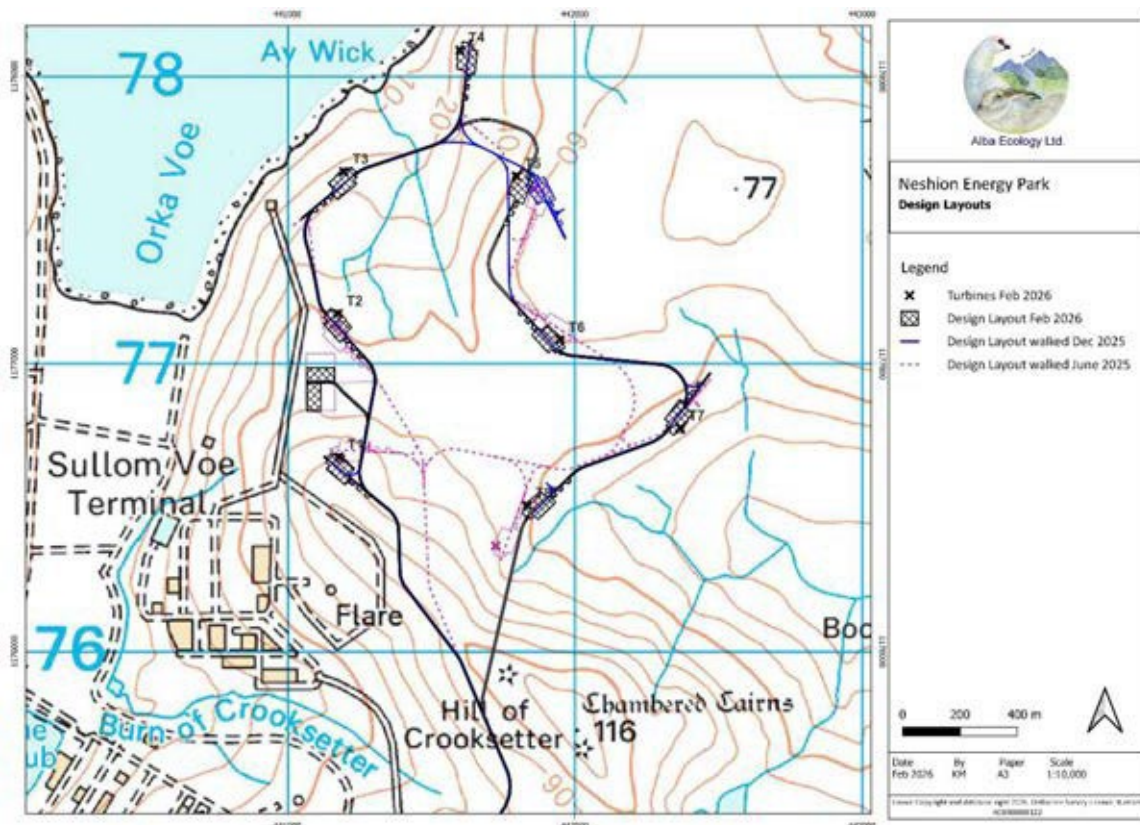
The proposed turbine locations, hardstanding, track and compound (together termed the 'Proposed Development Footprint'), were walked in June 2025 using a design layout that was current at that time (**Figure 1: Study Area and Design Layouts Walked in June 2025 and December 2025 and the Final Design Layout (the 'Proposed Development Footprint') (Feb 2026)**). The vegetation along the Proposed Development Footprint was considered in relation to NatureScot's guidance and assessed using quadrat and transect data. Initial findings were reported to the Applicant in July 2025 (**Annex 1: Target Notes and Design Advice from June 2025**) and design layout alterations were made based on this advice.

Following recommended design changes to avoid the most sensitive habitats, a second survey was undertaken in December 2025 using an updated design layout (**Figure 1: Study Area and Design Layouts Walked in June 2025 and December 2025 and the Final Design Layout (the 'Development Footprint') (Feb 2026)**). The revised track and infrastructure routes were carefully walked, additional quadrat and transect data was collected. Target notes were made and are reported in **Annex A: Target Notes and Design Advice from June 2025** and **Annex B: Target Notes December 2025**.

The findings from this second survey were reported to the Applicant in December 2025, and a design layout was finalised in February 2026 (**Figure 1: Study Area and Design Layouts Walked in June 2025 and December 2025 and the Final Design Layout (the 'Development Footprint') (Feb 2026)**).

This document reports the findings of the vegetation assessment undertaken by Dr Kate Massey, MCIEEM of Alba Ecology Ltd. in both June and December 2025 to help inform the final design layout and EIA process for the Proposed Development.

Figure 1: Study Area and Design Layouts Walked in June 2025 and December 2025 and the Final Design Layout (the 'Development Footprint') (Feb 2026).



Aims and Objectives

The objectives for this survey and report are to:

- Visit the Proposed Development Footprint locations and consider the type and the condition of any peatland habitats present;
- Consider the vegetation at the Proposed Development Footprint in relation to NatureScot guidance (2023, 2026) for peatland habitats;
- Consider the blanket bog at each of these locations in relation to SSSI selection criteria objectives; and
- Advise the Applicant of any infrastructure changes required as a consequence of these results.

Background

Standard habitat and vegetation survey techniques were not repeated for this targeted vegetation assessment. This targeted vegetation assessment provides a more detailed, localised consideration of the vegetation at each of the proposed turbine locations, although NVC communities were noted at each location for information. This survey report has been produced in response to NatureScot guidance (2023, updated 2026) on peatland habitats as well as requirements in National Planning Framework 4 (NPF4) to demonstrate the use of the mitigation hierarchy to avoid and minimise impacts on peatland habitats.

NatureScot guidance (2023, updated 2026) sets out how they will provide developers, planning authorities and Scottish Government with advice on the assessment of likely effects of development proposals on peatland, carbon-rich soils and priority peatland habitats whilst taking into consideration NPF4. The NatureScot guidance (2023, updated 2026) sets out the framework which will help them decide when proposals sited on peatland and carbon-rich soils raise natural heritage issues of so called 'national interest', and therefore where they may object to planned developments. It states:

- *"A key focus will be on helping to ensure that development is designed and constructed to follow the mitigation hierarchy set out in NPF4 and that, in addition, biodiversity enhancement is delivered through peatland restoration".*
- *"The guidance involves an appraisal of whether there are peatlands on a development site which have vegetation features which are indicators of being high quality and in a near-natural condition. This assessment is based on the JNCC Guidelines for the selection of biological Site of Special Scientific Interest (SSSI) - Chapter 8 - Bogs, which is a peer reviewed standard that forms our best evidence".*

As a consequence, Dr Kate Massey, a highly experienced peatland habitat surveyor, undertook this vegetation assessment to provide detailed, site-specific information for the Development Footprint to help inform associated assessments on peatland habitats.

NatureScot guidance (2023, updated 2026)

According to NatureScot guidance (2023, updated 2026) peatland communities that could be priority peatland habitats, that should normally be **completely avoided** are M1, M2 and M3 bog pools occupying waterlogged depressions, shallow pools and erosion channels on bogs. It is noted though that *"these communities especially M3 can be associated with erosion features, if this is the case avoidance is often not essential."*

Peatland communities, which could be priority peatland habitats, where impacts have the **potential** to raise issues of national interest are M17, M18 and M19.

Peatland communities, which could be priority peatland habitats, that are **less likely** to raise issues of national interest include the modified communities on deep peat M15, M20 and M25. NatureScot state that impacts on these communities are unlikely to raise issues of national interest, but developers should still follow the mitigation hierarchy. These communities could also be important candidates, as well other peatland communities, for measures to offset impacts from proposed development and areas where enhancement measures could be located.

NatureScot guidance (2023, updated 2026) states that *"if, following specialist advice, it is confirmed that the habitat is priority peatland which is **actively forming peat with indicator species and features of near natural condition**, and taking into account the impacts and the mitigation hierarchy, that there are likely to be adverse impacts on the habitat, then our conclusion is likely to be that the proposal raises issues of national interest. There may also be some cases where not all criteria in the Template are met, but due, for example to the magnitude of the effects, we may conclude that the proposal raises issues of national interest"*.

NatureScot guidance (2023, updated 2026) advises that NVC communities M17, M18 and M19 have the potential to raise issues of national interest, i.e. they have the potential to be actively forming peat with indicator species and features of near natural condition. Due to widespread and ongoing modifying influences on blanket bog, such as climate change, nitrogen deposition, grazing, draining and muirburn, it is clear that not all M17, M18 and M19 bog in Scotland or Shetland is considered to be in this actively forming peat state. Thus, NatureScot require a detailed habitat survey (NVC) and an assessment of condition, as well as a detailed consideration of vegetation.

The NatureScot guidance (2023, updated 2026) can be linked with the definition of Annex 1 habitats and Annex 1 priority habitats. Blanket bog is listed as an Annex 1 habitat under the Habitats Directive, this includes all bog habitat including degraded forms. Only active blanket bog is considered an Annex 1 priority habitat under the Habitats Directive. The definition of 'active' based on Annex 1 habitat definitions is "*a significant area of vegetation that is normally peat-forming*".

Methods

This vegetation assessment provides a detailed, evidence-based localised consideration of the vegetation at the proposed Development Footprint.

Vegetation Assessment of the Proposed Development Footprint Locations

The vegetation survey of the Proposed Development Footprint draws upon various published information and guidance (e.g. Lindsay *et al.* 2014a-c, Lindsay, 1995, Glenk *et al.* 2017, SNH, 2016; NatureScot, 2023, updated 2026) and uses well established vegetation assessment techniques, namely quadrats and transects. This has been completed for the Proposed Development Footprint to provide a detailed, evidence-based and transparent approach to address NatureScot's considerations of the blanket bog habitat in relation to the national interest, SSSI selection criteria and whether the blanket bog is of "*high quality*", meets the SSSI selection criteria and is actively forming peat with indicator species and has features of near natural condition.

The proposed design layouts were visited in June 2025 and December 2025. A total of 18 locations were assessed using quadrat and transect data. This included all eight turbine locations, six locations that were included in the design layout in June 2025 plus two areas which were in Near-Natural condition as a comparison. In December 2025 two additional turbine locations were assessed using quadrat and transect data due to design changes. Much of the track and laydown areas were walked and target notes were made.

At each location that was assessed a 2 m x 2 m quadrat was placed over a representative vegetation sample and the percentage cover recorded for each plant species including *Sphagnum* moss cover, along with the percentage of bare peat, the presences of any hoof prints, dung, and notes on any damage to the *Sphagnum* moss layer where present. The depth of the *Sphagnum* layer was also measured.

The proportion of the location that was vegetation, bare peat, rock or water was also quantified through a walked transect assessment by walking c. 50 m in usually in a north and then a

south direction from the centre of the quadrat location. The quadrat and transect data provide a representative sample of the vegetation at these 18 locations.

The area surrounding the quadrat location was searched for bog pools, *Sphagnum* hummocks, erosion features and any other features of note. A series of representative photographs were also taken.

PCA Support Tool

The PCA Support Tool is an online tool designed to assess the condition of peatlands. The tool was created by researchers at Scotland's Rural College (SRUC), The James Hutton Institute and the University of Leeds to support NatureScot's Peatland ACTION programme. It was developed using available scientific information and expert opinion and gives descriptions of peatlands as being in good, intermediate or bad condition (Glenk *et al*, 2017). The criteria for these are shown in **Table 1**.

The data collected from the Proposed Development Footprint locations were considered in relation to the PCA Support Tool which describes if a bog is likely to be actively forming peat or not (Glenk *et al*. 2017). Peatland activity is the formation of peat when plant material does not decompose due to water-logged conditions. **Table 1** provides an outline of the criteria used in the PCA Support Tool to assess peatland activity. Consideration was also given to the International Union for Conservation of Nature (IUCN) descriptions of blanket bog activity (Lindsay, 2014a-c).

*Table 1: PCA Support Tool Categories of 'Good, Intermediate and Bad' Peatland (Glenk *et al.*, 2017).*

Signs	Good	Intermediate	Bad
Water	Plenty of water, visible on the surface.	Surface water is rarely visible.	Deep gullies have formed from wind and water erosion.
Vegetation	Small grasses, <i>Sphagnum</i> moss common and very wet.	Taller plants, such as cottongrasses and heather.	Rarely any plants grow on the areas that are exposed. Patches of grasses or heather are still found on 'islands' in between exposed bare peat.
Bare peat	Little to no bare peat patches.	Bare peat patches are occasional, burning may occur.	Bare peat areas will continue to expand, leaving less plant cover as protection on the surface. Peat will continue to be lost until the solid rock is exposed.
Water quality	Water flowing from good quality peatland is clear.	Water flowing from peatland likely to be slightly brown, especially after heavy rainfall.	Bad quality, it can be dark brown from the peat content.
Wildlife	Good for wildlife.	Wildlife less abundant than in good condition.	Home to little wildlife.
Resultant Activity	Active	Stopped growing, inactive	Inactive

Consideration of SSSI Selection Criteria

Following on from NatureScot guidance (2023, updated 2026) the data collected through the vegetation assessment from the Development Footprint quadrat/transect locations has been considered in relation to key aspects of the SSSI selection criteria (as per JNCC, 1994).

NatureScot's Site Visit Template

NatureScot's 'Site Visit Template' has been completed, based on the field data collected and the evidence provided within this document.

Nomenclature

Common names only are given in this report for higher plant species. Nomenclature follows Streeter (2016). Bryophytes are given scientific names and follow Atherton *et al.* (2010). Plant groups comprising many micro-species (such as dandelions *Taraxacum*) are treated as aggregates.

Limitations

GPS accuracy is typically only to c. 3-10 m. When visiting each location, the GPS and aerial photos were followed, and the location found aiming to get as close as possible. A representative sample of vegetation was then assessed, avoiding atypical areas. Therefore, the proposed turbine location and the quadrat data location may not precisely match, but the assessment was considered representative of the vegetation in the Development Footprint.

The other limitations of this survey are common to most vegetation surveys and include an acknowledgement that there is spatial and temporal variation in species appearance, and that the intention of the survey work was not to create a full inventory of all the botanical species of the Study Area.

The vegetation survey was undertaken in December 2025, in cold clear conditions. Frost remained in shadowy areas throughout the survey, although plant identification, including that of moss species, was considered possible. This survey was outwith the usual survey period for standard habitat surveys, and some plants were in a senesced state. However, limitations were minimised as the Study Area, communities and plants were well known to the surveyor who had previously surveyed the vegetation within the Study Area.

Results

A total of 18 locations were assessed using quadrats and transects to determine the type and condition of the vegetation. This included all eight of the proposed turbine locations in June 2025. In addition, in June 2025 a road location, three compound locations and two borrow pit locations were assessed. Two locations identified as Near-Natural blanket bog, that had been deliberately avoided by the design, were also assessed in June 2025 for comparative purposes. In December 2025 two turbine locations were re-assessed due to changes in their locations.

Detailed accounts of each location visited are provided in **Plates 1-18**. **Table 2** and **Table 3** summarise the quadrat and transect data for each visited location. Target notes are provided in **Annex A: Target Notes and Design Advice from June 2025** for June 2025 and **Annex B: Target Notes December 2025** for December 2025.

A Phase 1 Habitat and NVC survey were undertaken for the whole Study Area in July 2022 and is reported in **Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 4)**. The Proposed Development Footprint is largely set within NVC community M17b blanket bog vegetation (**Figure 3: Proposed Development Footprint Over the NVC Data**).

A PCA was also conducted in July 2022 for the whole Study Area and is reported in **Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 4)**. It was reported that the blanket bog habitat within the Study Area had notably variable condition, that was on a continuum from very wet, high quality blanket bog to Modified through grazing pressure, Drained through a series of drainage ditches to areas that were considered degraded and Actively Eroding. The Actively Eroding areas were considered to have high restoration potential.

All of the areas mapped as being in Near-Natural condition and Active Eroding condition have been completely avoided by the current design layout (**Figure 4: PCA with Proposed Development Footprint Overlain**).

