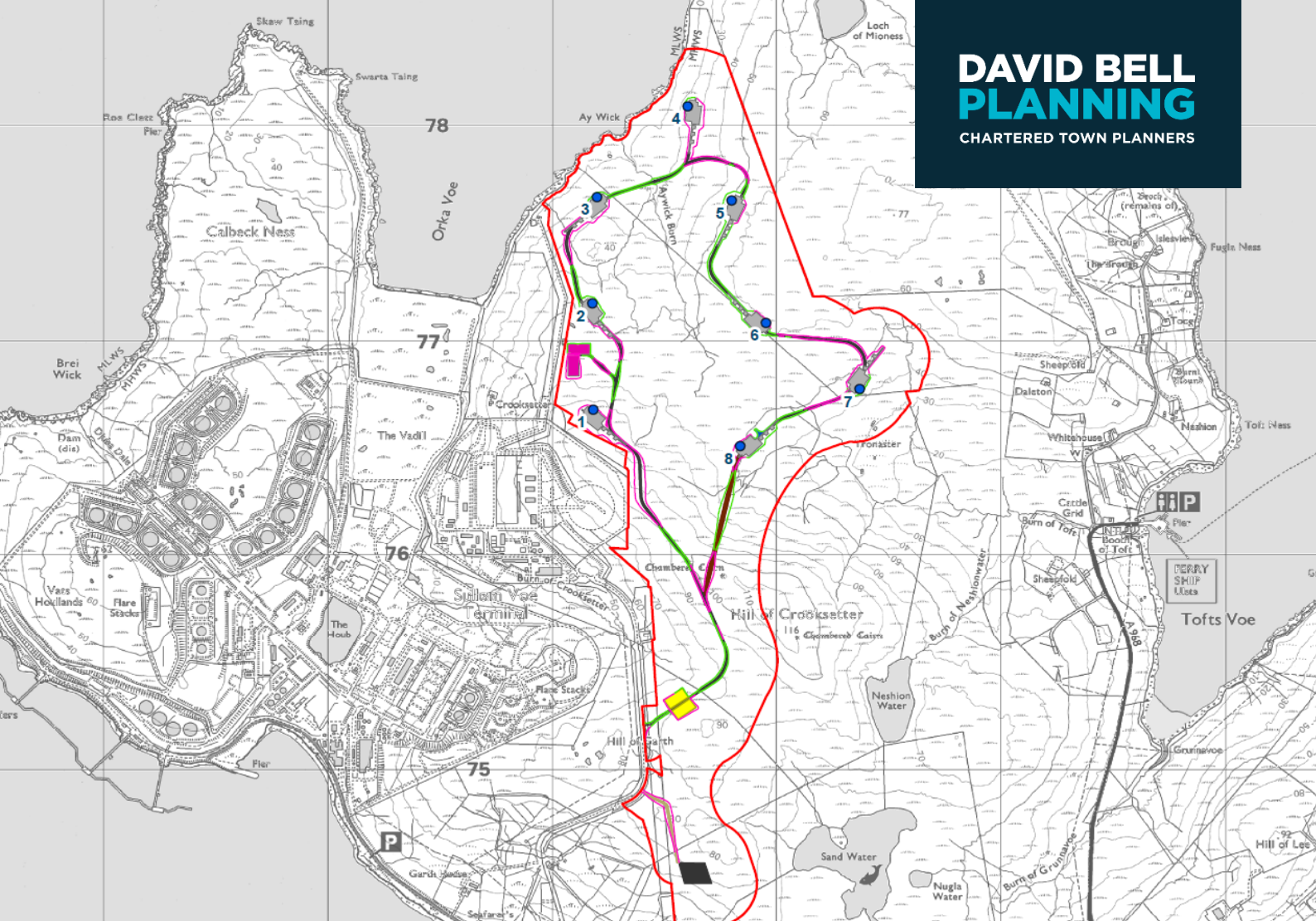




Neshion Energy Park, Sullom Voe

Section 36 Application:

Planning Statement

June 2026



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1. Introduction

1.1 Background

- 1.1.1 This Planning Statement has been prepared by David Bell Planning Ltd ('DBP') on behalf of Neshion Ltd (hereafter referred to as 'the Applicant') in relation to the Neshion Energy Park ('the Proposed Development').
- 1.1.2 The Proposed Development is a renewable energy 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 Site is located within Shetland Islands Council (SIC) administrative area. The Proposed Development is described in **Chapter 2: The Proposed Development (EIAR Volume 2)**.
- 1.1.3 The Proposed Development has a generation capacity greater than 50 megawatts ('MW').
- The Planning Statement supports a Section 36 application submitted under the Electricity Act 1989 ('the 1989 Act'), for consent to construct and operate the Proposed Development. In addition, the Applicant is also seeking consent for deemed planning permission under Section 57 of the Town and Country Planning (Scotland) Act 1997 ('the 1997 Act').
- 1.1.4 The application is accompanied by an Environmental Impact Assessment Report ('EIA Report') which has been undertaken in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'). The Environmental Impact Assessment Report ('the EIA Report') presents information on the identification and assessment of the likely significant positive and negative environmental effects of the Proposed Development.
- 1.1.5 This Planning Statement presents an assessment of the Proposed Development against relevant policy with due regard given to the provisions of the statutory Development Plan now made up of both National Planning Framework 4 ('NPF4') and the Local Development Plan for the SIC area, national energy and planning policy, and other relevant considerations.
- 1.1.6 This Planning Statement is supplementary to, and should be read in conjunction with, the EIA Report submitted with the Section 36 application. The Planning Statement considers the potential benefits and adverse effects which may arise and concludes as to the overall acceptability of the Proposed Development in relation to the planning policy framework and relevant considerations.

1.2 The Applicant

- 1.2.1 The Applicant, Neshion Ltd, is a joint venture set up between local families to develop a renewable energy project known as Neshion Energy Park. The delivery of the Proposed Development is being led by the Shetland Aerogenerators Development Team. Shetland Aerogenerators is an experienced local renewable energy developer and is the owner and operator of the Burradale and Luggie's Knowe Wind Farms.

1.3 The Statutory Framework

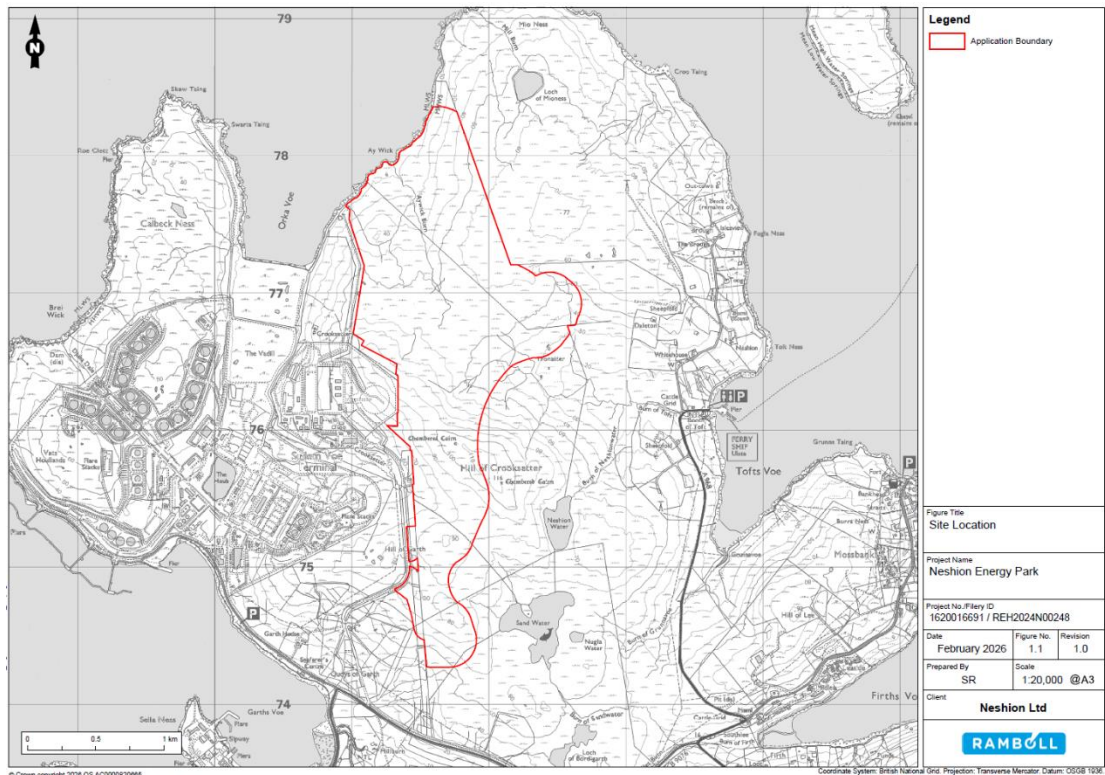
- 1.3.1 An application under Section 36 of the 1989 Act for consent for the construction of an electricity generating station whose capacity exceeds 50 MW is significantly different from an application for planning permission for a generating station whose capacity is 50 MW or less.
- 1.3.2 Section 25 of the 1997 Act does not apply to the determination of applications under Section 36 of the 1989 Act, as confirmed in the case of *William Grant & Sons Distillers Ltd v Scottish Ministers* [2012] CSOH 98 (paragraphs 17 and 18).

- 1.3.3 Schedule 8 of the 1989 Act references consents under Section 36 and 37 of the Act. In addition, there are certain environmental duties in relation to preservation of amenity and fisheries provisions in Schedule 9, paragraph 3 that apply to the Scottish Ministers as decision maker.
- 1.3.4 The Applicant does not hold a generation licence under the 1989 Act and therefore the statutory duties set out in paragraph 3(1) of Schedule 9 to the 1989 Act do not apply. The Applicant has however, through the EIA process, had full regard to the matters set out in paragraph 3(1)(a) of Schedule 9.
- 1.3.5 The EIA Report identifies how various factors were taken into account in the formulation of the application. In addition, each EIA Report chapter includes assessment of the likely significant effects and also, where appropriate, the identification of appropriate mitigation. This includes both embedded mitigation which is integral to the design, construction and operation of the Proposed Development and also additional specific measures which have been identified, along with proposed monitoring as appropriate.
- 1.3.6 In accordance with paragraph 3(2) of Schedule 9 to the 1989 Act, the Scottish Ministers are obliged to have regard to the desirability of the matters mentioned in paragraph 3(1)(a). The Applicant has provided sufficient information to enable the Scottish Ministers to address their duties under sub-paragraph 3(1)(a) of Schedule 9 to the 1989 Act. The duty on the Ministers is to have regard to the matters specified in Schedule 9 which is not a development management test.
- 1.3.7 In considering the overall statutory and regulatory framework within which the Proposed Development should be assessed, the statutory Development Plan is a relevant consideration which should be taken into account in the round with all other relevant considerations. It is important to note, however, that Section 25 of the 1997 Act is not engaged as there is no 'primacy' of the Development Plan in determining an application made under the 1989 Act.

1.4 Site Location and Description

- 1.4.1 The Site covers an area of approximately 303 hectares ('ha') and is located on land east of SVT and the Shetland Gas Plant. The Site location is shown in **Figure 1.1: Site Location Plan**.
- 1.4.2 There are limited settlements within 1.5km the Site, comprising scattered dwellings, in areas such as Toft, Brough and Garths Voe. Small settlements such as Firth and Mossbank are located approximately 2.1km and 2.7km from the Site, respectively.
- 1.4.3 The Site comprises an undulating plateau that ranges in elevation from mean high-water level at its northernmost extent by Ay Wick, to approximately 110 m Above Ordnance Datum (AOD) at the Hill of Crooksetter located east of the centre of the Site. Towards the southern end of the Site, the topography gently undulates between 50 m and 90 m AOD. The Site is drained by a number of natural burns such as the Aywick Burn, along with artificial drainage ditches.
- 1.4.4 The Site comprises a combination of open heather moorland and grassland on peaty soils, which is used for rough grazing. The Site is typical of the wider landscape which exhibits a similar combination of hilly coastal terrain, small coastal islands and rocky coastal edges that mark the edge of the open waters of numerous voes. The Site is immediately adjacent to extensive industrialised areas in the form of SVT and the Shetland Gas Plant – these comprise expanses of concrete, vast networks of pipework, flare stacks, ancillary buildings and large storage tanks.
- 1.4.5 The northern extent of the Site overlaps with two designated sites, Yell Sound Special Area of Conservation (SAC) and Yell Sound Site of Special Scientific Interest (SSSI). The SAC also encompasses the coastline of SVT. One Scheduled Monument sits within the Site which is a prehistoric burial monument in the form of a chambered cairn, located to the north west of the summit of the Hill of Crooksetter.

Figure 1.1: Site Location Plan



1.5

The Proposed Development: Summary

1.5.1

The Proposed Development went through a number of iterations as described in **Chapter 3: Design Evolution and Alternatives (EIAR Chapter 2)** to arrive at the final layout. The final layout, the Proposed Development, is illustrated in **Figure 1.2: Proposed Development Layout** below.

1.5.2

A detailed description of the Proposed Development is contained in **Chapter 2: Description of the Proposed Development (EIAR Volume 2)**. In summary, the Proposed Development comprises of a renewable energy development with up to eight wind turbines and BESS, and associated infrastructure. The key component parts of the Proposed Development include the following:

- > up to eight wind turbines with a maximum blade tip height of 200 m;
- > wind turbine foundations;
- > permanent foundations supporting each wind turbine, and associated crane hardstanding at each wind turbine base;
- > new permanent on-site access tracks with associated water crossings and temporary access tracks to service the borrow pits during the construction phase.
- > a site entrance to the west of the Site for construction and operation, designed to accommodate abnormal indivisible loads ('AIL') required for turbine component delivery;
- > underground cable arrays within the Site connecting the turbines to the on-site substation;
- > an on-site substation and control building;
- > temporary construction compounds and laydown areas; and

- > a BESS, including ancillary equipment and co-located with the on-site substation.

1.5.3

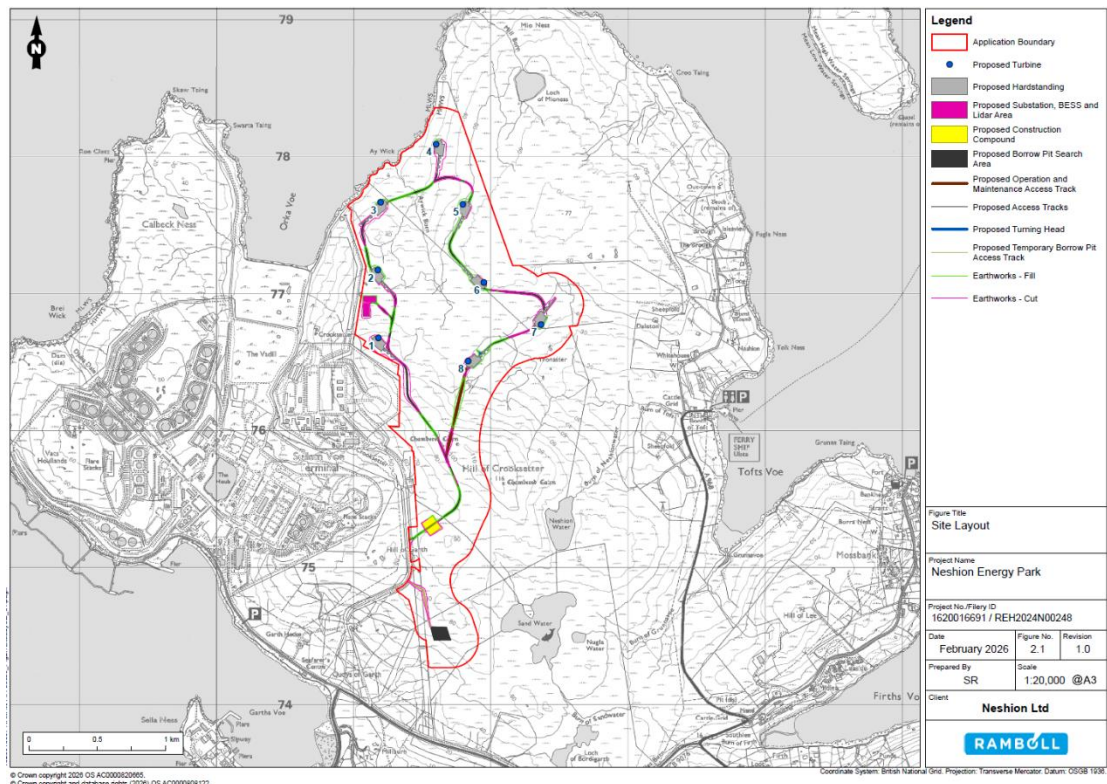
In addition, the following is are proposed:

- > habitat management areas including peatland habitat restoration;
- > extraction of rock from borrow pits and reinstatement of the borrow pits to an agreed restoration and design;
- > temporary on-site concrete batching plant;
- > off-site works to facilitate the delivery of abnormal loads (e.g. construction of over-run areas and temporary modification to street furniture etc); and
- > permanent meteorological mast, or hardstanding to accommodate remote sensing equipment to measure wind conditions.

1.5.4

The location of the proposed turbines and infrastructure would be subject to micro-siting. This process allows for minor changes to respond to possible local variations in ground conditions across the Site, which would only be confirmed following detailed site investigation work carried out immediately prior to construction. This process also provides scope for further mitigation of potential localised environmental effects through avoidance of sensitive features. A micro-siting distance of 100 m is proposed.

Figure 1.2: Proposed Development Layout



1.5.5

The Proposed Development would require visible aviation lighting under the current Civil Aviation Authority (CAA) policy statement¹. In order to mitigate the nighttime visual impact of the Proposed Development on non-aviation receptors a lighting scheme has been designed and has been assessed (as set out in **Technical Appendix 4.8: Aviation Lighting Impact Assessment (EIAR Volume 4)**).

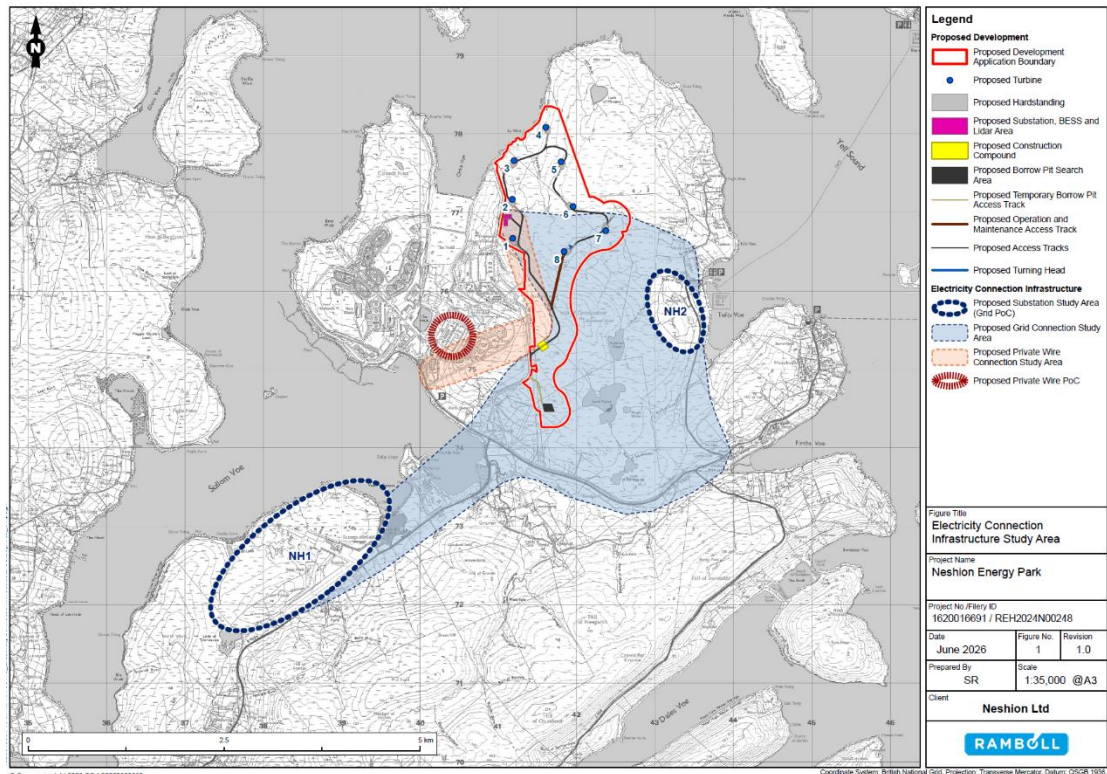
¹ CAA Policy and Guidelines on Wind Turbines, CAP 764 (Edition 7, 2025).