Figure 2: Quadrat Locations

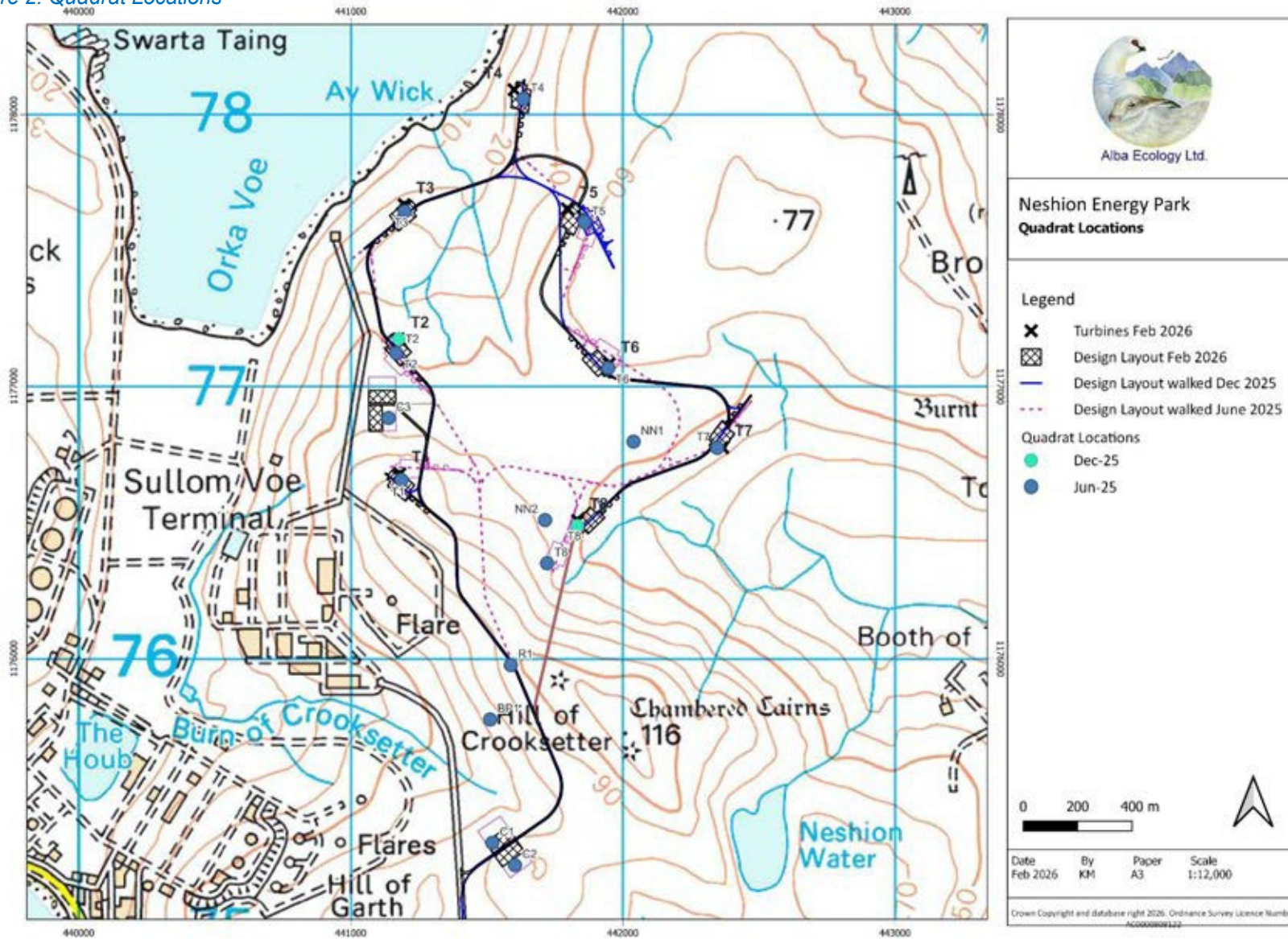


Figure 3: Proposed Development Footprint Over the NVC Data

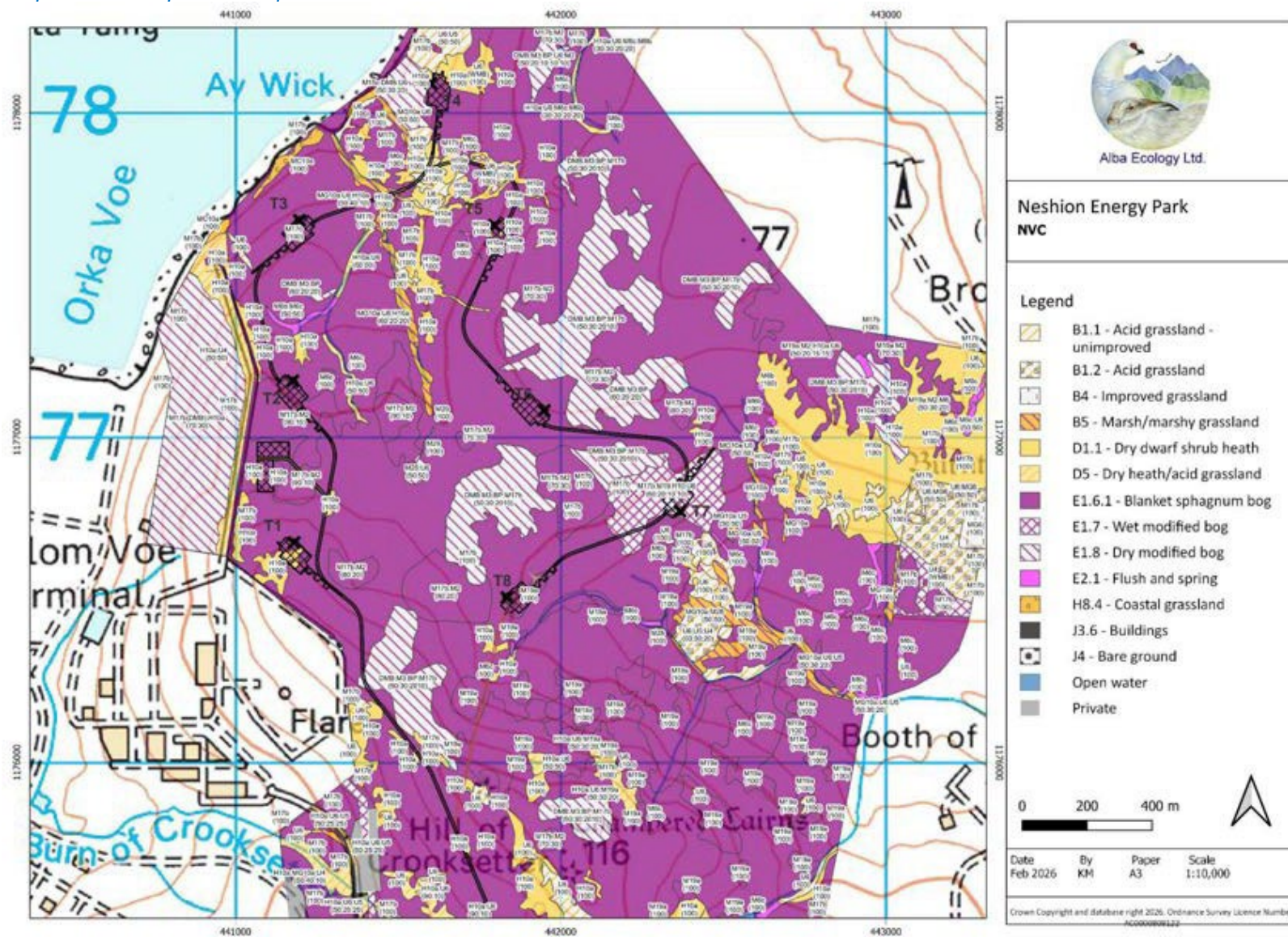


Figure 4: PCA with Proposed Development Footprint Overlay

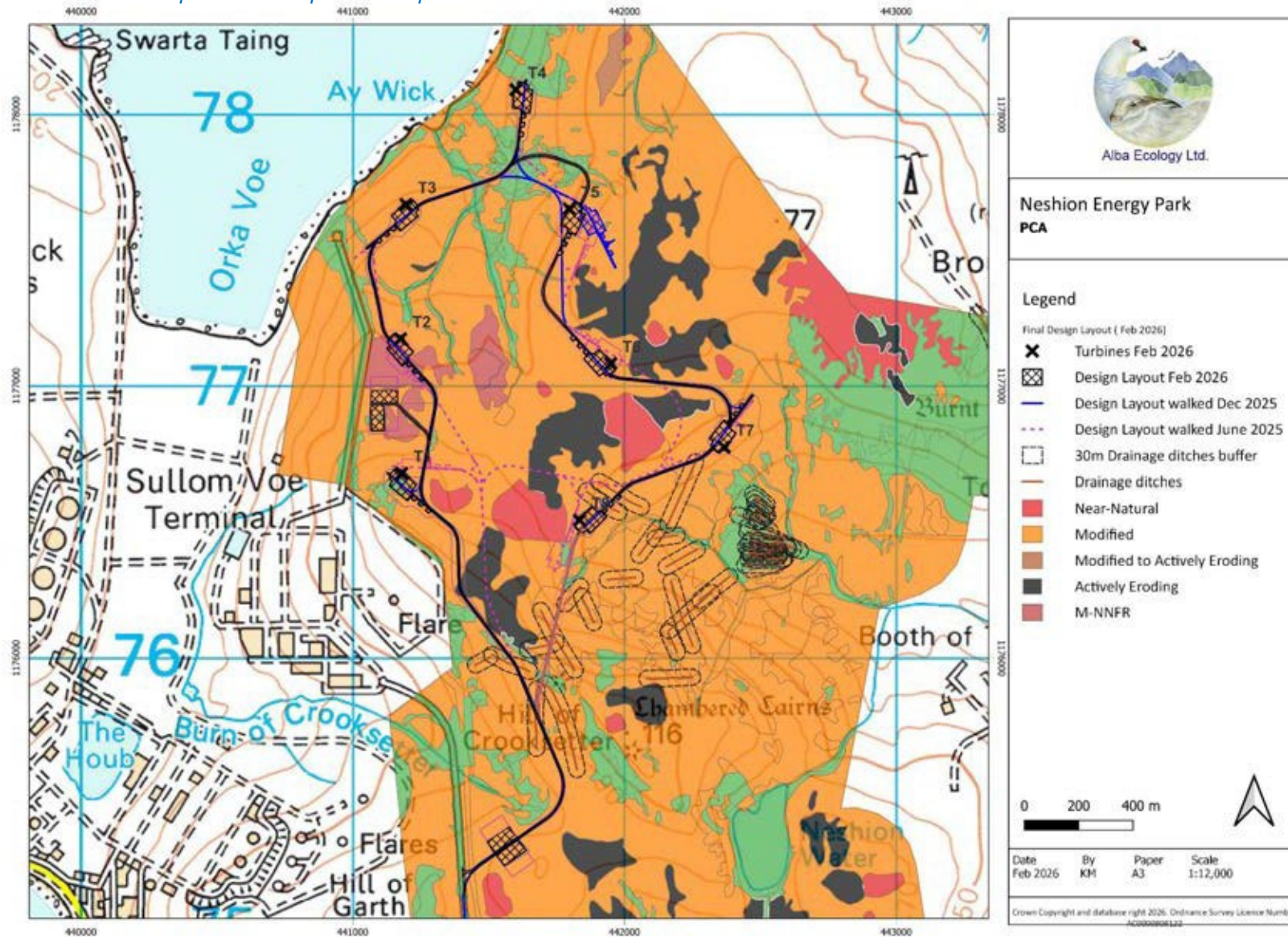


Plate 1: Proposed Turbine Location T1



Photo T1.4: Dung in vegetation



Photo T1.5: Erosion features present in transect

Proposed Turbine Location T1:

Vegetation: 1.1117b blanket bog vegetation with dense heather, common cottongrass and rare's-tail cottongrass.

Moss layer: Moss layer in quadrat made up of *Hylocomium splendens*. Very small amount of *Sphagnum capillifolium* recorded.

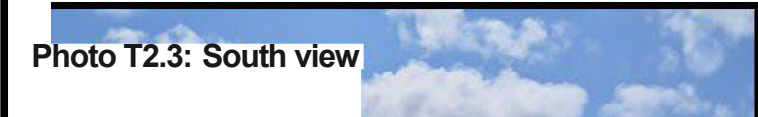
Evidence of modification: Dense, species poor vegetation indicative of long-term grazing pressure. Sheep presence evident.

Erosion/ drainage features: Two erosion features in the north transect and one in the south transect.

Pools: No pools or surface water present in vicinity.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. Sphagnum-mosses were generally absent and did not form a continuous layer. Vegetation made up of dense heather and cottongrass vegetation.

Plate 2: Proposed Turbine Location T2



Proposed Turbine Location T2:

Vegetation: M17b vegetation, largely heather and common cottongrass with lichens. A little cowberry and cowberry present. Dry underfoot.

Moss layer: *Racomitrium lanuginosum* was the most abundant moss species. There was very little *S. capillifolium* recorded in the quadrat. An occasional *S. capillifolium hummock* was noted in the area. Lichen was abundant.

Evidence of modification: There were recent patches of dung and hoof marks in the quadrat. The vegetation was dry and dominated by heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: A re-vegetated erosion feature was present in the south transect.

Pools: Two pools were present in the north transect, and there were occasional pools in the vicinity. Mostly they were bare peat with water from recent heavy rain on top.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses did not form a continuous layer. Vegetation made up of thick, dense heather and cottongrasses.

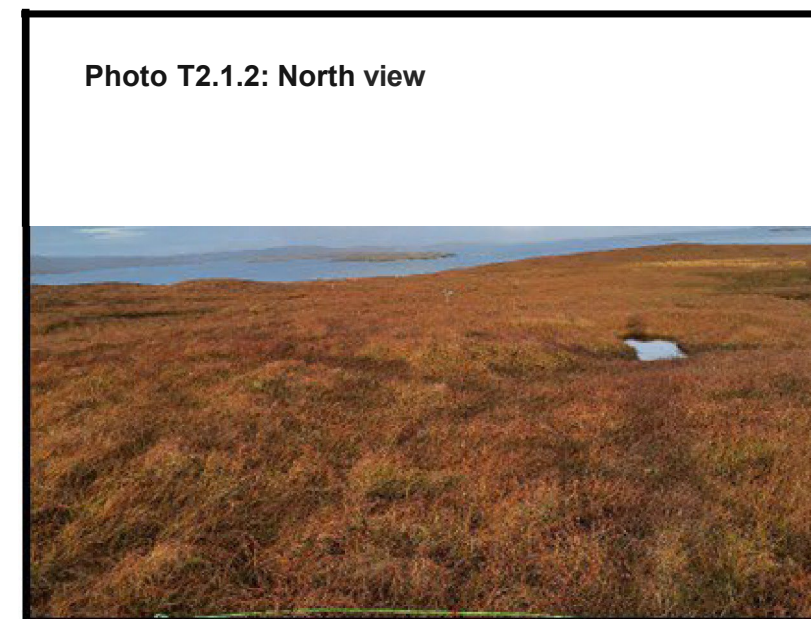
Turbine location moved north to reduce potential impacts upon area with frequent pools.

Plate 2.1: Proposed Turbine Location T2 - Repositioned To avoid pools

Photo T2.1.1: Quadrat



Photo T2.1.2: North view



Proposed Turbine Location T2:

Vegetation: M17b vegetation. Dense thatch of heather and common cotton grass with crowberry and cross-leaved heath. Dry underfoot

Moss layer: *S. capitatum* recorded in the quadrat as patches.

Evidence of modification: Sheep tracks were present in the transects. The vegetation was dry and dominated by heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: A single erosion feature was recorded in the north transect.

Pools: Two pools were present in the north transect, and there were occasional pools in the vicinity. Mostly they were bare peat with water present.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses did not form a continuous layer. Vegetation made up of a thick thatch of heather and cottongrasses.

Photo T2.1.3: South view



Photo T2.1.4: *S. capitatum* recorded in the quadrat



Photo T2.1.5: Pools in transect

Plate 3: Proposed Turbine Location T3



Photo T3.4: Example pools



Photo T3.5: Example M2 pool with *S. fallax* and *S. cuspidatum*

Proposed Turbine Location T3:

Vegetation: Set in representative M 17b blanket bog. Quadrat was dominated by common cottongrass with heather and Iriare's-tail ootm1grass.

Moss layer: *S. capillitorum* recorded in the quadrat with very small amount of *S. arspidatum* and *S. fallax*. Lichens were also present

Evidence of modification: Tussocky, species poor oommoin cottongrass dominaied vegetation iindicative of long-term grazing pressure. Dung present in quadrat

Erosion/ drainage features: There were no drains or emsion features present in transects.

Pools: Two pools were present in tne north trainsect and there were occasional pools present in the vicinity.

Evidence for active peat formatio,n: Area unlikely ro be normally actively forming peat Graund surfaoe was dry. *Sphagnum-mosses* were patchy and did not f:Orm a oontinuous layer. Vegetati on made up of thick, tussocky oommon ootongrass. Occasional pools present and Sphagnum-mosses present arm.md the edg,eof some. Localised activi ty possibly amund pools.

Plate 4: Proposed Turbine Location T4



Photo T4.4: Single pool. Largely bare peat with *Sphagnum* around the edge



Photo T4.5: Dense graminoid dominated vegetation

Proposed Turbine Location T4:

Vegetation: Turbine located on dry heath. Quadrat taken m1 representative M17b blanket bog vegetation. Vegetation was dry underfoot. It was made up of common cottongrass with heather, crowberry and hare's-tail cottongrass. There was a little bog asprmdel, butterwort and round-leaved sundew recorded in the quadrat.

Moss layer: *S. capHntolium* was the dominant moss species, but it was patchily present. Lichens were also common.

Evidence of modification: Dense graminoid dominated vegetation indicative of long-term grazing pressure.

Erosion/ drainage features: No erosion features or drains present in vicinity.

Pools: There was a single bog pool located in south transect. Little surface water.

Evidence for active peat foliation: Area unlikely to be normally actively forming peat. Ground surface was generally dry. *Sphagnum*-mosses were patchy and did not form a continuous layer. Vegetation made up of thick, heather and cottongrasses. Localised activity possibly around some of the pools.

Plate 5: Proposed Turbine Location T5



Photo T5.4: Butterwort in dense heather and common cottongrass



Photo T5.5: A small patch of *S. capitellatum*

Proposed Turbine Location T5:

Vegetation: Vegetation dominated by common cottongrass with heather and crowberry. Common butterwort present in quadrat.

Moss layer: *S. capitellatum* was the dominant moss species, but it was patchily present. Lichens were also common.

Evidence of modification: Dense, species-poor vegetation indicative of long-term grazing pressure.

Erosion/ drainage features: No drains or erosion features present in the vicinity.

Pools: No pools present in vicinity.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum* mosses were patchy and did not form a continuous layer. Vegetation made up of thick, dense cottongrasses and heather.

Laydown area moved to reduce potential impacts upon nearby
Actively Eroding area with peatland restoration potential.

Plate 6: Proposed Turbine Location T6



Photo T6.4: Water on bare peat



Photo T6.5: Dung and *R. Januginosum* in quadrat

Proposed Turbine Location 1o:

Vegetation: M17b with a dense thatch of heather, common cottongrass, hare's-tail cottongrass and deergrass and a little neat rush.

Moss layer: *Racomitrium lanuginosum* dominated with U-1 lichens. A small amount of *Sphagnum*-moss present in quadrat. Some *S. capillifolium* hummocks in vicinity, including ones damaged by sheep.

Evidence of modification: Dense graminoid dominated vegetation in area indicative of long-term grazing pressure.

Erosion/ drainage features: Single, small erosion feature in north transect.

Pools: Surface includes some hollows. Many of these were largely bare peat at the base with water on top, but some had *S. mspidatum* m. *S. falax* present.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally patchy and did not form a continuous layer. Vegetation made up of thick, graminoids and heather. Some pool hollows were present. Very localised activity possible at some pools.

Laydown area moved to reduce potential impacts upon nearby
Actively Eroding area with peatland restoration potential.

Plate 7: Proposed Turbine Location T7



Proposed Turbine Location TT:

Vegetation: Position was on a small rise of dry heath, quadrat taken in representative bog habitat nearby. Vegetation was dominated by common cottongrass over heather with cowberry and tormentum.

Moss layer: Dominated by *H. spendens* with *Pleurozium schreberi*. Very limited amounts of *Sphagnum*-mosses in quadrat and surrounding area.

Evidence of modification: Evidence of historic peat cuttings. Dense graminoid dominated vegetation indicative of long-term grazing pressure.

Erosion/ drainage features: Erosion feature present at end of north transect. Historic peat cuttings in surrounding area.

Pools: Single pool present in north transect.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally absent and did not form a continuous layer. Vegetation made up of thick, common cottongrass and heather.

Plate 8: Proposed Turbine Location TB



Proposed Turbine Location T8:

Vegetation: Uniform M17b blanket bog dominated by dense common cottongrass with heather.

Moss layer: Dominated by *S. capillifolium* in patches below the common cottongrass.

Evidence of modification: Sheep signs common. The vegetation was dry underfoot and dominated by heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: One drain in north transect.

Pools: No surface water in transects or vicinity, but Near-Natural bog nearby with frequent bog pools.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. Sphagnum-mosses were generally patchy and did not form a continuous layer. Vegetation made up of thick, common cottongrass and heather. However, Near-Natural blanket bog nearby.

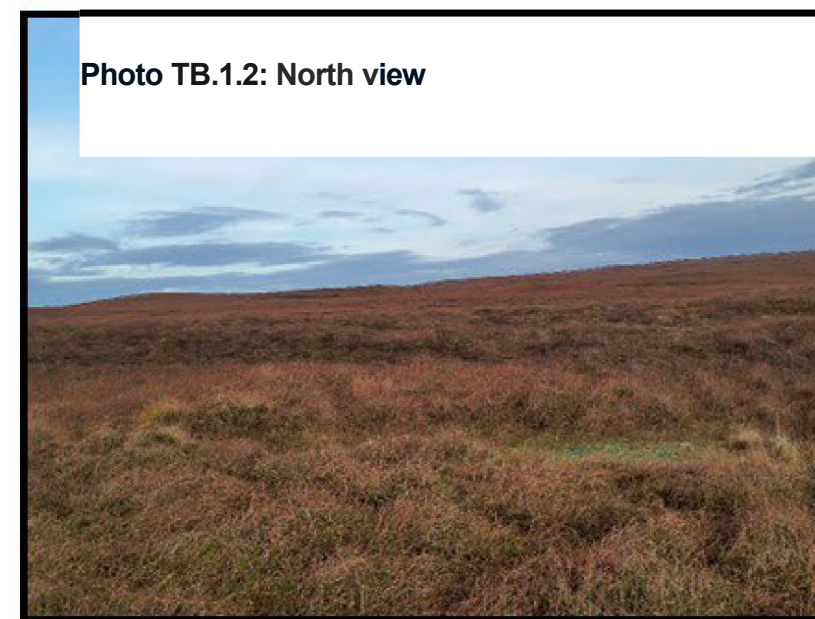
Turbine location moved northwest to reduce potential impacts upon Near-Natural blanket bog.

Plate 8.1: Proposed Turbine Location T8 - Repositioned To avoid pools

Photo T8.1.1: Quadrat



Photo TB.1.2: North view



Proposed Turbine Location TS:

Vegetation: M19 blanket bog with a thick thatch of hare's-tail cottongrass and heather. There was some cross-leaved heath and crowberry also present.

Moss layer: Very little moss overall as the vegetation was dense. Some *H. splendens* and a very small amount of *Sphagnum*-moss recorded.

Evidence of modification: Sheep track clear in north transect. The vegetation was dry underfoot and dominated by a thick thatch of heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/drainage features: North transect had two drains. South transect had six erosion features that were largely vegetated.

Pools: Frequent pools of water, though many were simply water on bare peat. Occasional M2 pools.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally absent in places and did not form a continuous layer. Vegetation made up of thick, hare's-tail cottongrass and heather. Occasional pools with *S. cuspidatum* though most were water pooling on bare peat.

Photo TS.1.3: South view

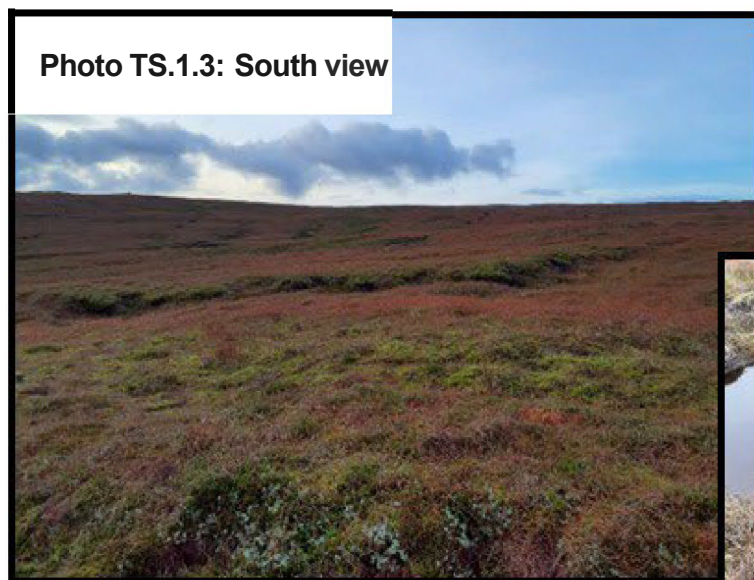


Photo T8.1.4: Thatch of vegetation with little moss present



Photo TB.1.5: Water pooling on bare peat

Plate 9: Proposed Compound Location C1



Proposed Compound Location C1:

Vegetation: Tussocky M17b vegetation dominated by common cottongrass over heather. A little crowberry and cross-leaved heath were also present.

Moss layer: Moss layer restricted due to thick vegetation. Occasional *Sphagnum*-mosses and *R. fanuginosum* in small patches. Lichens were common. *S. capillifolium* hummocks present in vicinity with round-leaved sundew.

Evidence of modification: Sheep trails were visible in the area. The vegetation was dominated by a thick thatch of heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: Erosion gully present in north and south transect.

Pools: There were several small pools and damper areas.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was generally dry. *Sphagnum*-mosses were patchy and did not form a continuous layer. Vegetation made up of dense heather and hare's-tail cottongrass.

Plate 10: Proposed Compound Location C2



Photo C24: Patches of *S. capillifolium*.



Photo C25: Some micro-erosion in south transect

Proposed Turbine Location C2:

Vegetation: lull 1'7b blanket bog dominated by thick dense neatner and common cottongrass. A little tormentil and round-leaved sundew present.

Moss layer: Dominated by *R. lanuginosum* with lichens, but patches of *S. capillifolium*.

Evidence of modification: The vegetation was dominated by a thick thatch of heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: A small depression present in the south transect.

Pools: A pool present in the north transect.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were patchy and do not form a carpet. Vegetation made up of dense common cottongrass and heather.

Plate 11: Proposed Compound Location C3



Proposed Turbine Location C3:

Vegetation: M 17b vegetation with common cottongrass, hare's-tail cottongrass and heather. Occasional butterwort, bog asphodel; and round-leaved sundew. Dry underfoot

Moss layer: Moss layer dominated by *S. capillifolium*, but patchy, not a carpet. *R. lanuginosum* and *lid1ens* common.

Evidence of modification: Dense heather and cottongrass which is indicative of long-term grazing pressure.

Erosion/ drainage features: No drains or erosion features in transects.

Pools: Two pools in north transect including a large one. Pools were fairly common around the location.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally patchy and did not form a continuous layer. Dense vegetation of heather and cottongrasses. However, pools fairly common. Some localised activity possible around some pools where *Sphagnum*-mosses common.

Compound location moved and reduced in size to reduce potential impacts upon pools.

Plate 12: Proposed Road Location R1

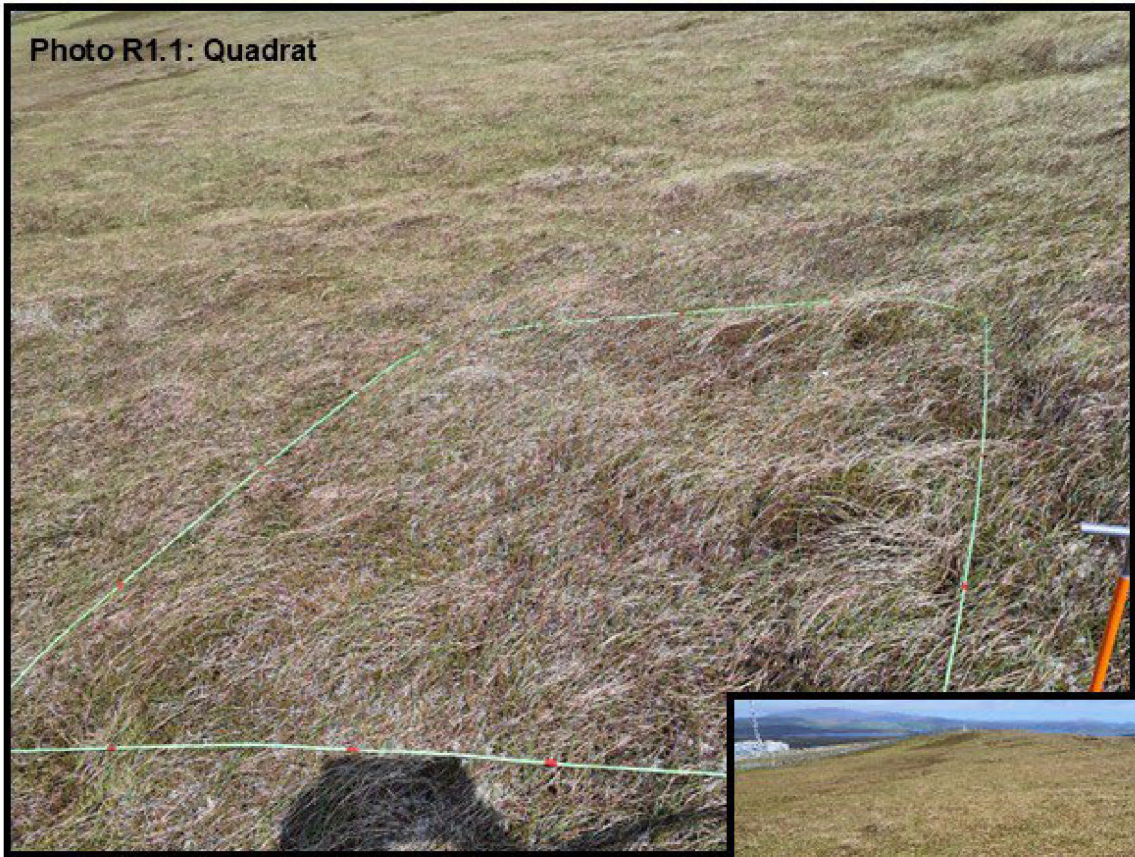


Photo R1.2: North view

Photo R1.3: South view

Photo R1.4: Sheep trail.

Photo R1.5 Bog pool at end of north transect

Proposed Turbine Location R1

- Vegetation** M17b blanket bog dominated by common cottongrass with heather and lisdens. Dry underfoot and dense vegetation.
- Moss layer:** Very little mosses present. Small amount of *S. capillifera* recorded in quadrat.
- Evidence of modification:** Sheep trails were evident in the vegetation and dense heather and cottongrass which is indicative of long-term grazing pressure.
- Erosion/ drainage features:** Single drainage feature in south transect.
- Pools:** Small bog pool present at end of north transect.
- Evidence for active peat formation:** Area unlikely to be normally actively forming peat. Ground surface was dry. Sphagnum-mosses were either absent or patchy and did not form a continuous layer. Vegetation made up of thick, dense common cottongrass and heather. Some localised activity possible around some pools where *Sphagnum*-mosses common.

Plate 13: Proposed Borrow Pit Location BP1



Proposed Turbine Location BP1:

Vegetation: M17b blanket bog with dense common cottongrass and heather. Dry underfoot

Moss layer: Hummocks of *S. capillirifolium* present in area, including in quadrat. Patchy.

Evidence of modification: Tussocky, species poor common cottongrass dominated vegetation indicative of long-term grazing pressure.

Erosion/ drainage features: A single drain in the south transect.

Pools: No bog pools or surface water present in vicinity.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally patchy and did not form a continuous layer. Vegetation made up of thick common cottongrass with heather.

Borrow pit location was removed from the design layout

Plate 14: Proposed Borrow Pit Location BP2



Proposed Turbine Location BP2:

Vegetation: Area included a mixture of dry heath and dry modified bog. Quadrat taken in patch of representative bog vegetation, M17b. It was dominated by thick, dense common cottongrass with heather.

Moss layer: Mosses restricted due to dense vegetation. Mixture of *H. splendens* and *S. capitatum* in patches.

Evidence of modification: Peat cuttings evident in north transect. Dense heather and cottongrass dominated vegetation indicative of long-term grazing pressure.

Erosion/drainage features: Single erosion feature in north transect.

Pools: No bog pools in vicinity.

Evidence for active peat formation: Area unlikely to be normally actively forming peat. Ground surface was dry. *Sphagnum*-mosses were generally patchy and did not form a continuous layer. Dense vegetation of cottongrasses and heather.

Plate 15: Example of Near Natural blanket bog N1



Example of M17b blanket bog in Near-Natural condition:

Vegetation: Location selected to demonstrate M17b blanket bog in a Near-Natural condition. Vegetation was made up of a fairly open and even mix of heather, hare's-tail cottongrass, common cottongrass and deergrass with moss-leaved heather. Common sedge and carnation sedge also present with round-leaved sundew. Damp underfoot.

Moss layer: Moss layer was patchy but include *S. papillosum* as well as *S. capillifolium*. There was also a little *S. mspidatum*. Lichens were common

Evidence of modification: There was evidence of sheep, including dung, trails and a skull.

Erosion/ drainage features: One drainage ditch was in the north transect.

Pools: Frequency pools with feathery bog-moss in them. Hummock hollow formation was clearly present.

Evidence for active peat formation: Area has potential to be actively forming peat when climate conditions are suitable. Wet underfoot, with many pools. Sphagnum-mosses were fairly abundant including *S. papillosum*.