1.5.6 The expected operational lifespan of the Proposed Development is 40 years (from the date of commissioning).

Grid Connection

1.5.7 The Proposed Development would potentially have both a 'private-wire' connection to the neighbouring SVT to supply renewable electricity to a low carbon fuel plant at the terminal, and a connection to the electricity grid, as shown in **Figure 1.3**.

Figure 1.3: Potential Grid Connection Study Areas



1.5.8 The details of both connections are currently unknown and do not form part of the Proposed Development for purposes of the application for consent. However it is acknowledged that if the decision maker views the grid connection works and the proposed wind turbines, BESS and related infrastructure as a 'single project' for the purposes of EIA, then there is a need to consider the potential for likely significant effects in combination with the associated connection infrastructure, in so far as it is possible to do so based on the information available at the time of writing. An appraisal of both potential connections is provided in **Technical Appendix 2.4: Electricity Connection Infrastructure Appraisal (EIAR Volume 4)**.

1.6 Structure of Planning Statement

1.6.1 This Planning Statement is structured as follows:

- > **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework and includes reference to the Onshore Wind Policy Statement and the Scottish Government's draft Energy Strategy and Just Transition Plan;
- > **Chapter 3** describes the benefits of the Proposed Development;
- > **Chapter 4** appraises the Proposed Development against the most up to date element of the Development Plan, namely the relevant provisions of NPF4;
- > **Chapter 5** appraises the Proposed Development against the relevant provisions of the Local Development Plan and related guidance; and
- > **Chapter 6** examines the planning balance and presents overall conclusions.

2. The Renewable Energy Policy & Legislative Framework

2.1 Introduction

- 2.1.1 This chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK, and Scottish provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and greenhouse gas emissions (GHG) reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Development can draw a high level of support.
- 2.1.2 The Proposed Development requires to be considered against a background of material, UK and Scottish Government energy and climate policy and legislative provisions, as well as national planning policy and advice. These taken together provide very strong support for the Proposed Development in principle.
- 2.1.3 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.
- 2.1.4 UK and Scottish Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments is set out below. This is followed by reference to key UK level statutory and policy provisions and then a detailed description of relevant Scottish Government statutory and policy provisions is set out.

2.2 International Commitments

The Paris Agreement (2015)

- 2.2.1 In December 2015, 196 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference ('COP21'). It came into force in November 2016. The Paris Agreement within the United Nations Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of limiting the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C.
- 2.2.2 It is clear that moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links to the Climate Change Committee's ('CCC') advice to both the UK and Scottish Governments on 'net zero' targets which have now, at both the UK and Scottish levels, been translated into legislative provisions and targets for both 2045 (Scotland) and 2050 (UK). This is referred to below.
- 2.2.3 The Paris Agreement does not itself represent Government policy in the UK or Scotland. However, the purpose of domestic renewable energy and GHG reduction targets is to meet the UK's commitment in the Paris Agreement.

United Nations - Intergovernmental Panel on Climate Change

- 2.2.4 The Intergovernmental Panel on Climate Change ('IPCC') is the United Nations (UN) body for assessing the science related to climate change.

2.2.5 The IPCC prepares comprehensive assessment reports about the state of scientific, technical and socio-economic knowledge on climate change, its impacts and future risks and options for reducing the rate at which climate change is taking place. IPCC reports are commissioned by the world's Governments and are an agreed basis for COP² negotiations.

2.2.6 The IPCC's Special Report on Warming of 1.5°C, published in 2018, was a key piece of evidence for the CCC's recommendation to the UK Government for a 2050 net zero greenhouse gas emission target. The IPCC's reports since 2018 have provided estimates of how close global temperatures are to 1.5°C of warming above pre-industrial levels and the remaining volume of global cumulative carbon dioxide that could be emitted to be consistent with keeping global warming below any particular threshold (such as the 1.5°C and 2°C levels referred to in the Paris Agreement).

2.2.7 The IPCC's 6th Assessment Report was published in March 2023. The Summary for Policymakers Report (paragraph A.4 on page 10) states that it is likely that warming will exceed 1.5°C during the 21st century which will therefore make it harder to limit warming below 2°C. Page 24 of the report states *"There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence)"*.

COP 28, Dubai 2023

2.2.8 The United Nations Climate Change Conference ('COP28') closed on 13 December 2023. The UN press release of the same date states that the agreement reached *"Signals the 'beginning of the end' of the fossil fuel era by laying the ground for swift, just and equitable transition, underpinned by deep emissions cuts and scaled up finance."*

2.2.9 The statement adds:

"The stocktake recognises the science that indicates global greenhouse gas emissions need to be cut 43% by 2030, compared to 2019 levels, to limit global warming to 1.5°C. But it notes parties are off track when it comes to meeting their Paris Agreement goals."

The stocktake calls on parties to take actions towards achieving, at a global scale, a tripling of renewable energy capacity and doubling of energy efficiency improvements by 2030. The list also includes accelerating efforts towards the phase down of unabated coal power, phasing out inefficient fossil fuel subsidies, and other measures that drive the transition away from fossil fuels in energy systems, in a just, orderly and equitable manner, with developed countries continuing to take the lead." (underlining added)

COP 29, Baku 2024

2.2.10 The 29th UN Climate Conference hosted in Baku, Azerbaijan concluded on November 24th 2024. New financial goals at COP 29 will build on the significant strides on global action at COP 27, which agreed a historic Loss and Damage Fund, and COP 28, which delivered a global agreement to transition away from fossil fuels in energy systems in a swift and fair manner as well as triple renewable energy and boost climate resilience. The Climate Change Committee in its summation³ of the conference and finance agreement reached, noted that the new climate finance goal of at least \$300 billion per year from the developed world by 2035 was a compromise outcome, with some developing countries expressing frustration and disappointment. There was recognition of the much greater scale of overall finance needed, marking a shift to formally recognising the wider mobilisation required, which will only be achieved if climate change investment is mainstreamed into wider public and private finance flows.

² United Nations Framework Convention on Climate Change, Conference of the Parties ('COP').

³ Climate Change Committee (2024) COP29: Key outcomes and next steps for the UK.

- 2.2.11 Unlike COP 27 and 28 however, COP 29 reached an agreement on carbon markets which will help countries deliver their respective climate plans on a quicker and cheaper basis, as well as make faster progress in halving global emissions.

COP 30, Belém 2025

- 2.2.12 COP30 was the 2025 UN Climate Conference, held in Belém, Brazil, from November 10–21, 2025. The conference focused on implementing past agreements and key outcomes included a new "global mutirão" decision for collective action and a call to triple adaptation finance by 2035.
- 2.2.13 Despite support from over 80 countries (including the UK) for a "roadmap" toward phasing out fossil fuels, oil-producing nations voted against this being included from the formal deal and therefore no new "roadmaps" for phasing out fossil fuels were agreed upon. However, Colombia and the Netherlands will co-hosted the first International Conference on the Just Transition Away from Fossil Fuels in April 2026 in Santa Marta, Colombia. This initiative aims to build on the momentum from COP30 to create a roadmap for phasing out fossil fuels and to move this discussion outside of the formal UN COP negotiations.

UN Emissions Gap Report (2025)

- 2.2.14 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.
- 2.2.15 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions (NDCs) submitted ahead of COP30 in Brazil as follows (page xii):
- "As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive."*
- 2.2.16 Section 7 of the Executive Summary sets out that *"despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever"*.
- 2.2.17 The report adds: *"accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers....."*
- 2.2.18 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy, including wind energy, remains key to combating the climate emergency.

2.3 UK Climate Change & Energy Legislation & Policy

The Climate Emergency

- 2.3.1 A critical part of the response to the challenge of climate change was the climate emergency which was declared by the Scottish Government in April 2019 and by the UK Parliament in May 2019. The declaration of climate emergency needs to be viewed in the context in which it was declared (advice from the CCC), and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).

The Climate Change Act 2008 & Carbon Budgets

- 2.3.2 The Climate Change Act 2008 (the 2008 Act) provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050, with Scotland committing to net zero by 2045.
- 2.3.3 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.
- 2.3.4 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.
- 2.3.5 These legally binding ‘carbon budgets’ act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress⁴

Budget	Carbon budget level	Reduction below 1990 levels	Progress on Budgetary Period
1 st carbon budget (2008 – 2012)	3,018 MtCO ₂ e	26%	-27%
2 nd carbon budget (2013 – 2017)	2,782 MtCO ₂ e	32%	-42%
3 rd carbon budget (2018 – 2022)	2,544 MtCO ₂ e	38% by 2020	-50% ⁵
4 th carbon budget (2023 – 2027)	1,950 MtCO ₂ e	52% by 2025	n/a
5 th carbon budget (2028 – 2032)	1,725 MtCO ₂ e	57% by 2030	n/a
6 th carbon budget (2033 – 2037)	965 MtCO ₂ e	78% by 2035	n/a
7 th carbon budget (2038 – 2042)	535 MtCO ₂ e	87% by 2042	n/a
Net Zero Target	100%	By 2050	

- 2.3.6 The Sixth Carbon Budget (‘CB6’) requires a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels. This is seen as a world leading commitment, placing the UK “*decisively on the path to net zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement*” (CB6, page 13).