Plate 16: Example of Near Natural blanket bog NN2

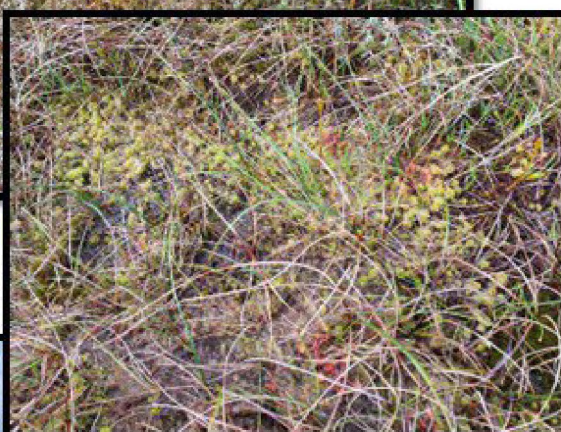


Photo NN2.4 Round-leaved sundew, a mixture of *Sphagnum* species.



Photo NN2.5: Pools filled with *Sphagnum*-mosses were common.

Example of M17b blanket bog in Near-Natural condition:

Vegetation: Location selected to demonstrate M17b blanket bog in a Near-Natural condition. Vegetation was made up of a more open and even mix of heather, hare's-tail cottongrass, common cottongrass and deergrass with cross-leaved heath. Bog asphodel was frequent. Common sedge and carnation sedge also present with round-leaved sundew. Damp underfoot.

Moss layer: Dominated by *Sphagnum* species. Five *Sphagnum* species recorded in quadrat including *S. papillosum*, *S. cuspidatum* and *S. tenellum*.

Evidence of modification: Little evidence of modification.

Erosion/ drainage features: None in vicinity.

Pools: Frequency pools with a mixture of *Sphagnum*-mosses in them. Hummock hollow formation was clearly present.

Evidence for active peat formation: Area has potential to be actively forming peat when diامate conditions are suitable. Wet underfoot, with many pools. *Sphagnum*-mosses were abundant and there was a mixture of species.

Vegetation Assessment of proposed Development Footprint, Neshion Energy Park

Location	Date	Grid reference	NVC	% CV	% CC	% HTC	% Forbs	% graminoids	% Sphag	% other mosses	% lichens	No. of species	Dung present?	Hooves marks?	% Bare peat	CV height (cm)	Sphag depth (cm)
T1	Jun-25	HU 41186 76655	M17b	30	60	20	0	80	1	25	0	6	N	N	0	14.5	2.0
T2	Jun-25	HU 41167 77122	M17b	50	50	5	0	57	2	25	30	11	Y	y	1	7.3	2.0
T2	Dec-25	HU 41176 77174	M17b	40	40	15	0	57	15	0	10	8	N	N		12.2	2.0
T3	Jun-25	HU 41197 77643	M17b	30	60	10	3	73	12	2	15	14	Y	N	0	8.5	2.3
T4	Jun-25	HU 41634 78058	M17b	30	50	20	3	70	20	6	10	14	N	N	0	6.7	5.6
T5	Jun-25	HU 41859 77604	M17b	40	70	5	3	75	25	0	5	9	Y	N	0	11.7	3.5
T6	Jun-25	HU 41946 77067	M17b	30	40	0	0	55	4	60	35	11	Y	N	1	9.0	2.0
T6	Jun-25	HU 42347 76773	M17b	40	80	0	10	85	3	45	0	13	Y	N	0	13.8	2.3
T8	Jun-25	HU 41721 76351	M17b	40	60	5	3	65	31	5	15	10	Y	N	0	7.0	2.7
T8	Dec-25	HU 41833 76490	M19	40	10	60	0	70	1	7	0	8	N	N	0	20.3	2.0
C1	Jun-25	HU 41520 75322	M17b	25	60	0	0	60	8	9	35	13	N	N	0	13.3	4.3
C2	Jun-25	HU 41603 75240	M17b	40	50	0	4	56	5	20	20	10	N	N	1	7.7	2.8
C3	Jun-25	HU 41139 76883	M17b	40	40	30	4	70	26	10	10	11	Y	N	0	8.7	4.2
R1	Jun-25	HU 41588 75976	M17b	40	60	0	0	60	3	3	10	8	N	N	0	8.8	3.0
BP1	Jun-25	HU 41512 75776	M17b	50	50	5	1	55	41	5	2	10	N	Y	0	10.3	4.7
BP2	Jun-25	HU 41643 74501	M17b	30	80	5	0	86	15	13	0	10	N	N	0	12.0	2.0
Mean for the Development Footprint				37	54	11	2	67	13	15	12	10	-	-	0	11	3
NN1	Jun-25	HU 42039 76796	M17b	30	20	5	1	33	37	22	25	16	N	N	0	7.0	5.5
NN2	Jun-25	HU 41714 76510	M17b	25	20	5	13	32	53	12	20	19	N	N	1	6.5	4.3
Mean for Near-Natural bog				28	20	5	7	33	45	17	23	18	-	-	1	7	5

Table 2: Summary of Quadrat Data Collected at Proposed Development Footprint Locations (December 2025). CV = Heather, CC = CC =Common Cottongrass, HTC = Hare's-tail Cottongrass, Sphag = Sphagnum Mosses.

Loc atio n	Dat e	Transect direction	Vegetatio n cover (%)	Bare peat cover (%)	Rock cover (%)	Water cover (%)	Erosion gullies present	Drains presen t	Pools presen t
T1	Jun -25	N	98	2	0	0	2	n	n
T1	Jun -25	S	99	1	0	0	1	n	n
T2	Jun -25	N	94	0	0	6	n	n	2
T2	Jun -25	S	100	0	0	0	1	n	0
T2	De c- 25	N	92	1	0	7	1	0	2
T2	De c- 25	S	95	0	0	5	1	0	0
T3	Jun -25	N	94	0	0	6	n	n	2
T3	Jun -25	S	99	1	0	0	n	n	0
T4	Jun -25	N	98	0	0	2	1	0	0
T4	Jun -25	S	98	0	0	2	0	0	1
T5	Jun -25	N	100	0	0	0	0	0	0
T5	Jun -25	S	100	0	0	0	0	0	0
T6	Jun -25	N	88	2	0	10	y	n	y
T6	Jun -25	S	88	4	0	8	n	n	y
T7	Jun -25	N	100	0	0	0	y	n	y
T7	Jun -25	S	100	0	0	0	n	n	n
T8	Jun -25	N	100	0	0	0	0	1	0
T8	Jun -25	S	100	0	0	0	0	0	0
T8	De c- 25	N	95	0	0	5	n	2	5
T8	De c- 25	S	99	0	0	1	6	0	0
C1	Jun -25	N	92	0	0	8	1	0	2
C1	Jun -25	S	94	2	0	4	1	0	2
C2	Jun -25	N	99	0	0	1	n	n	1
C2	Jun -25	S	96	4	0	0	y	n	0
C3	Jun -25	N	88	0	0	12	0	n	2
C3	Jun -25	S	92	0	0	8	0	0	0
R1	Jun -25	N	96	0	0	4	n	n	1
R1	Jun -25	S	100	0	0	0	n	1	n
BP1	Jun -25	N	100	0	0	0	0	0	0

Location	Date	Transect direction	Vegetation cover (%)	Bare peat cover (%)	Rock cover (%)	Water cover (%)	Erosion gullies present	Drains present	Pools present
BP1	Jun-25	S	100	0	0	0	0	1	0
BP2	Jun-25	N	98	2	0	0	1	0	0
BP2	Jun-25	S	99	1	0	0	0	0	0
Mean for Development Footprint			96	1	0	3			
NN1	Jun-25	N	72	0	0	28	0	0	10
NN1	Jun-25	S	76	0	0	24	0	0	8
NN2	Jun-25	N	68	0	0	32	0	0	9
NN2	Jun-25	S	80	0	0	20	0	0	5
Mean for Near-Natural bog			74	0	0	26			

Table 3: Transect Data collected at Proposed Development Footprint Locations (December 2025).

Summary of Quadrat and Transect Results

The data presented from the quadrat and transect survey gives a representative sample of the vegetation potentially impacted by the Proposed Development Footprint. Using quadrat data to consider vegetation is a well-known and well used techniques. For example, the entire NVC is based on quadrat data. Two samples were also taken in Near-Natural blanket bog for comparative purposes.

The data demonstrates that the majority of the Proposed Development Footprint was on M17b blanket bog. It was usually dominated by common cottongrass, with the average amount being 54% compared to only 20% in the Near-Natural blanket bog. In the single quadrat that had a low amount (10%) of common cottongrass, there was a high proportion (60%) of hare's-tail cottongrass (and was M19). Overall graminoid cover was 67% for the quadrats in the Development Footprint, compared to 33% for the Near-Natural blanket bog.

Sphagnum cover was only an average of 13% in the quadrats at the Proposed Development Footprint, with an average depth of 3 cm. This demonstrates patchy *Sphagnum* cover which was restricted due to the dense graminoids. The Near-Natural blanket bog had an average of 45% cover of *Sphagnum* and was deeper (average of 5 cm).

The quadrats in the Proposed Development Footprint had an average of 10 species recorded, demonstrating a species poor habitat. The Near-Natural blanket bog had an average of 18 species recorded in a quadrat.

The transect data demonstrate that across the Proposed Development Footprint there was an average of 96% vegetation in the transects, with small amounts of water (usually pools) and bare peat being present. The Near-Natural blanket bog had an average of 26% water in the transects, demonstrating a much higher proportion of surface water, than was in the Modified bog in the Proposed Development Footprint.

Consideration of Peat Formation

Blanket bog activity is the formation of peat when plant material does not decompose due to water-logged conditions.

The data collected from the vegetation assessment has been considered using the PCA Support Tool which describes if a bog is likely to be actively forming peat or not (Glenk *et al.* 2017). These considerations are transparently presented in **Table 4** for both the vegetation along the Proposed Development Footprint, and the Near-Natural blanket bog.

Using the PCA Support Tool the blanket bog in the around the Proposed Development Footprint was considered to best fit into the 'Intermediate' categories of bog and the Near-Natural blanket bog was in 'Good' condition. Good bog according to Glenk and co-workers (2017), is likely to be active.

Intermediate bog according to Glenk and co-workers (2017), is unlikely to be active. Therefore, all of the M17b and M19 around the Proposed Development Footprint would be judged to have stopped being active although it could be a carbon store. Given the dry bog surface, the high density of common cottongrass, hare's-tail cottongrass and heather and the lack of usual bog species, particularly *Sphagnum*, it was considered unlikely that the vegetation would be normally actively forming peat.

According to Anderson (2022) *Sphagnum* mosses are the most important peat-forming plant contributing c. 99.5% of the material reaching the catotelm (the lower peat horizon below the active acrotelm in which the plants sit). Given the lack of *Sphagnum* species in the bog around the development Footprint, it is considered unlikely that there was active peat formation.

However, the PCA support tool is a broad-brush, subjective tool, and does not take into account subtleties and variation within the blanket bog. The IUCN UK Committee Peatland Programme Briefing Notes (Lindsay, 2014a-c) give details on peatland condition and activity and describe that much of the blanket bog in the UK is likely to be in a degraded state with weak or very limited peat formation activity. They give a less binary view of activity and describe blanket bog that has been degraded through on-going modification such as found within the Study Area as "*some areas of bog remain active*" with "*weak peat formation*". Given the lack of surface water-logging, and the conditions described, overall, it is considered that the blanket bog along the Development Footprint is likely to be largely inactive, with some activity possible/likely in the relatively limited, wetter locations around pools where there are peat forming *Sphagnum* species present.

Signs	Good	Intermediate	Bad	Development Footprint	Photos of Development Footprint	Near-Natural bog Comparison	Photos of Near-Natural blanket bog
Water	Plenty of water visible on the surface.	Surface water is rarely visible.	Deep gullies have formed from wind and water erosion.	Surface water was present across the Proposed Development Footprint usually in small pools. These were often (but not always) water pooling on bare peat. Note the survey was conducted in June 2025 after a spell of heavy rain. The average amount of water in transect data for the Proposed Development Footprint was 3%. 'Intermediate'.	 Water over bare peat.	Surface water common in the Near-Natural blanket bog. There were frequent pools, usually joining together with a high abundance of Sphagnum mosses. The average amount of water in transect data for Near-Natural bog was 26%. 'Good'.	 Water was common in the Near-Natural bog.
Vegetation	Small grasses, <i>Sphagnum</i> mosses common and very wet.	Taller plants, such as cottongrasses and heather.	Rarely any plants grow on the areas that are exposed. Patches of grasses or heather are still found on 'islands' in between exposed bare peat.	The majority of the vegetation was dominated by thick, dense common cottongrass with heather some hare's-tail cottongrass. Graminoid cover averaged 67%. <i>Sphagnum</i> mosses were restricted in extend and species. <i>R. lanuginosum</i> and <i>H. splendens</i> were common. There was usually little exposed peat. It was usually dry underfoot. 'Intermediate'.	 Vegetation was dominated by dense common cottongrass with heather	The vegetation in the Near-Natural bog open and even mix of heather, hare's-tail cottongrass, common cottongrass and deergrass with cross-leaved heath. <i>Sphagnum</i> mosses were common (average of 45% cover) in extend and species. It was damp underfoot. 'Good'.	 Damp, open vegetation in Near-Natural bog.
Bare peat	Little to no bare peat patches.	Bare peat patches are occasional, burning may occur.	Bare peat areas will continue to expand, leaving less plant cover as protection on the surface. Peat will continue to be lost until the solid rock is exposed.	Bare peat patches were occasional along the Proposed Development Footprint. Averaged 1% in transects. These were usually small erosion features or peat cuttings. Burning may have occasionally occurred at one time. 'Intermediate'.	 Erosion features occasional seen.	Little to no bare peat patches in the Near-Natural blanket bog.	
Water quality	Water flowing from good quality peatland is clear.	Water flowing from peatland likely to be slightly brown, especially after heavy rainfall.	Bad quality, it can be dark brown from the peat content.	Water coming from the bog was brown in colour. 'Intermediate'.		Water coming from the bog was brown in colour. 'Intermediate'.	
Wildlife	Good for wildlife.	Wildlife less abundant than in good condition.	Home to little wildlife.	Specialist blanket bog species, such as dunlin were recorded within Study Area. Dunlin are associated with bog pools. Sheep were also common across the Study Area. 'Good' - 'Intermediate'.	 Evidence of sheep rubbing against peat cutting.	Specialist blanket bog species, such as dunlin were recorded within the Study Area and area associated with high-quality blanket bog. See Chapter 7: Ornithology (EIAR Volume 2) for details. 'Good' - 'Intermediate'.	

Table 4: Evaluation of the Peatland Quality within the Study Area, Based on the PCA Support Tool Criteria.

Consideration of Natural Surface Patterns

Near-natural bog is clearly described by Lindsay (1995) and in the IUCN briefing notes (Lindsay *et al.*, 2014a,b). The reference of Lindsay (1995) is of particular relevance as it was this that informed the SSSI selection process for blanket bog across the UK (and Scotland).

Lindsay (2014) describes bogs as “*a particular type of wetland which are waterlogged only by direct rainfall*”. Near-natural bogs have two layers, the peat forming vegetation (the acrotelm) and the peat store (the catotelm).

In near-natural, fully functioning bogs, the vegetation is dominated by peat forming, wetland species such as *Sphagnum* mosses and an open cover of cottongrasses. As well as peat-forming species, the surface of a Near-Natural bog characteristically displays small-scale surface patterning termed ‘micro-topography’. This patterning can be seen as a series of hummocks, lawns and hollows across the surface of the blanket bog, with different *Sphagnum* species occupying different zones of the micro-topography in relation to the water table.

Figure Insert 1 indicates that, according to Lindsay (2014b), the location in which the Proposed Development is set would likely be between 1a and 1b category of Near-Natural blanket bog if in a natural state where both hummocks and hollows would be common and there would be vigorous peat formation. This is quite difficult to see in this insert, and does not focus in on Shetland. However, based on the Near-Natural bog seen within the Study Area and the descriptions of nearby designated sites with blanket bog as qualifying features category 1a-1b is considered appropriate.

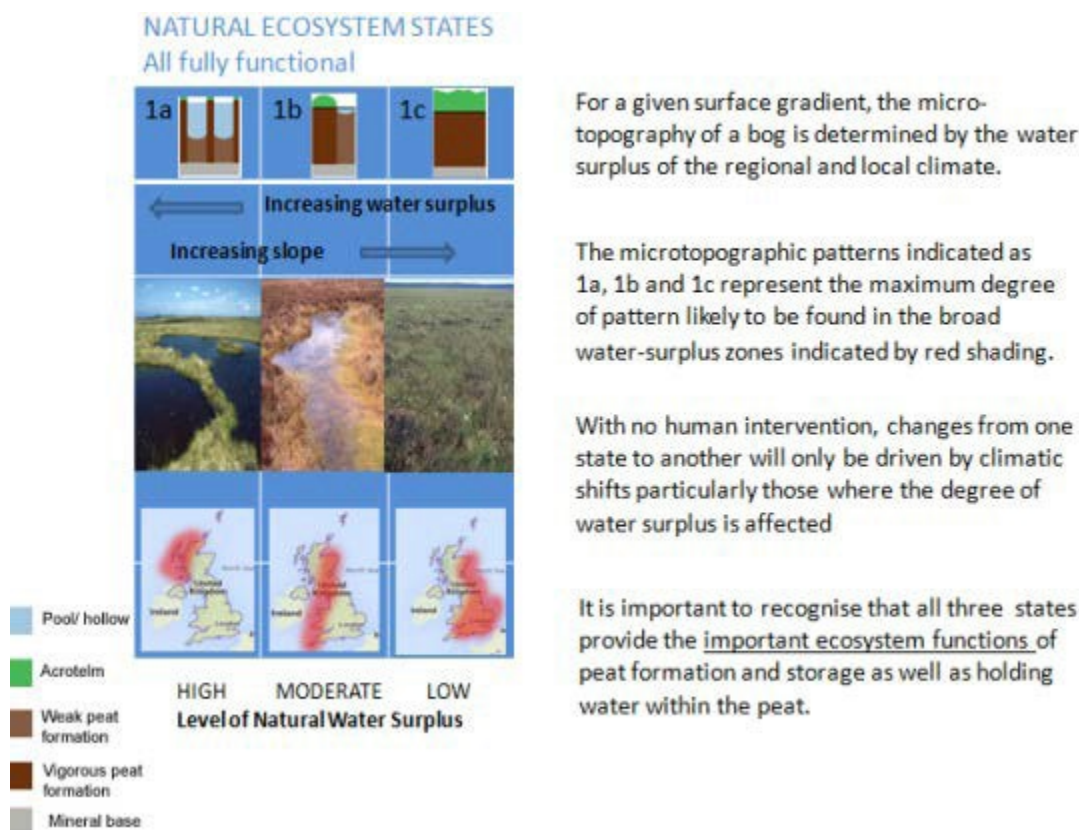


Figure Insert 1: Natural surface patterns taken from Lindsay 2014b.

Figure Inset 2 gives a diagrammatic representation of the degradation of blanket bog from a Near-Natural state to one of a fully degraded ecosystem.

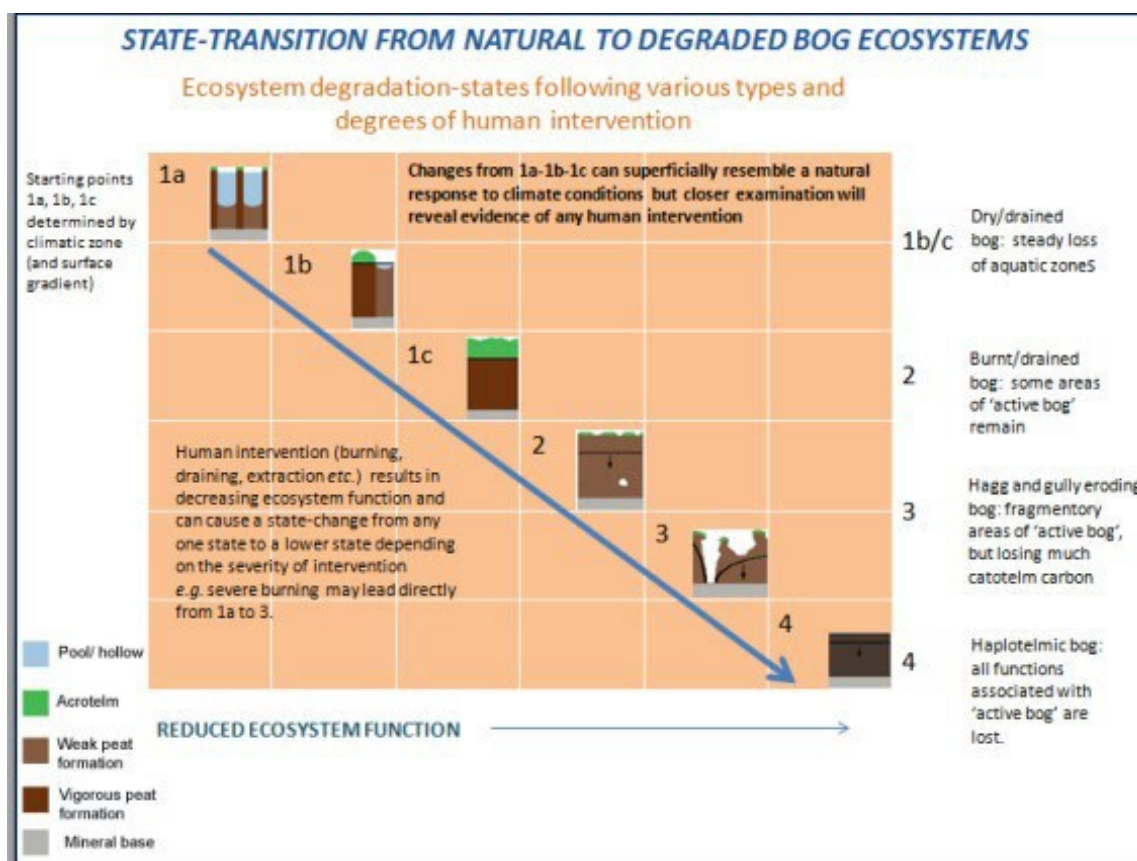


Figure Inset 2: Transition from natural to degraded bog, taken from Lindsay 2014b.

The vegetation at the Proposed Development Footprint did not display a natural surface pattern. It was modified through grazing, possibly historic burning and draining. This resulted in a generally dry surface pattern with dense graminoids and heather and little in the way of *Sphagnum* species. Pools were relatively common (c. 3% of transects), but many were simply water on top of bare peat after recent rains rather than ecologically important bog pools.

Based on the evidence presented in this report, the vegetation in and around the Proposed Development Footprint is not considered to have a natural surface pattern but a modified surface pattern. The Near-Natural blanket bog was considered to have a natural surface pattern.

Consideration of SSSI Selection Criteria

Following NatureScot guidance (2023, updated 2026), the data collected from the Development Footprint has been considered in relation to key aspects of the SSSI selection criteria (JNCC, 1994) in **Table 5**.

Based on the evidence collected in June and December 2025, the vegetation within the Proposed Development Footprint does not meet the SSSI selection criteria.

SSSI Selection Criteria (Paragraph Number)	Information from the Proposed Development Footprint at Neshion	Criteria Met?
3.4 To help prioritise sites above the minimum standards of size and peat formation capability (section 3.5), there are certain general features which indicate the most natural sites, which may be assumed to have the greatest quality. 1. Parts of the original lagg fen still present (in raised bogs particularly); 2. In raised bogs, a high proportion of the original central dome sill physically intact; 3. Low frequency of drains and peat-cuttings; 4. Presence of plant species indicating peat formation capability and/or lack of disturbance, notably <i>Sphagnum pulchrum</i>, <i>S. fuscum</i>, <i>S.imbricatum</i>, <i>S. balticum</i>, <i>S. magellanicum</i>, <i>Dicranum bergeri</i>, <i>Rhynchospora alba</i>, <i>R. fusca</i>, <i>Drosera anglica</i>, <i>Carex limosa</i>, <i>C.magellanica</i> (= <i>C. paupercula</i>) and locally <i>Schoenus nigricans</i>. Other component species are described in Annex 1. 5. An area of natural surface pattern (as defined in 3.1.4) within the mire expanse; 6. Absence of invasion by woodland or scrub, though some high quality sites may contain trees and scrub with a bog bryophyte floor. There should be a presumption toward selection of any site exhibiting two or more of these characteristics. Furthermore, this presumption should apply to all sites above the minimum standards of size and peat formation capability (section 3.5).	The majority of the blanket bog in and around the Proposed Development Footprint was in a highly modified state, dominated by purple moor-grass with hare's-tail cottongrass. <i>Sphagnum</i> mosses were generally absent or rare. The surface was usually dry. 1. N/A – No lag fen present within the Development Footprint or the wider Study Area. 2. N/A – No raised bog within the Development Footprint or the wider Study Area. 3. Drainage ditches, peat cuttings and erosion features were all present in the peatland habitat within the Study Area and are reported in Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 4). Many of these features were recorded within the transect data (Table 3). In addition, M6 flushes were very common. Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 4) states that the M6 flushes “were thin seepage lines of vegetation. Some were considered likely to be natural, although some/many were likely to be infilled historic drainage ditches”. These were common around the Proposed Development Footprint. The only location that did not have these features either mapped or noted in the transect data was T2 and the nearby compound. However, there is an existing road within c. 75 m of these elements. 4. None of these species were recorded within the quadrats or wider Study Area. 5. There was no evidence of a natural surface pattern. 6. There was an absence of invasion by woodland or scrub species.	The vegetation characteristics within the Proposed Development Footprint do not match any two of these specified SSSI criteria.
3.5 Raised bogs larger than 10ha and blanket bogs larger than 25ha should be considered for SSSI status in all parts of Britain if capable of forming peat. Smaller raised bog sites of high quality may be selected in Areas of Search where few or no larger sites remain (Bold is my emphasis).	There are two main relevant considerations for this selection criteria (note, raised bog habitat is not present so irrelevant in the Study Area context). Firstly, that the blanket bog should be >25 ha and secondly that it should be actively peat forming.	The vegetation characteristics within the Proposed Development Footprint do not match these SSSI criteria.

SSSI Selection Criteria (Paragraph Number)	Information from the Proposed Development Footprint at Neshion	Criteria Met?
	There was more than 25 ha of blanket bog around the Proposed Development Footprint and more widely in the Study Area. The majority of the Study Area was blanket bog. The likelihood of the bog around the Proposed Development Footprint being active has been considered above. It was considered unlikely to be actively forming peat. All areas of Near-Natural blanket bog which may be actively forming peat have been deliberately avoided by design.	
6.1 Blanket bog is a type which should be represented by the selection of exemplary sites showing the full range of ecological variation.	There was little ecological variation with the M17b around the Proposed Development Footprint. It was typically characterised by dense common cottongrass, with heather and hare's-tail cottongrass. It was generally species poor. There were pools present, but these were often bare peat with water in them. All areas of Near-Natural blanket bog have been deliberately avoided by design.	The vegetation characteristics within the Proposed Development Footprint do not match these SSSI criteria.
6.5 (part 2) Blanket bog mesotopes showing any of the following microtopic and vegetation features are near-natural and of high quality. Subject to the minimum standard so size and peat formation capability set out above, there should be a presumption towards the selection of sites which contain: 1. An abundance of <i>Sphagnum</i>-rich ridges (T1) 2. An abundance of <i>Sphagnum</i>-rich ridges (T2) 3. Ridges of <i>Sphagnum</i> - <i>Betula nana</i> (T2) 4. Bryophyte hummocks of <i>Sphagnum fuscum</i> or <i>S. imbricatum</i> (T3/2) 5. Peat mounds (T5) 6. Hollows of <i>Sphagnum</i> or bare peat-<i>Rhynchospora fusca</i> (A2)	It should be noted that the microforms referred to in this section are not clearly represented within the NVC. The NVC provides "<i>a summary of plant communities at the site level, but its vegetation units are not intended to be used in defining the intricate finer scale mosaics of patterned surfaces</i>" (Lindsay, 1995). Microforms were considered in the vegetation assessment undertaken in June and December 2025. 1. An abundance of <i>Sphagnum</i> rich ridges (T1) were not recorded within the Proposed Development Footprint or in the wider Study Area, except around the Near-Natural bog where <i>Sphagnum papillosum</i> was common. The Near-Natural bog has been deliberately avoided by the design. 2. An abundance of <i>Sphagnum</i> rich ridges (T2) were not recorded within the Proposed Development Footprint. <i>S. capillifolium</i> was limited to small patches. This is except around the Near-Natural bog where <i>S. capillifolium</i> was common. The Near-Natural bog has been deliberately avoided by the design. 3. <i>Betula nana</i> dwarf birch was not recorded within the Proposed Development Footprint or in the wider Study Area. 4. <i>S. imbricatum</i> and <i>S. fuscum</i> were not recorded within the Proposed Development Footprint or in the wider Study Area.	The vegetation characteristics within the Development Footprint do not match these SSSI criteria.

SSSI Selection Criteria (Paragraph Number)	Information from the Proposed Development Footprint at Neshion	Criteria Met?
	5. Peat mounds were not recorded within the Proposed Development Footprint or in the wider Study Area. 6. Hollows of <i>Sphagnum</i> or bare peat- <i>Rhynchospora fusca</i> were not recorded within the Proposed Development Footprint or in the wider Study Area. Hollow with a mixture of <i>Sphagnum</i> species were recorded in the Near-Natural bog which was deliberately avoided by the design.	

Table 5: Assessment of the Blanket Bog within the Development Footprint in Relation to the SSSI Selection Criteria.

NatureScot Site Visit Template

NatureScot's peatland guidance provides an excel spreadsheet entitled 'Site visit template for the assessment of peatland on proposed development sites'. This Site Visit Template gives binary 'yes/no' questions relating to peatland habitats. It has been filled in based on the evidence provided in this document. However, it should be noted that questions such as "*Blanket bog support vegetation capable of peat forming? – yes/no*" are usually rather more complex than a 'yes/no' answer can provide as peat formation is based on a variety of conditions including species composition, water table, surface water conditions, grazing pressure and climate. In addition, some of the 'indicator species' that NatureScot base part of their template assessment on, such as *S. fuscum*, are not necessarily only found in near-natural conditions and so their use in this context can also be erroneous (e.g. Massey, 2022). However, this Site Visit Template has been filled in for completeness and is shown in **Table 6**. This document provides the basis for transparent, robust and evidence-based assessment of the queries within the Site Visit Template.

Vegetation Assessment of proposed Development Footprint, Neshion Energy Park

Neshion				as shown in ES	as measured during NaturScot site visit	Raised bog present supporting typical bog vegetation	Montane bog present supporting typical bog vegetation	Within a continuous unit of blanket bog (>25ha)	Blanket bog support vegetation capable of peat forming	Few drains/peat cutting?	Peat forming spillover disturbance?	Natural surface pattern?	absence of invasion by woodland/scrub?	Abundant Sphagnum ridges	Sphagnum-B nana ridges	S. fuscum or S. austriaci hummocks?	Peat Mounds?	Rhynchos fusa?	
						Yes is good Likely national	Yes is good Possible national interest	Yes is good	Yes is good	Yes is good Two or more yes = possible national interest				Rare features. Yes is very good. No is neutral One or more yes = possible national interest					
Infrastructure assessed label	Easting	Northing	NVC	depth >50 cm = carbon rich soil		No -> check for other type of bog	No -> check for other type of bog	No -> advise on mitigation measures		No -> check rare features				No -> advise on mitigation measures					assessment result
e.g. Turbine 1	123456	654321	M18	85	100	No	No	Yes	Yes	No	Yes	No	Yes	Yes	No	No	No	No	possible national interest
e.g. Track section X	854321	123456	M15	45	40	No	No	No	Yes	No	No	No	Yes	No	No	No	No	No	Not a national interest
e.g. borrow pit A	987561	125367	H12	35	30	No	No	No	No	No	No	No	No	No	No	No	No	No	Not a national interest
T1	441188	117663	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T2	441167	1177132	M17b			No	No	Yes	Unlikely	Yes	No	No	Yes	No	No	No	No	No	Not a national interest
T3	441176	1177174	M17b			No	No	Yes	Unlikely	Yes	No	No	Yes	No	No	No	No	No	Not a national interest
T4	441197	1177643	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T5	441634	1178068	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T6	441859	1177604	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T7	441946	1177067	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T8	441847	1176773	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T9	441723	1176351	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
T10	441833	1176490	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
C1	441520	1175322	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
C2	441603	1175240	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
C3	441139	1176883	M17b			No	No	Yes	Unlikely	Yes	No	No	Yes	No	No	No	No	No	Not a national interest
R1	441588	1175976	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
BP1	441522	1175776	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest
BP2	441643	1174501	M17b			No	No	Yes	Unlikely	No	No	No	Yes	No	No	No	No	No	Not a national interest

Table 6: Extract from NatureScot's Site Visit Template for the Assessment of Peatland for the Development Footprint.

Discussion and Conclusion

NatureScot guidance (2023, updated 2026) states that they may object to proposed developments if the peatland habitats are considered, by NatureScot, to meet SSSI selection criteria and be of ‘*high quality and in a near-natural condition*’. However, it should be noted that “*the majority of the UK peatbog habitat is currently in a state of degradation or recovery. Very little is in a state which can be regarded as ‘near pristine’. Consequently the likelihood is that, when looking at a peat bog system, it will be a system which is in degradation state ... This should be taken as the default position until closer examination is able to prove otherwise*” (Lindsay *et al.* 2014b).