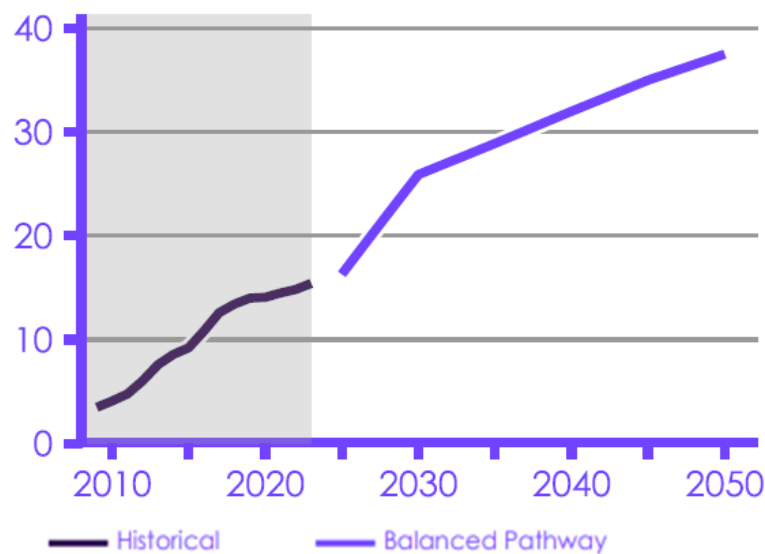
⁴ Source: CCC.

⁵ Confirmed by CCC in ‘Final Statement for the Third Carbon Budget’ May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

- 2.3.7 Key points from CB6 include:
- > UK climate targets cannot be met without strong policy action in Scotland.
 - > The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% by 2035 and double or even treble by 2050.
 - > CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.
 - > The related 'Methodology Report' from the CCC advice, states that in all scenarios for the carbon budget and looking ahead to 2050, the CCC sees new onshore wind generation being deployed by 2050. They set out that their modelling reflects this by almost doubling onshore wind capacity to 20-30 GW in all scenarios by 2050.
- 2.3.8 Following the CB6, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021 (the Order)⁶) to reduce emissions by 78% by 2035 compared to 1990 levels. This brought forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.
- 2.3.9 The Seventh Carbon Budget ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 MtCO₂e including emissions from international aviation and shipping.
- 2.3.10 Page 12 of the CB7 states:
- "By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture."*
- 2.3.11 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that *"this requires twice as much electricity as today by 2040"*.
- 2.3.12 In relation to onshore wind, capacity doubles to 32 GW. The anticipated growth of onshore wind capacity is shown in the report (page 109) and illustrated in **Figure 2.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'** below.

⁶ The Order sets the carbon budget for the 2033-2037 budgetary period at 965 million tonnes of carbon dioxide equivalent. The net UK carbon account is defined in section 27 of the Climate Change Act 2008.

Figure 2.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'

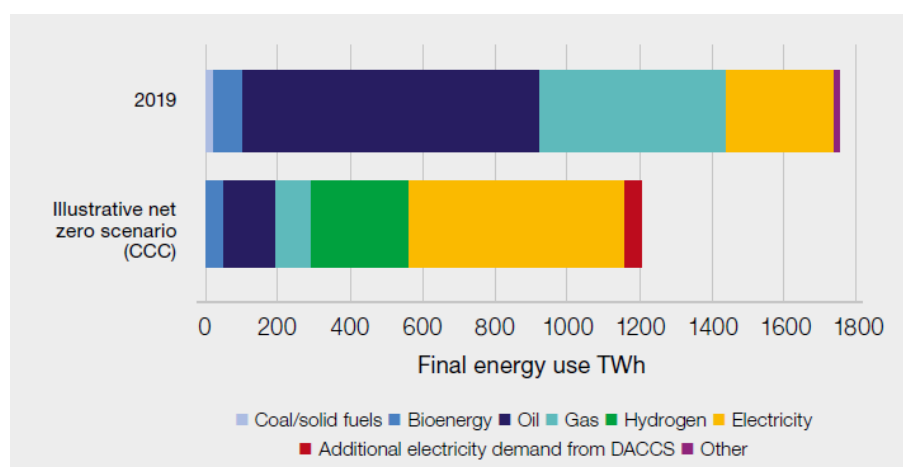


- 2.3.13 The report notes that this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual roll-out rates previously sustained during the mid-2010s.
- 2.3.14 The Balanced Pathway requires an average deployment rate of 0.8 GW per year, with deployment peaking at 1.9 GW in 2030, which is comparable to the historical peak of 1.8 GW in 2017.
- 2.3.15 CB7 states that *“there are a range of barriers that will need to be overcome to enable the levels of deployment required. This will require concerted action on several areas, including planning, grid connections, and supply chain bottlenecks.”*

The UK Energy White Paper (December 2020)

- 2.3.16 The Energy White Paper ‘Powering our Net Zero Future’ was published on 14 December 2020, and while more than five years old, at the time represented an important step in UK energy policy highlighting the importance of renewable electricity.
- 2.3.17 It sets out that *“electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050”*. A key objective was set out to *“accelerate the deployment of clean electricity generation through the 2020s”* (page 38).
- 2.3.18 Electricity demand is forecast to double out to 2050, which will *“require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target”* (page 42).
- 2.3.19 This anticipated growth of renewable electricity is illustrated in the graph below – **Figure 2.2: Illustrative UK Final Energy Use in 2050.**

Figure 2.2: Illustrative UK Final Energy Use in 2050⁷



2.3.20 **Figure 2.2: Illustrative UK Final Energy Use in 2050** illustrates that achieving net zero requires a significant increase in the use of electricity, all of which must be generated from low-carbon sources.

2.3.21 Whilst offshore renewables are expected to grow significantly, the White Paper also sets out that *“onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios”* (page 45). (underlining added)

The British Energy Security Strategy (April 2022)

2.3.22 The British Energy Security Strategy was published by the UK Government on 7 April 2022. It focuses on energy supply and states that in the future nuclear will have an expanded role and that renewables have an important role: the foreword states *inter alia*:

“Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables....

The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets.”

2.3.23 Reducing Scotland's and the wider UK's dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

The UK Battery Strategy (2023)

2.3.24 The UK Government published the UK Battery Strategy⁸ on 26 November 2023. The UK Battery Strategy brings together Government activity to achieve a globally competitive battery supply chain by 2030 that supports economic prosperity and the net zero transition in the UK.

2.3.25 In summary, the Government's vision is for the UK to continue to grow a thriving battery innovation system and to become a world leader in sustainable design, manufacture and use.

2.3.26 The UK Battery Strategy was developed with the UK Battery Strategy Task Force, drawing upon a call for evidence and engagement with business and stakeholders. It is based around

⁷ Source: Energy White Paper page 9 (2020).

⁸ UK Government (2023) The UK Battery Strategy Available at: <https://www.gov.uk/government/publications/uk-battery-strategy>

the 'design, build, sustain' approach and through the strategy sets the key objectives that the UK will:

- > Design and develop batteries for the future;
- > Strengthen the resilience of UK manufacturing supply chains; and
- > Enable the development of a sustainable battery industry.

2.3.27 In the Foreword to the document (page 3), the Minister of State for Industry and Economic Security at the Department of Business and Trade states that:

"Batteries will play an essential role in our energy transition and our ability to successfully achieve Net Zero by 2050."

2.3.28 Batteries are seen as key to the net zero transition as they enable more flexible use of energy such as maximising use of intermittent low carbon generation.

Climate Change Committee Report to UK Parliament (June 2025)

2.3.29 The CCC published its report 'Progress in reducing emissions – 2025 Report to Parliament' (the CCC 2025 Report) in June 2025. It highlights that *"greenhouse gas emissions have more than halved since 1990, with the pace of reduction having more than doubled since the introduction of the UK's Climate Change Act in 2008"* (page 10).

2.3.30 The CCC 2025 Report identifies ten priority actions for the year 2025-2026, one of which is:

"Effectively deliver rapid expansion of the low-carbon electricity system. An effective Allocation Round 7 will be critical to achieving this, given that projects typically take several years to come onstream." (page 19)

2.3.31 The CCC 2025 Report highlights that renewable electricity generation expanded more in 2024 than in any of the previous six years, driven by wind and solar. However, the pace still needs to accelerate significantly to meet 2030 goals. This will require a tripling in annual installations of both offshore and onshore wind and a four-fold increase in solar compared to the average rate seen since the start of the decade.

2.3.32 Total operational capacity for onshore wind in the UK was 16 GW in 2024, and further capacity is currently contracted to bring total capacity to 20 GW by 2027. The report goes on to state in relation to reaching the 27GW 2030 target (UK) for onshore wind, which is the lower end of the Government's capacity range, *"will require more than 1.8 GW to be added each year on average, the same as the peak seen in 2017. However, only 0.8 GW of onshore wind was installed in 2024. Onshore wind installation rates will need to triple compared to the average pace of deployment since the start of the decade."* (page 60)

2.3.33 In terms of the required emissions savings to achieve the 2030 Nationally Determined Contributions (NDC) the CCC 2025 Report highlights some risks. One of which include *"delivery risks for planning, grid connections, and successful Contracts for Difference auctions to deliver the rest of the renewables deployment required by 2030 under the Clean Power 2030 Action Plan"*. (page 17)

2.3.34 On page 105, the role of low carbon electricity is highlighted further in reducing emissions. In the Committee's Seventh Carbon Budget advice, 60% of the required emissions reduction is delivered through electrification and low-carbon electricity. The CCC 2025 Report sets out at Box 3.5:

"Delivering this requires continued growth of renewables deployment over the coming years, to ensure a rapid scale-up in supply of low-carbon electricity."