NatureScot provide a binary tick box exercise for consideration (by their staff) for each turbine location in the form of a ‘Site Visit Template’ and an excel spreadsheet. There is no accompanying methodology or objective evidence-led approach provided for staff to follow to allow the ‘Site Visit Template’ to be systematically completed nor is there guidance on the level of relevant experience required to complete the ‘Site Visit Template’, undermining its use for transparent assessment purposes. Consequently, this vegetation assessment of the proposed turbine locations for the Proposed Development has been provided, using a transparent, repeatable and robust evidence-led approach with the use of specially targeted quadrat and transect data, to allow assessment of whether the vegetation within the Proposed Development Footprint is likely to be active blanket bog vegetation, meets the SSSI selection criteria and consequently whether it is considered, on the basis of evidence, to be of the highest quality or not.

The Proposed Development Footprint was visited, and the vegetation present was systematically reported on in 2025, providing up to date, detailed and robust empirical data for consideration and assessment. Due to careful and deliberate design, the vegetation at the turbine locations was not blanket bog in Near-Natural condition (which had been deliberately avoided), but blanket bog in a modified condition. This was demonstrated by comparing the data of Near-Natural bog to the data along the Proposed Development Footprint.

Impacts from current and historic land management practices were evident, including sheep grazing, drainage, peat cutting and potentially historic burning.

The peatland habitat potentially impacted by the Proposed Development Footprint is M17b and M19. Based on NatureScot guidance, these vegetation types have the potential to be classed as being of National Interest. However, key aspects, such as likely peat formation, natural surface patterning, indicator species and features of near natural condition were considered in detail. Whilst the Near-Natural bog within the Study Area demonstrated these features, the blanket bog along the Proposed Development Footprint did not.

As shown in **Table 5** the vegetation within the Proposed Development Footprint did not meet the SSSI selection criteria and is not considered to be of the highest quality. This assessment is also supported by the Phase 1 and NVC survey and the detailed PCA undertaken more widely across the Study Area (**Technical Appendix 6.2: Habitat Survey Report (EIAR Volume 2)**).

Some pools are likely to be lost by the Proposed Development Footprint. Many of these were simply temporary standing water over bare peat, but some would be defined as M2 or M3

pools. According to NatureScot's guidance these should be completely avoided. These bog pools were most frequently found in the Near-Natural blanket bog and these areas have been completely avoided by the design. However, some M2 and M3 would likely be lost. The pools are generally small c. 2 m x 2 m in size. Target Notes have been made of where they are located (**Annex 1: Target Notes and Design Advice from June 2025 and Annex 2: Target Notes December 2025**) and some design changes have been made to avoid areas with higher concentrations of these bog pools. For example, the turbine location and laydown area of Turbine 2 was moved to reduce the impacts on pools. However, it is recognised that total avoidance was not possible with the Proposed Development Footprint.

If consent is granted, further mitigation is recommended during the construction through targeted micro-siting by an experienced peatland Ecological Clerk of Works (ECoW).

To comply with NatureScot guidance and NPF4 the mitigation hierarchy has been followed, and Near-Natural blanket bog has been avoided by the design. Targeted, site specific peatland restoration will be developed as part of an Outline Biodiversity and Habitat Management Plan (OBEHMP) for the Proposed Development.

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Annex A: Target Notes and Design Advice from June 2025

Neshion – Initial Comments on Design Chill – June 2025

Dr Kate Massey, Alba Ecology, July 2025

Introduction

Dr Kate Massey, of Alba Ecology walked the Neshion Energy Park design chill layout (issued April 2025) in June 2025, assessing peatland importance through targeted data collection and made comments on the peatland habitats present in regard to NatureScot's (NS) guidance on peatland habitats for proposed developments.

Background

NS guidance in relation to peatland habitat recommends that some priority peatland communities should be completely avoided by design layouts, this includes all bog pool communities (National Vegetation Classification (NVC) communities M1, M2 and M3) (NS, 2023). They also consider that blanket bog identified as NVC community M17, M18 and M19 may raise issues of national interest and so they may object to schemes potentially impacting upon these habitat types.

In the habitat survey report (**Technical Appendix 6.2: Habitat Survey report (EIAR Volume 4)**) undertaken by Dr Massey in July 2022 the Study Area was characterised as predominantly blanket bog and dry modified bog which are peatland habitats, with the most common NVC community mapped across the Study Area being M17b. The condition of the peatland habitat was reported as very variable, on a continuum from very wet, high quality blanket bog in Near-Natural condition to Modified and Drained bog. There were widespread degraded areas that were Actively Eroding.

Due to the high occurrence of peatland habitats at the Site It will be very important to demonstrate close adherence to the mitigation hierarchy with regard to priority peatland habitats. To first avoid and then minimise impact on bog habitats, this will include avoiding and minimising impacts on bog pools and the M17b community at large.

It should be noted that in June 2025, many of the bare peat areas had temporary, shallow surface water in them after recent heavy rain. This was in areas mapped as actively eroding, and in small, isolated hollows with bare peat in the wider blanket bog habitat. Whilst these areas and hollows may not hold water permanently, they clearly have some ability to hold water during and after wet conditions. These areas of bare peat, are not currently of high ecological value and are not likely to be actively forming peat, generally having little to no *Sphagnum* present. However, they do have the potential to become permanently wetted bog pools with *Sphagnum* species through peatland restoration with higher ecological value.

NS guidance (2023) recommends compensation to impacts on blanket bog in the order of 1:10 (lost: restored), with an additional recommended for enhancement. Therefore, the identification of peatland restoration is of high importance. For every 1 ha impacted by a proposed development a minimum of 10 ha should be restored. Therefore, actions taken to reduce the impact of the Proposed Development Footprint on blanket bog habitats will likely reduce the requirement in terms of required blanket bog restoration as well as reducing the

risk of objection from NS. Furthermore, areas with substantial potential for blanket bog restoration will likely be very important in helping to reach and deliver the compensation and enhancement requirement. Consequently, such restoration areas hold an added value to the Proposed Development.

It is important (under NPF4) to recognise that avoidance must be transparently demonstrated in the design description. Therefore, if and where a recommended action to the current design chill is considered not deemed not possible, this must be articulated clearly with evidence of why such an action cannot take place and so is 'unavoidable'.

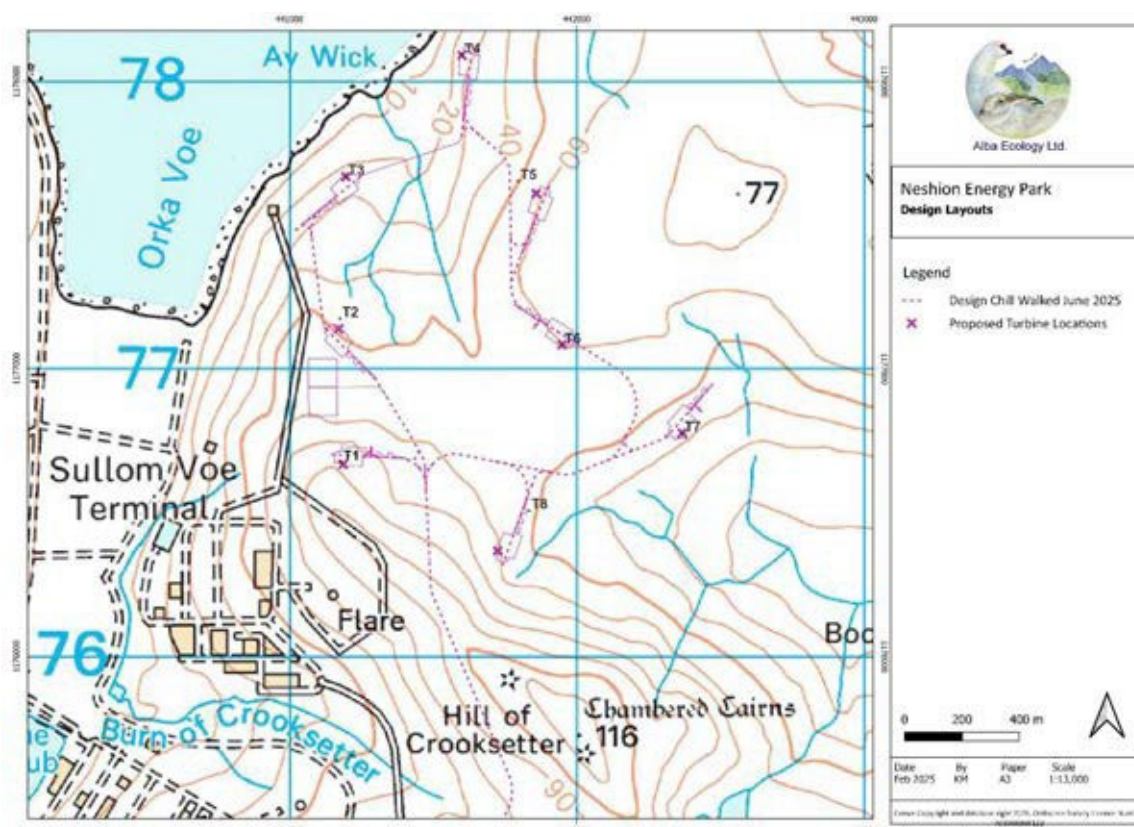
Methods

The design chill layout was walked in June 2025 making comments in relation to blanket bog habitats and NS guidance. Quadrat and transect data were taken at each turbine location and several other locations (such as borrow pits, track locations and in Near-Natural bog as a control comparison). Full details of these methods and results will be provided in the full report which will be a Technical Appendix to the EIAR submission (**Technical Appendix 6.3: Vegetation Assessment of Proposed Development Footprint (EIAR Volume 4)**).

This interim report summaries the findings from June 2025 and provides advice on where the design chill layout could be altered to demonstrate avoidance of peatland habitat in accordance with the mitigation hierarchy (as per NPF4).

The June 2025 design chill layout is shown in **Figure 1: Design Chill Layout with Turbine Numbering Used During Field Survey in June 2025**.

Figure 1: Design Chill Layout with Turbine Numbering Used During Field Survey in June 2025



Results

Table 2 provides comments on each of the proposed design elements, such as turbines, track and borrow pits and makes recommendations on possible actions where considered necessary. **Figure 2: Target Notes on the Design Chill Layout, June 2025** and **Table 2** provide the Target Notes for the walkover survey, including illustrative photos.

The key recommendations are:

- Reduce the length of the access track. The track runs for c. 2 km before reaching any turbines. There is adjacent existing infrastructure that could be used. This would substantively reduce impacts and demonstrate avoidance of priority peatland habitats. **It was advised by the Applicant this change was not possible. This is Addressed in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2).**
- Some changes to turbine locations to reduce impacts on peatland habitats and bog pools. For example, realigning the laydown area of Turbine 8 south or south southwest to run along the hill slope, rather than into the wetter bog. **This change was made to reduce impacts on wetter bog.**
- Realign some of the track within the turbine area. For example,
 - Between Turbine 1 and Turbine 8 there is a lot of wet ground near the Near-Natural blanket bog which should be avoided. **This change was made to reduce impacts on nearby Near-Natural bog.**
 - Avoid the actively eroding bog e.g. around Turbine 6 and Turbine 8. These areas could be restored to active blanket bog.

- **This change was made to reduce impacts on bog with a high potential for restoration.**

Table 1: Comments on Elements of the Design Chill Made in June 2025 in Relation to Peatland Habitats with Recommendations for Action Where Considered Necessary.

Design Element	Comments	Actions
Turbine 7 (T7)	The general area was variable in terms of habitat types as mapped (mixture of bog, dry heath and acid grassland). With frequent rises and some possible old peat cuttings or work. The actual T7 grid reference provided was on dry heath. The quadrat was located in representative bog habitat c. 18m away from T7. The bog habitat was clearly on deep peat. It was made up of common cottongrass over heather with crowberry and tormentil. Mosses were feathermosses with only very limited bog-moss. The transect North had a single pool and ended in an erosion feature. There were no bog moss hummocks in the area. The transect bog pool was c. 1 m x 3 m² with <i>Sphagnum cuspidatum</i> and common cottongrass. No relocation action required, nearby bog pool sensitivities should be addressed through careful micro-siting.	There were few bog pools which, when present, should be avoided wherever possible.
Track to Turbine 6 (T6)	There were some bog-pools present which should be avoided by the planned route. The areas shown as actively eroding in the PCA and so should be avoided. These areas can be restored to have active bog pools.	Re-align track. This change was made to reduce impacts on bog with a high potential for restoration
T6	On bog with deep peat. M17b as mapped. Generally, a low amount of bog moss. Some <i>S. capillifolium</i> hummocks, including damaged ones. <i>R. lanuginosum</i> dominated with lichens. Not likely to be normally active. However, the surface includes some hollows. Many of these are largely bare peat at the base, but some have <i>S. cuspidatum</i> or <i>S. fallax</i>. This area is not ideal as there are elements of Near-Natural bog (although it's not in a Near-Natural condition) A pair of dunlin were breeding near this location in 2025. The laydown area included pools and was busy with breeding bird activity.	Potentially relocate to e.g. shallow soils. This change was made to reduce impacts on bog

Design Element	Comments	Actions
Compound area by site entrance	Tussocky vegetation dominated by common cottongrass over heather. Bog-mosses were restricted in cover due to thick thatch of common cottongrass. Fairly wet area with some <i>S. capillifolium</i> hummocks with round-leaved sundew. The area has a number of poor M3 pools and erosion features. Modified through grazing. Trails notable.	No relocation action required, although avoid bog pools wherever possible.
Track from entrance to turbine area	Mixture of habitats along lengthy track section. Some bog pools present particularly at the first section. Generally common cottongrass with heather and lichens. 'Grassy' look due to grazing. Dry underfoot.	Large amount of land-take and disturbance of peatland habitat from very long track, c. 2 km long. Recommend removing this track and potentially entering site from Sullom Voe, using the existing private road that is parallel. It was advised by the Applicant this change was not possible. This is Addressed in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2).
Track confluences near Turbine 1 (T1)	Frequent pools at edge of Near-Natural bog.	Recommend realigning track. This change was made to reduce impacts on nearby Near-Natural bog.
T1	No pools or surface water present. Erosion features present. Some evidence of sheep grazing and graminoids common in bog habitat. Little to no bog moss.	No relocation action required.
Track to Turbine 2 (T2)	Several bog pools were recorded on route. Avoid areas mapped as 10% pools.	Microsite around bog pools wherever possible.
T2	Generally dry blanket bog as mapped. With pools of large bare peat with water in it (from recent heavy rain). Occasional <i>S. capillifolium</i> hummocks, but mostly little bog moss present.	Generally suitable, but bog pools should be avoided wherever possible.
Compound near T2	Generally dry blanket bog. However, some of the compound area has frequent pools. They were generally bare peat with water	Recommend changing design/reducing footprint to avoid pools.

Design Element	Comments	Actions
	on top, but they should be avoided wherever possible.	This change was made to reduce impacts on pools.
Track to Turbine 3 (T3)	Generally, fairly dry habitat although three pools noted. Land-take could be reduced by using the existing infrastructure which was less than 50 m away.	Recommend using the existing infrastructure. Avoid bog pools wherever possible. It was advised by the Applicant this change was not possible. This is Addressed in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2).
T3	Actual turbine location was in small rise of dry heath. Moved quadrat to nearby representative bog habitat which was dominated by common cottongrass. Bog-mosses were patchy. Some <i>S capillifolium</i> hummocks were present in area. Three bog pools immediately adjacent and additional pools were in the wider area. Generally OK with location habitat wise, but very close to the sea and Special Area of Conservation (SAC) boundary.	Consider moving away from the SAC boundary.
Track to Turbine 4 (T4)	Several flushes and watercourse.	Hydrologist to comment.
T4	T4 actual location was in dry heath. Nearby blanket bog was assessed. It was generally dry underfoot. A bog pool was nearby, but there was relatively little surface water in the area compared to other locations. Some bog-moss, round-leaved sundew, bog asphodel and butterwort in quadrat. No action required.	No relocation action required (other than avoiding nearby bog pools wherever possible).
Track to Turbine 5 (T5) and T6	Frequent bog pools and erosion features up the slope to towards T6. Some were bog-moss filled, other where bare peat with water on top. The area mapped as actively eroding should be avoided and restored.	Avoid the bog that is mapped as actively eroding. Avoid bog pools wherever possible. This change was made to reduce impacts on bog with a high potential for restoration.
T5	Dry underfoot. Grassy form of M17b as mapped. No pools at the T5 location, but	Turbine location potentially suitable but track and laydown

Design Element	Comments	Actions
	present on track to T5. Unlikely to be actively forming peat.	area should be carefully located (as above). T5 location and laydown area repositioned to avoid pools.
Borrow pit (north)	M17b as mapped. No surface water.	No relocation action required. This borrow pit was removed from the design.
Turbine 8 (T8)	Uniform M17b. No surface water at turbine location. Some <i>S. capillifolium</i> , with round-leaved sundew. Bog pools frequent at laydown area near and at Near-Natural bog. This should be avoided.	Recommend changing the direction of the laydown and entrance to T8, to avoid the nearby Near-Natural bog. T8 location and laydown area repositioned to avoid Near-Natural blanket bog.
Track confluence near T8	Very wet bog with pools between two area of Near-Natural blanket bog.	Recommend relocating track. This change was made to avoid impacts on wet blanket bog.
Track between T8 and T1	Crossing section that is actively eroding. This area should be avoided and restored.	Recommend relocating track. This change was made to reduce impacts on bog with a high potential for restoration.
Borrow pit (south)		No relocation action required.

Figure 2: Target Notes on the Design Chill Layout, June 2025

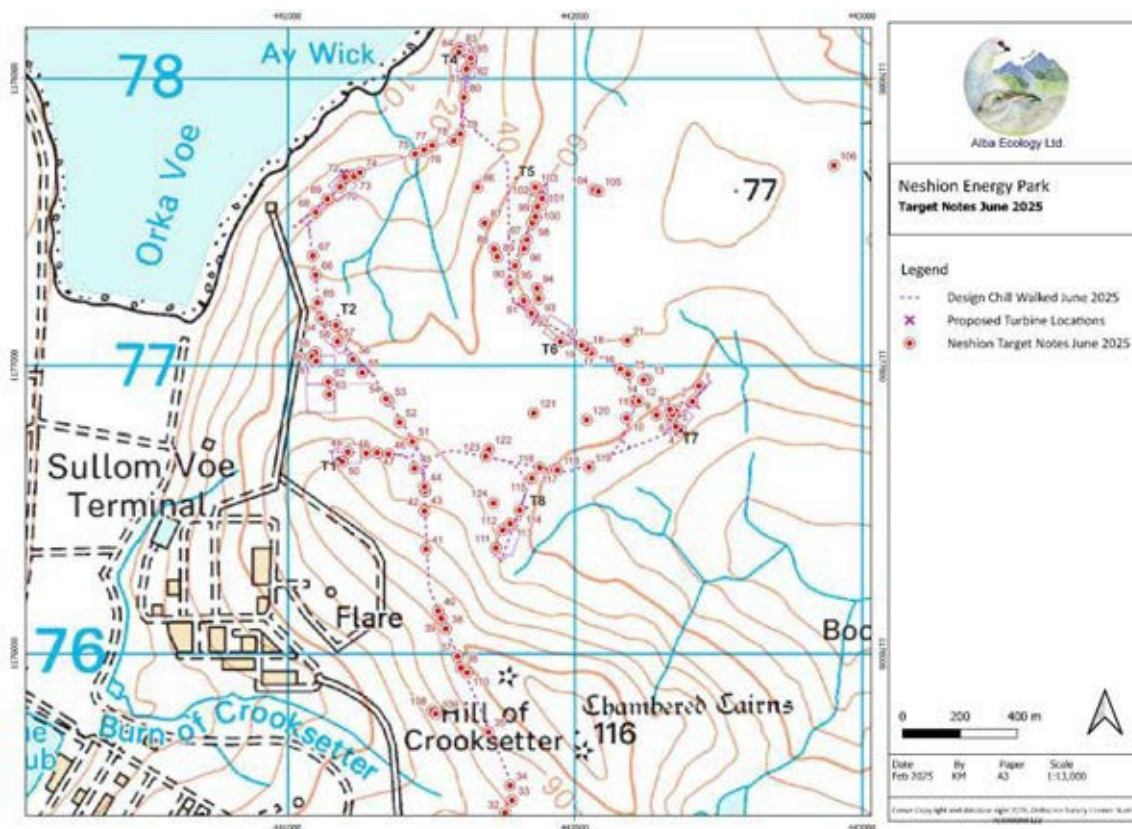
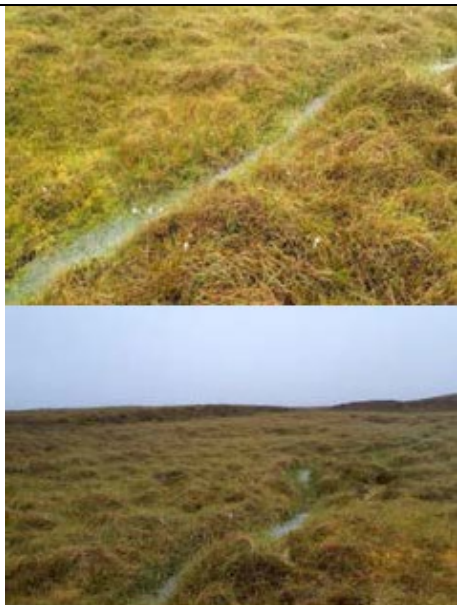
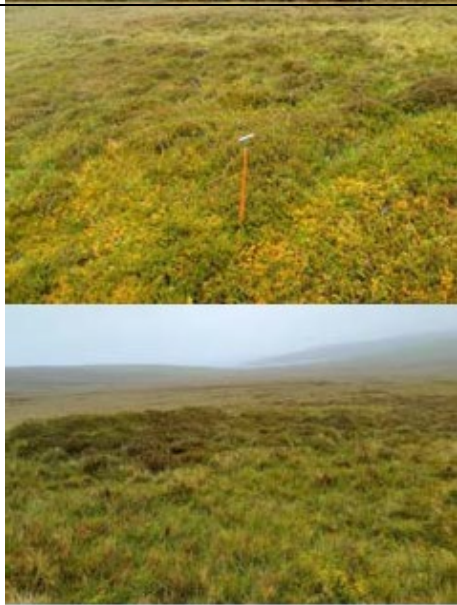
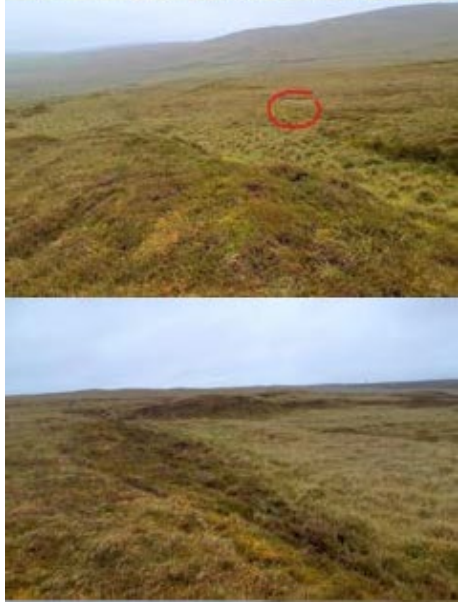


Table 2: Target Notes on the Design Chill Layout, June 2025.

No	Grid	Note	Photo
1	HU 42432 76929	T7 – Laydown Area. Dry heath at lay down area. Shallow soils. No action needed.	
2	HU 42410 76874	T7 – Laydown Area. Common cotton grass rich area of heath but appears shallow soils. No action needed.	

No	Grid	Note	Photo
3	HU 42352 76841	T7 – Laydown Area. Water movement line from an area of deeper peat set within mounds. Possibly an old drain line. There also appeared to be mounding from old peat cuttings. No action needed.	
4	HU 42367 76774	T7 – Turbine Location. The exact co-ordinates for the T7 location was on a rise of dry heath. However, there was bog nearby. Quadrat taken in nearby bog that would likely be impacted by the turbine if it went here.	
5	HU 42352 76787	Quadrat for T7 taken at this location. The bog habitat was clearly on deep peat. It was made up of common cottongrass over heather with crowberry and tormentil. Mosses were feathermosses with only very limited bog moss. Transect North had a single pool and ended in an erosion feature. There were no bog moss hummocks in the area. Bog pool was c. 1m x 3m ² with <i>S. cuspidatum</i> and common cottongrass. No action needed.	

No	Grid	Note	Photo
6	HU 42334 76814	T7 – Laydown Area. Bog pool in north transect for T7. Avoid bog pools wherever possible.	
7	HU 42340 76829	T7 – Laydown Area. Evidence of sheep sheltering making an erosion feature. No action required.	
8	HU 42331 76846	T7 – Laydown Area. View of area. Likely old, peat cuttings. One pool present, not forming a bog pool complex. Avoid pools wherever possible.	
9	HU 42285 76827	Outwith design. Three larger bog pools. Ensure avoidance.	
10	HU 42180 76817	Track to T6. Bog pool present. Avoid through micro-siting.	

No	Grid	Note	Photo
11	HU 42206 76873	Track to T6. After heavy rain, water was collecting at the base of generally dry peat/bare pools. There were no bog-mosses in these patches. These areas should be avoided by the design and restored to allow them to retain water in drier periods.	
12	HU 42223 76876	Track to T6. Recommend changing the track design to avoid this area. Recommend realigning track.	
13	HU 42252 76951	Recommend bring track out to this area. Recommend realigning track.	
14	HU 42239 76949	Outwith design. This area requires peatland restoration. Restoration opportunity.	
15	HU 42186 76970	Track to T6. Does not appear ideal for track. 2 m deep, erosion gullies etc which could be restored. Recommend realigning track.	

No	Grid	Note	Photo
16	HU 42159 76988	Track to T6. This section is flatter. No large erosion features although micro-erosion was evident. No action needed.	
17	HU 42057 77044	Track to T6. Erosion feature which could be restored. Recommend realigning track.	
18	HU 42041 77057	Track to T6. Erosion features that could be restored. Recommend realigning track.	
19	HU 42024 77070	Track to T6. Water-filled base of some erosion features, some pools present. Recommend realigning track.	
20	HU 41950 77083	T6. On bog with deep peat. M17b as mapped. Generally, a low amount of bog moss. Some <i>S. capillifolium</i> hummocks, including damaged ones. Woolly fringe moss dominated with lichens. Not likely to be normally active. However, vegetation surface includes some hollows. Many of these are largely bare peat at the base, but some have <i>S. cuspidatum</i> or <i>S. fallax</i> . Consider relocating.	

No	Grid	Note	Photo
21	HU 42183 77087	Outwith design. Suitable for gully blocking and peatland restoration.	
22	HU 41415 75168	Entrance to site. Long way from turbines. Consider repositioning entrance in partnership with Sullom Voe?	
23	HU 41428 75191	Track to compound area. M3 pool. Bare peat with a little common cottongrass. Patches of bog moss, but more patches of bare peat. Avoid bog pools wherever possible.	
24	HU 41495 75250	Track to compound area. Pools associated with erosion features and hollows. Erosion features c. 0.5 m deep. Avoid bog pools wherever possible.	
25	HU 41555 75313	Compound area. Erosion features and pools were common in this area. Some pool would be lost. Pools were usually of bare peat with little to no bog moss. Avoid bog pools wherever possible.	

No	Grid	Note	Photo
26	HU 41523 75341	Compound area. Quadrat taken (C1). No action required.	
27	HU 41621 75285	Compound area. Erosion features. No action required.	
28	HU 41606 75255	Compound area. Quadrat taken (C2). No action required.	
29	HU 41632 75352	Track to turbines. Collection of pools at base of erosion area. <i>S cuspidatum</i> in pools. Avoid bog pools wherever possible. Track is very long. Reduce length if possible.	
30	HU 41671 75377	Track to turbines. Bog pools were very common. Avoid bog pools wherever possible.	
31	HU 41732 75425	Track to turbines. Erosion features and bare peat. Restore wherever possible.	

No	Grid	Note	Photo
			
32	HU 41757 75445	Track to turbines. More bog pools. Bare in centre, but patches of bog-mosses present. Avoid bog pools wherever possible.	
33	HU 41782 75488	Track to turbines. Erosion feature, could be blocked.	
34	HU 41775 75540	Track to turbines. Bog pool c. 2 m x 2 m in size. At base of small erosion feature which was well vegetated. Avoid bog pools wherever possible.	
35	HU 41699 75726	Track to turbines. This section had dense vegetation with old drains and sheep trails. No surface water. No action needed.	
36	HU 41603 75950	Track to turbines. No bog pools in this area. View of nearby infrastructure at Sullom Voe. Potential to use nearby infrastructure.	

No	Grid	Note	Photo
37	HU 41592 75990	Track to turbines. Quadrat taken (R3). No action required.	
38	HU 41551 76086	Track to turbines. At edge of erosion features. Water at base. Could use track as a barrier here to prevent water loss. Restore or infill surrounding bog. Second photo shows example water escape route. Recommend using the track to block these.	
39	HU 41536 76121	Track to turbines. Pools at base of erosion area. Avoid bog pools wherever possible.	
40	HU 41524 76148	Track to turbines. View looking back. Avoid bog pools wherever possible.	

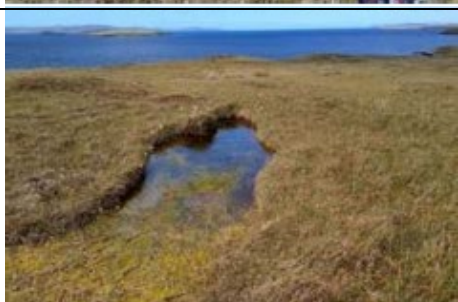
No	Grid	Note	Photo
41	HU 41482 76363	Track to turbines. Erosion features common on the slope. Restore where possible.	
42	HU 41477 76496	Track to turbines. This section was generally graminoid dominated with little surface water. No action needed.	
43	HU 41479 76565	Track to turbines. Flush. May be old drain. Hydrologist to comment and advise.	
44	HU 41477 76581	Track to turbines. Wet area with several pools where flushes drain into. Between sections of Near-Natural bog. About 10 m x 10 m in size. This area should be avoided. Recommend realigning track.	
45	HU 41442 76645	Track to turbines. Breeding dunlin present (indicative of better-quality blanket bog). Near Near-Natural blanket bog. Avoid Near-Natural blanket bog and pool.	
46	HU 41351 76694	T1 – Laydown Area. This section has no pools or hollows. No action required.	

No	Grid	Note	Photo
47	HU 41312 76700	T1 – Laydown Area. Water movement at side of erosion features. No action required.	
48	HU 41274 76697	T1 – Laydown Area. Erosion features c. 1 m deep. Restore where possible.	
49	HU 41210 76702	T1 – Laydown Area. Hill slope with occasional folds and erosion features. No action required.	
50	HU 41190 76668	T1. No pools or surface water present. Erosion features present. No action required.	
51	HU 41435 76738	Track to T2. Large pool. Bare peat with water. Not considered high quality pool but could be restored (to retain water for longer).	
52	HU 41390 76802	Track to T2. Bare peat with water and plastic rubbish in it. Not considered high quality pool but could be restored (to retain water for longer/permanently).	

No	Grid	Note	Photo
53	HU 41353 76876	Track to T2. Drain line. Block drains.	
54	HU 41343 76884	Track to T2. Bog pools with bog-mosses present. Avoid bog pools wherever possible.	
55	HU 41260 76975	Track to T2. Large pool here. 3 m x 10 m. Avoid bog pools wherever possible.	
56	HU 41228 77021	Track to T2. Series of pools. Little bog-moss present. Generally bare peat with water on top. <i>S. fallax</i> at edges at some places. Not considered high quality pool but could be restored (to retain water for longer/permanently).	
57	HU 41174 77083	Track to T2. Water movement and flush habitat. Hydrologist to comment and advise.	

No	Grid	Note	Photo
58	HU 41169 77140	T2. Dry underfoot. M17b blanket bog with occasional pools of largely bare peat with water.	
59	HU 41097 77045	Compound near T2. Pools and erosion features. Avoid bog pools wherever possible.	
60	HU 41085 77031	Compound near T2. Erosion features with bog pools at base. Substantial restoration opportunity.	
61	HU 41100 77015	Compound near T2. Pools. In drier conditions these 'pools' would simply be bare peat. Not bog-moss rich or wet underfoot. However, the area could be restored. Avoid area with pools (mapped as 10% M2).	
62	HU 41142 76943	Compound near T2. Pool present. Avoid bog pools wherever possible.	
63	HU 41145 76899	Compound near T2. Quadrat taken (C3).	

No	Grid	Note	Photo
64	HU 41118 77164	Track to T3. Muddy pool. Algae growth. No action required.	
65	HU 41104 77219	Track to T3. Existing parallel road within Sullom Voe very close. Photo shows surveyor standing on existing track which was c. 50 m away. Recommended using existing road to reach this area, to reduce impact on bog habitat.	
66	HU 41098 77315	Track to T3. Wet area with pools and flushes leading to watercourse. Avoid pool wherever possible.	
67	HU 41088 77382	Track to T3. Goes over flushes and watercourse (hydrologist input required). Series of pools too. Breeding dunlin present. Avoid pools wherever possible.	 
68	HU 41098 77534	T3 – Laydown Area. Dry M17b blanket bog as mapped. Little surface water here. No action required.	