- > *Renewable generation from wind and solar is well established and is the cheapest form of new electricity generation capacity.*
- > *The UK also benefits from extensive wind resources.*

- > *As such, renewables have an essential role to play in achieving Net Zero and meeting the vast majority of demand in the Balanced Pathway. This will require strong and sustained deployment of renewables capacity...*
- > *These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process."*

- 2.3.35 In relation to transmission and grid readiness, these are highlighted as critical enablers for renewable deployment and electrification.
- 2.3.36 The CCC 2025 Report notes that transmission network development is progressing, but timely delivery depends on removing barriers in planning; supply chains; and access to grid connections.
- 2.3.37 The CCC 2025 Report repeatedly stresses that electrification of transport, buildings, and industry depends on a rapidly expanding and decarbonised grid. Without faster grid upgrades this will result in renewable projects risk delays, electrification of heat and transport could stall, and the UK may miss its 2030 NDC.

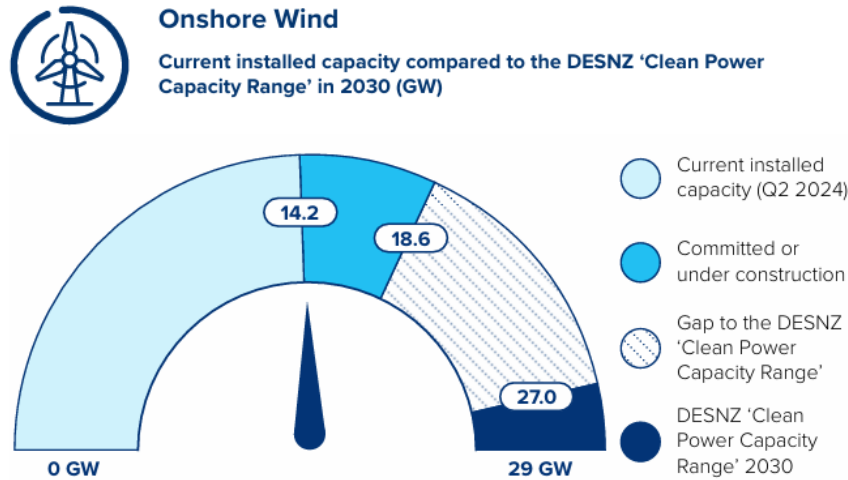
Labour Government & Commitment to Renewables (2024)

- 2.3.38 The UK Government changed at Westminster in 2024 and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to Net Zero.
- 2.3.39 Energy policy is reserved to Westminster and although the Scottish Government has progressed its own energy policy in parallel with its full devolved authority over the planning system in Scotland, UK Government policy is an important material consideration.
- 2.3.40 The Department for Energy Security and Net Zero (DESNZ) issued a Statement on 8 July 2024 which included references to doubling UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030.

UK Government: Clean Power 2030 Action Plan (2024)

- 2.3.41 The Clean Power 2030 Action Plan was published by DESNZ in December 2024. It sets out (page 9) that Britain needs to install "*clean sources of power at a pace never previously achieved*". It further adds (page 10):
- "Clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals".*
- 2.3.42 Within the Action Plan, it sets out that by 2030 there should be 27-29 GW of onshore wind operational within the UK. At the time of the publication of Clean Power 2030, there was only 14.2 GW of installed onshore wind capacity in the UK, illustrated in **Figure 2.3: Onshore Wind & 'Gap' to reach 2030 UK Target** below. It also illustrates the gap between the onshore wind installed capacity (at that time) compared to the DESNZ requirement to 2030.

Figure 2.3: Onshore Wind & 'Gap' to reach 2030 UK Target



2.3.43 Renewable UK's Onshore Wind Report⁹ indicates that in September 2025 the UK had 15.8 GW of onshore wind capacity in operation.

2.3.44 The document adds that *"Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also via the application of clean power in the buildings, transport and industry sectors... The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity"*.

2.3.45 Page 74 of the Action Plan states that *"Meeting the renewable capacity set out in the DESNZ 'clean power capacity range' is achievable but will require deployment at a sharply accelerated scale and pace"*.

The Onshore Wind Taskforce Strategy (July 2025)

2.3.46 DESNZ published the Onshore Wind Taskforce Strategy in July 2025. The strategy sets out over 40 actions, primarily Government commitments to resolve key blocks to onshore wind within the UK. The Strategy's overall aims are to boost onshore wind deployment and to deliver economic benefits for local communities, businesses and the consumer.

2.3.47 The Ministerial Foreword by the Secretary of State for Energy Security and Net Zero states:

"As one of the cheapest and fastest to build sources of power we have, onshore wind will play a critical role in boosting our energy independence with clean power by 2030. The reality is that every turbine we build helps protect families, businesses and the public finances from future fossil fuel shocks.

That's why in our first 72 hours in office, we lifted the onshore wind band in England - in place for nine years under the previous Government. And it's why last July we established the Onshore Wind Taskforce to bring Government, industry and trade unions together to explore how we can radically accelerate deployment of this critical technology.

The Onshore Wind Taskforce strategy is the outcome of that work. It sets out more than 40 steps Government and industry will take to help deliver up to 29GW of onshore wind by 2030. That includes driving ambitious reforms to planning, grid connections, and routes to market, while building the supply chains and skilled workforce we need."

2.3.48 In addition, within the foreword the statement by the Head of Clean Power 2030 within DESNZ states *inter alia*:

⁹ Renewable UK (2025) Onshore wind pipeline report 2025.

“Clean Power 2030 is our ambitious mission to grow rapidly Britain's clean electricity infrastructure, reducing Britain's dependency on imported oil and gas, securing key clean industries and readying the country for the expected growth in electrical demand over the next 20 years.

Our Clean Power Action Plan targets a near doubling of onshore wind capacity up to 29GW by 2030. That will require rapid development of new onshore wind across Britain and repowering of existing sites to bring British consumers some of the cheapest homegrown power that can be produced. We are already working with NESO to slash the queue of projects waiting to connect to the grid to accelerate the best onshore wind development.

Rapid deployment of onshore wind is our first line of defence against future gas price spikes - every megawatt added displaces imported gas in the power system. With the steps in this new strategy, we will cement the growth of an important homegrown industry. The momentum behind clean power continues to grow.”

2.3.49 The various commitments and actions within the strategy cover:

- > Scoping, planning and consenting improvement for onshore wind projects;
- > Networks and systems reform;
- > Communities and public perception actions;
- > Aviation and defence commitments to improve the interface between wind energy and civil and military radar and related matters;
- > Finance and routes to market; and
- > Supply chains, skills and workforce.

2.3.50 The strategy refers to the Government's Clean Power Action Plan, which was published in December 2024 and which set out a pathway to achieving the mission of clean power by 2030. Page 10 of the strategy states that:

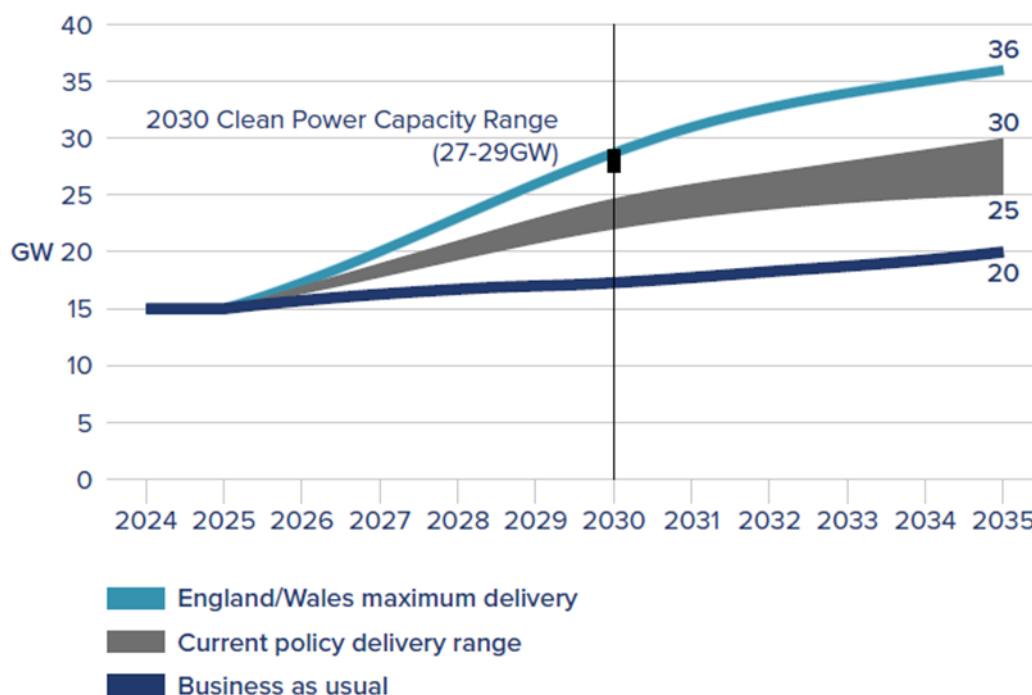
“All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB. That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)”.

2.3.51 It is explained that the delivery of up to 29 GW of onshore wind by 2030 would involve around 10-12 GW more than would have been deployed under historic growth rates, with England contributing around 2 GW by 2030.

2.3.52 The strategy also emphasises the significant economic opportunity that further onshore wind deployment will deliver (page 10). It states that meeting the onshore wind 2030 targets together with the actions within the strategy, could deliver up to 45,000 direct and indirect jobs in Great Britain and result in £70 million per year of extra investment in community benefits.

2.3.53 At page 18 of the strategy, reference is made to illustrative deployment scenarios which it states emphasises *“the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales.”* This is illustrated in **Figure 2.4: Clean Power Deployment Scenarios (Onshore Wind)** below (reproduction of Figure 5 from the strategy).

Figure 2.4: Clean Power Deployment Scenarios (Onshore Wind)



- 2.3.54 The scenarios as illustrated in **Figure 2.4: Clean Power Deployment Scenarios (Onshore Wind)** include:
- > *Business as usual* - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.
 - > *Current policy delivery range* - this assumes the “seamless implementation” of the reform announced as part of the Clean Power 2030 Action Plan and the actions set out in the Onshore Wind Taskforce Strategy. In this scenario up to around 25 GW is installed by 2030 and 30 GW by 2035.
 - > *England / Wales maximum delivery* - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.
- 2.3.55 The strategy addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030.
- Government Statement on Energy Security (March 2026)**
- 2.3.56 The Energy Secretary (The Right Hon Ed Miliband MP) issued a statement on 15 March 2026 outlining a package of measures to go “further and faster” in the pursuit of national energy security, as a response to events in the Middle East. The Energy Secretary announced various energy interventions to boost the UK’s energy security, including relating to solar deployment and stated an intention to bring forward the Government’s next annual renewables option to July 2026. The Energy Secretary stated:
- “Global events demonstrate there is not a moment to waste in our drive for clean power because there can be no energy security while we are so dependent on fossil fuels... everything we are doing is about one purpose: fighting the corner of the British people by taking back control of our energy”.*

2.4 Scotland: Climate Change & Emissions Reduction Legislation

The Climate Change (Scotland) Act 2009 and The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

- 2.4.1 The Scottish Government has in place a legal framework to decarbonise and reduce emissions. Most notably, the Scottish Government has a statutory target to achieve “net zero” by 2045. It is clear that to have any hope of achieving the net zero target, significant expansion of renewable generation capacity is required.
- 2.4.2 When it was enacted, the Climate Change (Scotland) Act 2009¹⁰ set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019¹¹ amended the 2009 Act, setting even more ambitious targets to reach net zero by 2045.
- 2.4.3 Scotland will need significant expansion of renewable generation capacity to achieve these ambitious targets by 2045.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

- 2.4.4 The Climate Change (Emission Reduction Targets) (Scotland) Act 2024¹² received Royal Assent on 22 November 2024 (the 2024 Act) and was brought into force the following day. The 2024 Act repealed the annual and interim emissions reduction target framework that was established under the 2009 Act and establishes a carbon budget approach to target setting, with budgets to be set through secondary legislation using the latest advice from the CCC, to replace the concept of statutory annual and interim targets. The 2024 Act also makes provision for a new Climate Change Plan to be published that reflects the carbon budgets.
- 2.4.5 The 2024 Act followed advice from the CCC that Scotland’s interim emissions reduction target for 2030 could not be achieved (explained above). The Act does not change the existing statutory target of net zero emissions by 2045.
- 2.4.6 The emissions reductions targets set out are significant and the 2009 Act states the Scottish Ministers have a duty to ensure the targets are met. The Scottish Ministers have duties to keep the Scottish Parliament informed about whether the targets are being met and to publish plans for meeting those targets. All Scottish public authorities also have a duty to exercise their functions in a way best calculated to contribute to the delivery of the targets.

CCC Report, Scotland’s Carbon Budgets, Advice for the Scottish Government (May 2025)

- 2.4.7 This CCC Report¹³ was published in May 2025, and it sets out the CCC’s advice on the level of Scotland’s four proposed carbon budgets, covering the period 2026 to 2045.
- 2.4.8 The report states that getting to net zero by 2045 will require immediate action, at pace and scale and adds that decisions on the exact pathway and policies are for the Scottish Government.
- 2.4.9 The report explains that progress to date has largely come from electricity decarbonisation, reflecting Scotland’s abundant renewable resources. It goes on to state (page 9) that:

¹⁰ Scottish Government (2009 Climate Change (Scotland) Act 2009)
<https://www.legislation.gov.uk/asp/2009/12/contents>

¹¹ Scottish Government (2019) Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
Available at: <https://www.legislation.gov.uk/asp/2019/15/contents>

¹² Scottish Government (2024) Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.

¹³ CCC (2025) Scotland’s Carbon Budgets

“Action will increasingly be required in predominantly devolved policy areas to hit the Net Zero 2045 target and the proposed carbon budgets. Now that the framework for climate action has been reset, the Scottish Government has the opportunity to use its powers to match its ambitions with action.”

- 2.4.10 The report identifies priority actions, which over the period of the first two carbon budgets will be the remaining decarbonisation of electricity generation as well as further electrification of key technologies, particularly the roll-out of EVs and heat pumps.
- 2.4.11 The report identifies the sources of future emissions reductions and notes that in the next decade, over the next two carbon budgets, they are predominantly met from electrification of key technologies across the economy and measures to reduce demand for high-carbon activities.
- 2.4.12 Specifically in relation to electricity and low carbon supply the Executive Summary explains (page 12) that in the Balanced Pathway set out by the CCC:
- “the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15 GW in 2023 to 49 GW by 2035, **increasing to 66 GW by 2045**. This provides 98% of electricity generation in Scotland in 2035 and caters for increasing demand in Scotland and the rest of Great Britain (GB). Grid storage, use of storable fuels on the GB-wide network, and smart demand flexibility ensure a reliable supply of electricity even in adverse weather years. These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process. To deliver clean electricity, the planning process to approve large electricity infrastructure projects in Scotland needs to be urgently improved.”* (emphasis added)
- 2.4.13 Scotland currently has approximately 17.9 GW¹⁴ of renewables operating capacity. Therefore, to achieve the Balanced Pathway figure of 66 GW by 2045 will require an approximate additional 48.1 GW to be deployed. This would equate to approximately 2.5 GW of operating capacity coming online each year over the next 19 years.
- 2.4.14 The report sets out in more detail the key actions to deliver the Balanced Pathway in electricity supply. At page 94 it refers to the key action for the Scottish Government which is to *“Urgently improve the planning process to approve large electricity infrastructure projects in Scotland, such as transmission lines and onshore wind farms.”* citing that it can currently take up to four years to approve large electricity infrastructure projects in Scotland.

Climate Report to Scottish Parliament - Progress in reducing emissions in Scotland (February 2026)

- 2.4.15 The CCC produced a report to the Scottish Parliament entitled ‘Progress in reducing emissions in Scotland’¹⁵ in February 2026 (‘CCC 2026 Report’). The CCC assessment of the Scottish Government’s progress in reducing emissions found that there are ‘credible plans’ and ‘plans with only some risks’ in place for 91% of the emissions reduction needed to achieve Scotland’s First Carbon Budget (2026 to 2030). Action in several areas has improved in the last two years. Achievements include a rise in the roll-out of electric vehicles and related charging infrastructure, as well as the highest rates of peatland restoration seen to date.
- 2.4.16 The CCC 2026 Report acknowledges the progress made stating that *“the Scottish Government and Scottish Parliament have made rapid progress in legislating the levels of the four carbon budgets, covering the period 2026 to 2045.”* This was secured through the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 (‘2025 Regulations’) which came into force on the 10th October 2025.
- 2.4.17 The carbon budgets are set such that the average annual level of emissions will be:

¹⁴ Scottish Government, Energy Statistics for Scotland – Q4 2025(April 2026).

¹⁵ CCC (2026) Progress in reducing emissions in Scotland.

- > 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030), implying a 12% reduction from levels in 2023.
- > 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035), implying a 36% reduction from levels in 2023.
- > 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040), implying a 59% reduction from levels in 2023.
- > 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045), implying an 88% reduction from levels in 2023.

- 2.4.18 The CCC 2026 Report welcomed the publication by the Scottish Government of its draft Climate Change Plan in November 2025 *“setting out – for the first time – policies and plans with quantified emissions reductions attached to policy outcomes across all sectors of the economy and providing an emissions pathway that achieves the carbon budgets.”* (page 10)
- 2.4.19 However, the CCC highlight that the draft CCP *“does not include deployment pathways for each key indicator. Nor does it include annual sectoral emissions pathways, with only carbon budget averages given...The framework in the final CCP should include indicative annual sectoral emissions and indicator pathways, so that progress can be effectively monitored.”*
- 2.4.20 In relation to Energy supply the CCC 2026 Report states that (page 20):

“deployment of variable renewable electricity generation is continuing to increase in Scotland, with 1.1 GW of offshore and 1.3 GW of onshore wind capacity deployed in 2024. Remaining emissions in electricity generation come predominantly from the Peterhead gas-fired power station. Reducing emissions further relies on the continued roll-out of wind and solar generation and of network capacity to accommodate it. The draft CCP sets out plans to replace Peterhead with a CCS-enabled gas plant.”
- 2.4.21 The CCC 2026 Report states that *“Scotland will need to continue its strong progress in rolling out renewable electricity generation and ensure development of electricity networks can keep pace. The Scottish Government should act to accelerate planning and consenting for transmission infrastructure to achieve this.”* (page 22)
- 2.4.22 At page 77 this is discussed in further detail and it notes that *“To achieve the Scottish Government’s target of 20 GW of onshore wind by 2030, nearly 10 GW needs to be installed in the next five years, which would be a doubling of capacity. This equates to a rate of deployment approximately two and a half times higher than the average annual deployment in 2023 and 2024.”*
- 2.4.23 The CCC 2026 Report acknowledges the progress in emission reductions relating to the energy supply noting that *“around two-thirds of the emissions reductions seen since the introduction of the Act in 2009 have been in the energy supply sector. Electricity supply in Scotland is now almost fully decarbonised”.* (page 58)
- 2.4.24 However, it goes on to state that *“further expanding low-carbon generation and supporting transmission network infrastructure in Scotland remains critical to enable decarbonisation of other sectors and to supply low-carbon electricity to the rest of the UK.”* (page 58)
- 2.4.25 The CCC call on the Scottish Government to enable *“rapid expansion of renewable energy and ensure timely planning approval of the transmission infrastructure required to move power from generation sites to where it will be used”.* (page 108)
- 2.4.26 The CCC 2026 Report identified positive progress over the last year in securing emissions reduction but identifies more to do, including continued deployment of renewable energy infrastructure to support the route to net zero by 2045.