No	Grid	Note	Photo
69	HU 41139 77580	T3 – Laydown Area. Occasional small erosion features, c. 0.5 m. No action required.	
70	HU 41184 77622	T3 – Laydown Area. Fairly dry blanket bog as mapped. Patches of bog mosses. Occasional small erosion features. Little to no surface water. No action required.	
71	HU 41205 77657	T3 – Laydown Area. Three small bog pools here. Avoid pools wherever possible.	
72	HU 41199 77656	T3. Actual location on small rise of dry heath less than 5 m in size, so moved quadrat on to representative bog habitat. No action required.	
73	HU 41231 77658	Track to T4. Bog pools. Avoid pools wherever possible.	
74	HU 41252 77672	Track to T4. Bog pools. Avoid pools wherever possible.	

No	Grid	Note	Photo
75	HU 41444 77737	Track to T4. Watercourse crossing point with steep banks and sheep grazing.	
76	HU 41475 77751	Track to T4. Erosion features. Restoration opportunity.	
77	HU 41504 77767	Track to T4. Going up flush through dry heath. No action required.	
78	HU 41578 77783	Track to T4. M6c flush. Potential GWDTE. Hydrologist to comment on and advise whether it is an actual GWDTE.	
79	HU 41602 77807	Track to T4. Water movement and M6 flush. Hydrologist to comment on and advise whether it is an actual GWDTE.	
80	HU 41614 77934	Track to T4. Little surface water at this location. M17b blanket bog as mapped. No action required.	

No	Grid	Note	Photo
81	HU 41622 78032	Track to T4. This area has little surface water. No action required.	
82	HU 41640 78056	Track to T4. Single bog pool (1 m x 2 m) in size. Avoid bog pools wherever possible.	
83	HU 41599 78107	T4 location. On dry heath as mapped. Quadrat survey in nearby bog habitat potentially impacted by laydown area. No action required.	
84	HU 41596 78091	T4 quadrat taken at this location. Dry underfoot. Bog pool nearby, but relatively little surface water in the area. Some bog-moss, round-leaved sundew, bog asphodel and butterwort in quadrat. No action required.	
85	HU 41638 78071	T4 location. View.	
86	HU 41661 77621	Track to T5/T6. Little surface water. No action required.	

No	Grid	Note	Photo
87	HU 41686 77496	Track to T5/T6. Bog pools present (c. 1 m x 2 m) with bog-mosses. Avoid bog pools wherever possible.	
88	HU 41719 77407	Track to T5/T6. Dry heath at watercourse as mapped. Flush, M6c and M6a also present.	
89	HU 41730 77379	Track to T5/T6. Bog pool. Avoid bog pools wherever possible.	
90	HU 41776 77286	Track to T6. Bog pools common. Avoid bog pools wherever possible.	
91	HU 41822 77226	Track to T6. High degree of erosion. Lots of breeding bird activity. Gulls, golden plover, dunlin. Restoration opportunity.	
92	HU 41849 77181	T6 – Laydown Area. Edge of erosion area. Lots of pools and bare peat. Avoid and restore.	

No	Grid	Note	Photo
93	HU 41874 77233	Outwith design. Example of an erosion gullies with restoration potential. Suitable for blocking and restoration.	
94	HU 41868 77269	Outwith design. Example of erosion area. Suitable for peatland restoration.	
95	HU 41792 77347	Track to T5. Frequent bog pools. Avoid bog pools wherever possible.	
96	HU 41823 77407	T5 – Laydown Area. Erosion features were water filled. Avoid and restore wherever possible.	
97	HU 41833 77438	T5 – Laydown Area. Erosion in dry modified bog as mapped. Avoid and restore wherever possible.	

No	Grid	Note	Photo
98	HU 41852 77496	T5 – Laydown Area. Frequent bog pools. Avoid bog pools wherever possible.	
99	HU 41863 77518	T5 – Laydown Area. Pools and erosion features. Avoid bog pools wherever possible.	
100	HU 41870 77553	T5 – Laydown Area. Flush. Hydrologist to comment and advise.	
101	HU 41886 77582	T5 – Laydown Area. The pools were largely bare peat with water in them. Avoid bog pools wherever possible.	
102	HU 41860 77610	T5. Located at patch of dry heath as mapped. Quadrat was taken in nearby representative bog.	
103	HU 41862 77621	T5 location. Dry underfoot. Grassy form of M17b as mapped. No pools at the T5 location. No action required.	

No	Grid	Note	Photo
104	HU 42066 77612	Outwith design. Erosion gullies should be blocked to raise the water table. Restoration opportunity.	
105	HU 42083 77607	Outwith design. Bare peat and erosion features suitable for peatland restoration.	
106	HU 42902 77697	Outwith design and survey area. Widespread erosion common in this area. Outside side line boundary. This area could be restored and would add to the peatland restoration opportunities on site.	
107	HU 43404 74746	Outwith design. Potential for riparian planting along this burn. Biodiversity enhancement.	
108	HU 41504 75801	Borrow pit location. On hill slope. No surface water. Near current works. No action required.	
109	HU 41516 75790	Borrow pit location. Quadrat (BP1). Hill slope with deep peat. No surface water. Hummocks of <i>S. capillifolium</i> common. Patchy. Graminoid dominated. Sheep trails common. Current works nearby. No action required.	

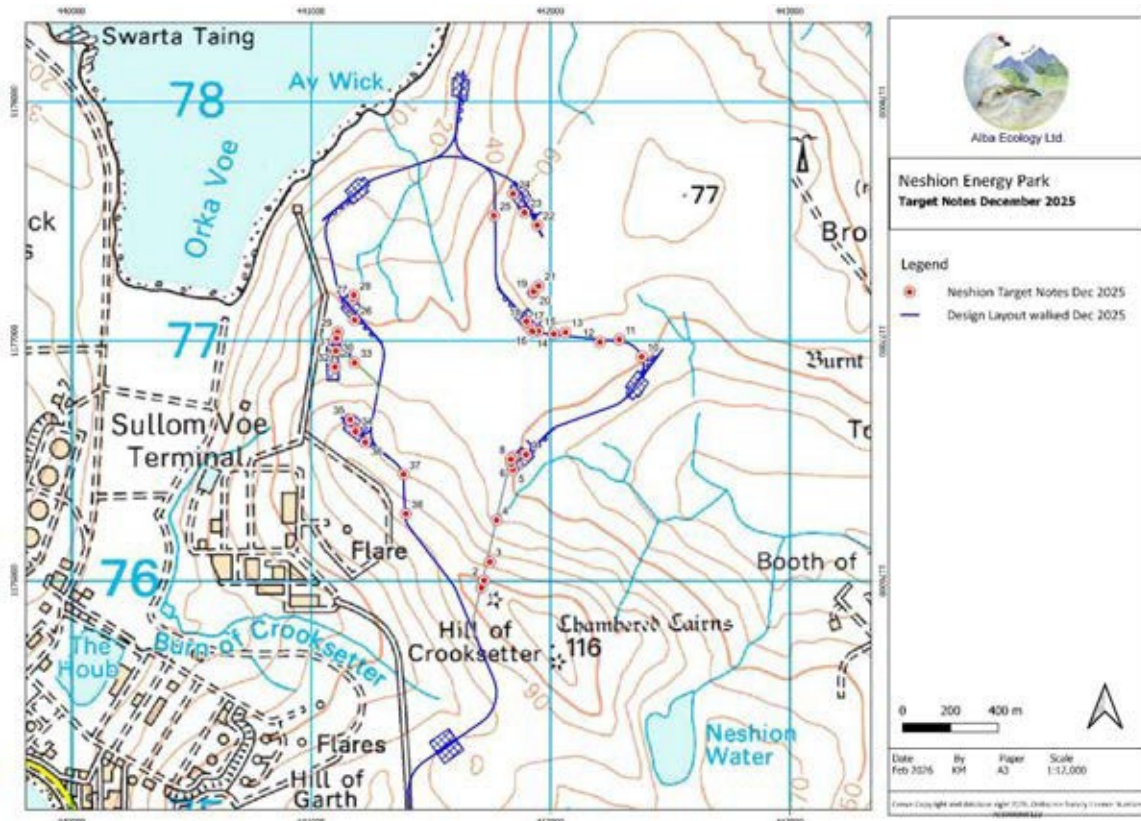
No	Grid	Note	Photo
110	HU 41625 75933	Track to T1. View of existing road and infrastructure. Recommend investigate using existing infrastructure.	
111	HU 41725 76367	T8. M17 as mapped. No surface water at turbine location. Some <i>S. capillifolium</i> , with round-leaved sundew.	
112	HU 41749 76430	T8 - Laydown Area. Bog pool at edge of Near-Natural bog. Avoid bog pools and Near-Natural bog.	
113	HU 41775 76452	T8 - Laydown Area. More pools. Avoid bog pools and Near-Natural bog.	
114	HU 41808 76499	T8 - Laydown Area. Pools and erosion features. Avoid bog pools wherever possible.	
115	HU 41851 76611	Track confluence (near T8). Frequent pools between Near-Natural bog. Avoid bog pools wherever possible.	

No	Grid	Note	Photo
116	HU 41878 76647	Track confluence (near T8). Very frequent bog pools. Avoid bog pools wherever possible.	
117	HU 41926 76639	Track confluence (near T8). Very frequent bog pools. Avoid bog pools wherever possible.	
118	HU 41939 76639	Track to T7. Drainage ditch. Suitable for restoration.	
119	HU 42050 76649	Track to T7. Water crossing. Hydrology to comment.	
120	HU 42041 76810	Outwith design. Example of Near-Natural bog. These locations are very wet and bog-moss filled. Very likely to be actively forming peat. Avoid.	
121	HU 41857 76834	Outwith design. Area mapped as actively eroding. Lots of water present in this area on the bare peat. Restore to maintain the water throughout the year.	

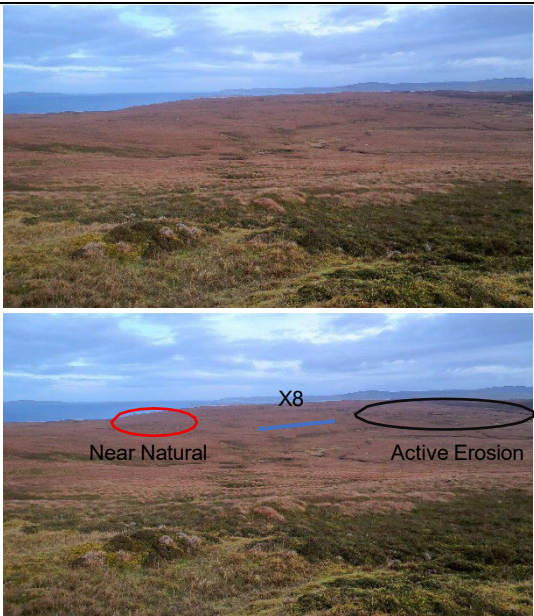
No	Grid	Note	Photo
122	HU 41701 76711	Outwith design. Example of actively eroding area. Water table has dropped allowing bare peat rather than bog-moss filled pools. Requires very sensitive peatland restoration. Peat should not in fill these areas. Water escape routes should be carefully blocked to allow the area to retain more water for longer/permanently.	
123	HU 41690 76687	Track between T1 and T8. On area of actively eroding bog. Wet. Avoid and restore.	
124	HU 41717 76524	Example of Near-Natural bog. Hummock-hollow structure evident. Very wet and bog-moss rich.	
125	HU 41411 74891	Track to southern borrow pit. Existing track here. Use existing infrastructure wherever possible.	

No	Grid	Note	Photo
126	HU 41600 74557	Borrow pit (south). View of borrow pit area. Small erosion features and damp patches at the base. No action required.	
127	HU 41659 74512	Borrow pit (south). Dry heath and dry modified bog as mapped. Largely shallow soils. No action required.	

Annex B: Target Notes December 2025



No.	Grid	Note	Photo
1	HU 41712 75970	Repositioned track to T8. New track takes steep slope of M19 toward repositioned T8. M19 has thatch of hare's-tail cottongrass, common cottongrass, heather and crowberry with <i>H. splendums</i> . <i>S. capillifolium</i> present in patches.	

2	HU 41723 76000	Repositioned track to T8. In this photo the shiny dots to the west (left) are the pools in the Near-Natural bog, and the erosion is clear in the east (right). T8 is positioned on the dark line above the watercourse.	
3	HU 41747 76078	Repositioned track to T8. Example of a deep drainage ditch in M19.	
4	HU 41775 76253	Repositioned track to T8. New track going over head of watercourse where there is exposed peat.	
5	HU 41843 76465	Repositioned T8 laydown area. Note old drain with flush habitat linking to watercourse.	

6	HU 41837 76488	Repositioned T8 laydown area. Water movement. Some M6 characteristics but water flowing across vegetation.	
7	HU 41846 76517	Repositioned T8 laydown area. Water over bare peat. This is not an important bog pool, but merely water pooling on bare peat.	
8	HU 41835 76508	Repositioned T8 quadrat.	
9	HU 41898 76527	Repositioned T8 laydown area. Dry area of vegetation around drainage ditches.	

10	HU 42381 76933	Repositioned track T7-T6. Track around large bare peat patches with water pooling here. This would likely be just bare peat in dry periods e.g. summer. Potential for micro-siting.	 
11	HU 42288 77005	Repositioned track T7-T6. There were some M2 pools along this route. Recommend micro-siting where possible. The route avoids the larger area with has Near-Natural potential.	
12	HU 42207 76995	Repositioned track T7-T6. Avoids area with high restoration potential. Some erosion features cross through the route.	
13	HU 42063 77035	Repositioned track T7-T6. Example erosion feature with water pouring through it.	

14	HU 42014 77028	Repositioned track T7-T6. This route avoids area of Near-Natural bog which is clearly visible. Recommend ensuring the hydrology is not disrupted.	
15	HU 41950 77041	Repositioned T6 laydown area. Water in bare peat. Demonstrates need for restoration. Avoids area of highest restoration potential.	 
16	HU 41926 77039	Repositioned T6 laydown area. Area of micro erosion. Bare peat.	
17	HU 41902 77065	Repositioned T6 laydown area. There are some M2 pools that would be lost area are in Modified condition.	

18	HU 41900 77081	Repositioned T6 laydown area. Pools of water on bare peat. Likely to be simply bare peat in dry spells e.g. summer.	
19	HU 41927 77200	Restoration opportunity. Area of Actively Eroding bog. View of heavily eroded area. There was water at the base of the erosion features, but it was c. 1 m below where the surface should be. Leaving lots of dried bare peatland. In the summer this area would be bare exposed peat. Note, survey was conducted in December after rain.	
20	HU 41930 77206	Restoration opportunity. Area of Actively Eroding bog. Another view of a heavily eroded area. In the summer this area would be bare and eroding.	
21	HU 41951 77229	Restoration opportunity .Area of Actively Eroding bog. Another view of a heavily eroded area. In the summer this area would be bare and eroding.	
22	HU 41945 77484	Repositioned T5 laydown area. Avoids area with high restoration potential. Avoid pools wherever possible. Erosion features also present.	

23	HU 41892 77537	Near repositioned T5 laydown area. Area of pools now avoided.	
24	HU 41844 77615	Repositioned T5. No quadrat taken as so close it would confound results. Modified blanket bog.	
25	HU 41764 77524	Repositioned track to T6. Modified bog in this location.	
26	HU 41182 77087	A historic drain filled with water and <i>Sphagnum</i> mosses.	
27	HU 41176 77175	Repositioned T2. There are pools around T2, M2 pools and bare peat with water. Avoid where possible.	

28	HU 41179 77191	T2 quadrat. Representative vegetation.	
29	HU 41112 77036	Compound now avoids area of more widespread pooling.	
30	HU 41107 77010	Pools are now avoided.	
31	HU 41104 76958	Repositioned compound location. M17b vegetation with few pools.	
32	HU 41100 76890	Repositioned compound location. Avoid pools wherever possible.	

33	HU 41182 76908	Track to compound. Track should be micro-sited to avoid pooling wherever possible.	
34	HU 41186 76624	Repositioned T1 laydown area. Much of T1 laydown area is now on dry heath. Some of which maybe present due to peat cuttings.	 
35	HU 41164 76670	Repositioned T1 laydown area. T1 position is c. 10 m away from previous location, so not repeating quadrat data collection. Suitable location.	

36	HU 41227 76579	Repositioned track from T1 to site entrance. Track avoids going through Near-Natural bog and importantly no longer goes between two sections of Near-Natural blanket bog. The slope it is now positioned on appears to be suitable.	
37	HU 41387 76445	Repositioned track from T1 to site entrance. Generally suitable habitat. Limited pools. Little to no <i>Sphagnum</i> moss present.	
38	HU 41396 76280	Repositioned track from T1 to site entrance. Track largely round the edge of Actively Eroding area. Avoid though micro-siting where possible and restore.	