2.5 Scotland: Climate Change and Renewable Energy Policy

2.5.1 The sections which follow, 2.6-2.11, address the key Scottish Government climate change and energy policy and related documents. These are:

- > The Scottish Energy Strategy (2017);
- > The Onshore Wind Policy Statement (2022);
- > The Draft Energy Strategy and Just Transition Plan (2023);
- > The Green Industrial Strategy (2024); and
- > The Climate Change Plan (2026).

2.6 The Scottish Energy Strategy (2017)

2.6.1 The Scottish Energy Strategy (SES) was published in December 2017. The SES preceded almost all of the important events and publications referred to above but nevertheless sets out that onshore wind is recognised as a key contributor to the delivery of renewable energy targets – specifically 50% of energy to be attained from renewable sources by 2030. The SES did not and could not take account of what may be required in terms of additional renewable generation capacity to attain the new legally binding ‘net zero’ targets so it is out of date in that respect.

2.6.2 The SES refers to “Renewable and Low Carbon Solutions” as a strategic priority (page 41) and states *“we will continue to champion and explore the potential of Scotland’s huge renewable energy resource, its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reduction targets”*.

2.6.3 The SES sets out what is termed the “opportunity” for onshore wind and there is explicit recognition that onshore wind is amongst the lowest cost forms of power generation. It is also recognised as *“a vital component of the huge industrial opportunity that renewables creates for Scotland”*.

2.6.4 The SES sets out the Government’s clear position on onshore wind namely:

“our energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland’s future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand.” (page 44)

2.7 The Onshore Wind Policy Statement (2022)

2.7.1 The Scottish Government published an updated Onshore Wind Policy Statement (OWPS) on 21st December 2022.

2.7.2 The Ministerial Foreword makes it clear that seeking greater security of supply and lower cost electricity generation are now key drivers alongside the need to deal with the climate emergency. In this regard, the Cabinet Secretary for Net Zero, Energy and Transport states (page 3):

“that is why we must accelerate our transition towards a net zero society. Scotland already has some of the most ambitious targets in the world to meet net zero but we must go further and faster to protect future generations from the spectre of irreversible climate damage”.

“Scotland has been a frontrunner in onshore wind and, while other renewable technologies are starting to reach commercial maturity, continued deployment of onshore wind will be key to ensuring our 2030 targets are met”.

2.7.3 The Foreword states that onshore wind has the ability to be deployed quickly, is good value for consumers and is also widely supported by the public. The Minister further states that:

"This Statement, which is the culmination of an extensive consultative process with industry, our statutory consultees and the public, sets an overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030."

- 2.7.4 The OWPS is structured on the basis of eight chapters which contain a mix of policy guidance and also technical information. Key content of relevance to the Proposed Development is referenced below.

Increasing the Rate of Deployment & Forecast Increase in Electricity Demand

- 2.7.5 Chapter 1 "Ambitions and Aspirations" (page 5) refers to current deployment of onshore wind in Scotland and states:

"We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes."

- 2.7.6 It is explained that National Grid's Future Energy Scenarios¹⁶ project concludes that Scotland's peak demand for electricity will at least double within the next two decades and that this will require a substantial increase in installed capacity across all renewable technologies.

Onshore Wind Target & Development Pipeline

- 2.7.7 In terms of existing deployment, paragraph 1.1.5 of the OWPS states that as of June 2022 the UK had 14.6 GW of installed onshore wind, with around 8.7 GW of this capacity within Scotland. Reference is made to a figure of 11.3 GW of onshore wind *"currently in the pipeline, spread over 217 potential projects"*.

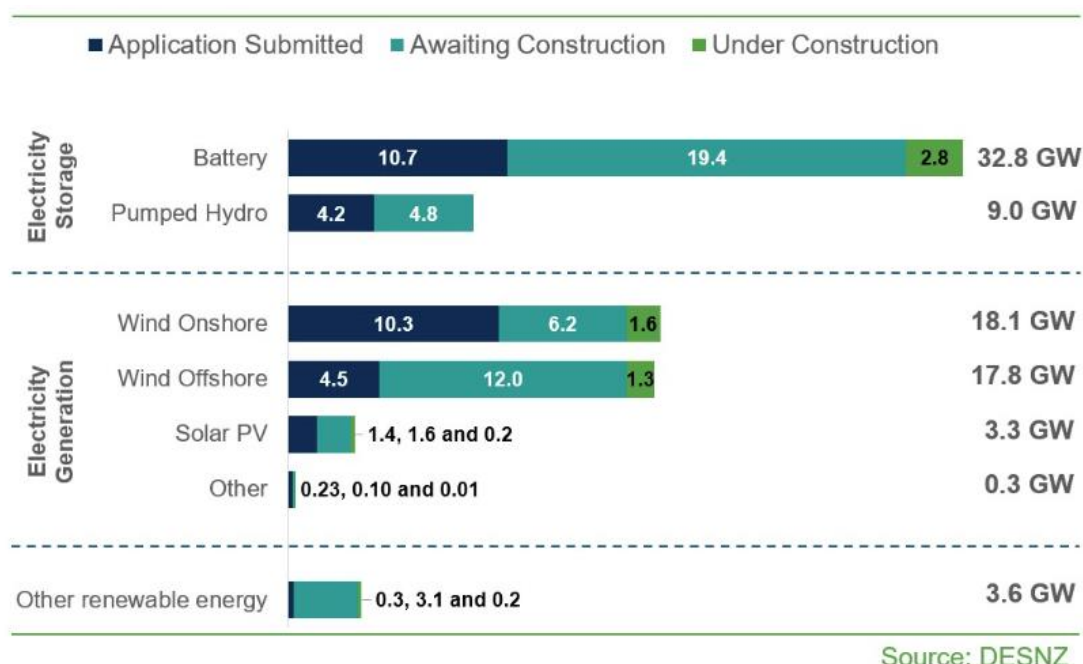
- 2.7.8 Updated figures on deployment and pipeline are provided by the Scottish Government in the Energy Statistics for Scotland which are released quarterly. The most recent statistics were published in April 2026 for Q4 of 2025. Figure 2 from the statistics illustrates that Scotland had 10.5 GW of installed onshore wind capacity as of the end of December 2025.

- 2.7.9 In terms of development pipeline, Figure 3 (reproduced below as **Figure 2.5: Estimated Capacity (GW) by technology and planning stage for renewable energy projects in pipeline as of end December 2025**) illustrates that 18.1 GW of onshore capacity was at Application stage; Awaiting construction or Under construction. The majority of capacity, 10.3 GW, was at Application stage, with 6.2 GW Consented / Awaiting construction, and 2.8 GW Under construction.

- 2.7.10 This means that 13.3 GW of onshore wind is committed (i.e. operational and under construction). There are no guarantees that the 6.2 GW of consented projects will all be built out for various reasons. Although other schemes are likely to be consented, it is important to reiterate that the 20 GW is not a cap and is a minimum target, not forgetting the wider generation and emission reduction targets beyond 2030 that still need to be met.

¹⁶ National Grid has set out a range of different, credible ways to decarbonise the energy system with regard to attaining Net Zero for the UK by 2050.

Figure 2.5: Estimated Capacity (GW) by technology and planning stage for renewable energy projects in pipeline as of end December 2025



2.7.11 The footnote to the figures set out on page 6 of the OWPS remains pertinent and is as follows:

"Developments in the planning/consenting process have not yet been considered and given permission to proceed. Some of these projects will receive consent, but some may not, and it is unlikely that all of this noted capacity will be fully realised. A degree of duplication within the planning system must also be considered, where developments which have consent re-apply to adjust the parameters of that consent. This will also reduce the capacity which is deliverable from this overall figure".

Government commitment to 20 GW of Onshore Wind by 2030

2.7.12 Section 1.2 of the OWPS refers to the Deployment Ambition to 2030. Reference is made to the CCC's position as set out in their exploratory scenarios for emissions to 2050 and also as referred to within the Sixth Carbon Budget.

2.7.13 Paragraph 1.2.2 of the OWPS states that: "[the explanatory scenarios] estimate that, in every scenario, the UK will require a total of 25-30 GW of installed onshore wind capacity by 2050 to meet government targets - which would mean doubling the current UK installed capacity".

2.7.14 Section 1.3 of the OWPS further refers to the new 20 GW ambition and acknowledges that the Scottish Government's Programme for Government 2022/2023 committed Government to enabling up to 12 GW of onshore wind to be developed. The Programme for Government stated that:

"It is vital to send a strong signal and set a clear expectation on what we believe onshore wind capacity will contribute in the coming years.

In line with this commitment, and reflecting the natural life cycles of existing wind farms, this statement sets a new ambition for the deployment of onshore wind in Scotland:

A minimum installed capacity of 20 GW of onshore wind in Scotland by 2030.

This ambition will help support the rapid decarbonisation of our energy system, and the sectors which depend upon it, as well as aligning with a just transition to net zero whilst other technologies reach maturity".

- 2.7.15 This statement is followed by reference to the "Legislative Context", in particular the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the related net zero greenhouse gas emissions targets. The OWPS states (paragraph 1.4.1) *"meeting these targets will require decisive and meaningful action across all sectors"*.
- 2.7.16 Paragraph 2.4.2 of the OWPS states that *"onshore wind will play a crucial role in delivering our legally binding climate change targets"*.
- 2.7.17 The OWPS has made clear that the 20 GW ambition of installed capacity is a "minimum" (page 6). In short, there is a substantial shortfall to address in order to attain that figure and projects that are not yet in the planning system are unlikely to provide installed capacity by 2030. This underlines the importance of the benefits that the Proposed Development can deliver – namely near-term delivery of a substantial volume of installed capacity.
- 2.7.18 Based on current installed capacity, there is a shortfall of 2.2 GW of onshore wind resource required to be met by 2030. The Proposed Development and its contribution must be considered in the context of the scale and urgency of the stated Scottish Government policy position.

Delivering the Government's 20 GW Ambition for Onshore Wind

- 2.7.19 Chapter 2 of the OWPS entitled 'Delivering on our Ambition for Onshore Wind in Scotland' states that the Scottish Government is to form an Onshore Wind Strategic Leadership Group ('SLG') and *"will task this SLG with taking forward the aspirations of this policy statement, and the development of an Onshore Wind Sector Deal"*. This reflects the importance of the onshore wind sector.
- 2.7.20 Section 2.3 refers to a "Vision for Onshore Wind in Scotland" and states that Scottish Renewables, on behalf of the sector in Scotland, has produced a Vision Statement which the Government considers *"to lay the basis of a more detailed sector deal that the SLG will develop"*.
- 2.7.21 The Onshore Wind Sector Deal was finalised and published in September 2023 and is referenced further below.
- 2.7.22 The **Vision Statement** is contained within Annex 5 of the OWPS (page 66). A summary of the Vision for the onshore wind industry in Scotland is a future where:
- > An additional 12 GW of new onshore wind generation is constructed by 2030.
 - > Onshore wind continues to play a key role in decarbonising the power sector, reducing consumer costs and ensuring security of supply whilst playing a key role in the electrification of heat and transport.
 - > The selection of wind farm locations and technologies enables the use of the most productive modern turbines and balances the need to respect biodiversity and natural heritage.
 - > Land use for onshore wind is optimised and combined with other initiatives including reforestation and peatland restoration, as well as providing enhanced access to green space for recreation.
 - > New and repowering projects consistently receive high levels of public support.
 - > High skilled and sustainable jobs are created, including long term jobs in the operational phase.

- > Material use is optimised, and carbon impact is minimised, through the principles of a circular economy.
- > Community benefit and shared ownership provides lasting social and economic benefits; and
- > Onshore wind plays a central role in ensuring a just transition for communities and people.

2.7.23 The Vision Statement states (page 67) that:

“Onshore wind remains vital to meeting this increasing demand, providing fast deployment whilst minimising cost to the consumer. This will be achieved by deploying the most productive modern turbines that are taller than older models, by re-powering existing sites where possible and by maximising the use of our exceptional natural wind resource where environmental effects are acceptable.”

Balancing Environmental Considerations and Benefits

2.7.24 Chapter 3 of the OWPS “Environmental Considerations: Achieving Balance and Maximising Benefits” refers to matters relating to specific environmental topics as follows:

- > Shared Land Use;
- > Peat and Carbon-Rich Soils;
- > Forestry;
- > Biodiversity;
- > Landscape and Visual Amenity; and
- > Noise.

2.7.25 Section 3.2 Shared Land Use highlights the varying demands on land in Scotland, noting that a balance must be struck to best serve Scotland’s net zero ambitions. Reference is made to the Land Use Strategy (2021), which states that:

“Our land contributes to climate change mitigation in many ways. Scotland has a long and positive history of harnessing renewable energy and our capacity to generate it will need to be increased to meet our net zero targets. Our energy will continue to be provided by a wide and diverse range of renewable technologies, including onshore wind. We will need to continue to develop wind farms, in the right places...”

2.7.26 Section 3.3 addresses peat and carbon rich soils. It highlights that approximately 75% of Scotland’s peatlands are degraded through drainage, extraction and other actions. It explains that reversing degradation through peatland restoration is central to mitigating and adapting to the linked climate and nature crises.

2.7.27 Paragraph 3.3.6 states: *“The continued deployment of onshore wind and restoration of peatlands and carbon rich soil will both play vital roles in delivering Scotland’s emissions reductions targets.... Given the established need for additional onshore wind turbines to tackle climate change and to ensure long term availability of cheap, renewable energy, in some cases it may be necessary to construct onshore wind farms on areas of peat”*.

2.7.28 The document goes on to explain that the onshore wind sector has made remarkable advances over the past decade in mitigation and restoration solutions for peatland. It states that the identification of the condition of existing peatland is a vital part of the wind farm design process and bespoke management plans have an important role. It adds that *“by assessing the net carbon impacts of proposed developments on carbon rich soils and peatlands we will ensure that planning and consenting regimes result in the right projects in the right places, with all applications considered on a case-by-case basis within the relevant planning regime.”* (paragraph 3.3.13)

- 2.7.29 Section 3.5 addresses biodiversity and paragraph 3.5.6 states that “*as the rate of onshore wind deployment increases in the coming years, we see a great opportunity for wind energy developments to further contribute significantly to our biodiversity ambition. By proactively managing intact habitats and the species they support, restoring degraded areas and improving connectivity between nature rich areas, onshore wind projects will contribute to our climate change targets and help address the biodiversity crisis*”. (paragraph 3.5.6)
- 2.7.30 Landscape and Visual Amenity is addressed at Section 3.6 with direct cross references to NPF4. Paragraph 3.6.1 states (original emphasis):

“*Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape.*”
- 2.7.31 As referenced below, NPF4 policy 11 expressly recognises that significant landscape and visual impacts are to be expected and the OWPS emphasises that as a result there will be changes in Scotland’s landscape.
- 2.7.32 Paragraph 3.6.2 of the OWPS, in cross-referencing NPF4, makes it clear that outside of National Parks and National Scenic Areas “*the criteria for assessing proposals have been updated, including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefits*”.
- 2.7.33 There is therefore express direction of greater weight attaching to the benefits of the development in terms of how it contributes to tackling the climate emergency. The removal of the Spatial Framework for onshore wind farms, as previously required by Scottish Planning Policy (SPP), also gives rise to fewer locational constraints.
- 2.7.34 Paragraph 3.6.5 makes reference to Landscape Sensitivity Studies and makes it clear that these should not be used in isolation to determine matters of acceptability but can be a useful tool in assessing specific sensitivities within an area. It should be noted that the term is now landscape sensitivity, in comparison with SPP paragraph 162 which encouraged Landscape Capacity Studies. This reflects NatureScot’s 2022¹⁷ guidance.
- 2.7.35 Paragraph 3.6.3 also makes reference to the NPF4 Policy 11 criteria with regard to energy development stating that “*where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable*”.
- 2.7.36 Section 3.7 relates to noise and makes reference to the ‘The Assessment and Rating of Noise from Wind Farms’ (Final Report, Sept 1996, DTI), (ETSU-R-97) which provides the framework for the measurement of wind turbine noise. All applicants are required to follow the framework and use it to assess and rate noise from wind energy developments.

Energy Systems & Regulation

- 2.7.37 Chapter 8 of the OWPS deals with ‘Onshore Wind, Energy Systems and Regulation’. Section 8.2 refers to network planning and delivery and states:

“*Delivering our ambition of 20GW of onshore wind by 2030 will create demands on our electricity infrastructure. New developments will need to connect quickly to Scotland’s distribution and transmission networks. Networks must be able to invest quickly and ahead of need in order to ensure swift and efficient connections for onshore wind developments*”.
- 2.7.38 The Proposed Development is expected to contribute to the 2030 target. It should also be noted that NPF4 Policy 11 advises that grid capacity should not constrain renewable energy development, therefore any challenges facing developers in getting connected, including delays, are not matters for the planning decision makers to be concerned with.

¹⁷ NatureScot, Landscape Sensitivity Assessment Guidance, paragraph 8 (2022).

OWPS Conclusions

- 2.7.39 Page 49 of the OWPS sets out overall conclusions and these include *inter alia* the following key points:
- > Deployment of onshore wind is “*mission critical for meeting our climate targets*”.
 - > As an affordable and reliable source of electricity generation, “*we must continue to maximise our natural resource and deliver net zero in a way that is fully aligned with, and continues to protect our natural heritage and native flora and fauna*”.
 - > A renewed commitment to this technology will ensure we keep “*leading the way in onshore wind deployment and support within the UK*”.
 - > The Scottish Government has established “*a clear expectation of delivery with our ambition for a **minimum installed capacity of 20GW** of onshore wind in Scotland by 2030 and providing a vehicle for that delivery through the creation of [the] Onshore Wind Strategic Leadership Group*” (emphasis added).
- 2.7.40 It is stated that “*Onshore wind will remain an essential part of our energy mix and climate change mitigation efforts, but we are also in a nature crisis. Onshore wind farms must strike the right balance in how we care for and use our land...*”.
- 2.7.41 The term “mission critical” is strong language and indicates onshore wind is crucial and extremely important to the attainment of the Government’s policy and legislative objectives. This is fundamentally different policy language to that contained within National Planning Framework 3 (NPF3) and SPP.
- ## 2.8 The Onshore Wind Sector Deal
- 2.8.1 The Onshore Wind Sector Deal (the ‘Sector Deal’) for Scotland was finalised in September 2023. It sets out a series of key measures which will support the Scottish Government in reaching its target of a minimum of 20 GW of onshore wind by 2030. It describes how the Scottish Government and the onshore wind sector will work together to deliver onshore wind farms quickly, sustainably and to the benefit of local communities and with the overall objective of attaining Scotland’s net zero target.
- 2.8.2 The Foreword sets out that:
- “The Government is committed to working with developers and stakeholders, understanding the operational barriers to delivering onshore wind projects and setting out processes to help reduce them. We also commit to speeding up consenting decisions, working with planning authorities and statutory consultees to increase skills and resources, as well as streamlining approaches.*
- Jointly, we will work together on ensuring a balance is struck between onshore wind and the impacts on land use and the environment. We will collaborate to enable information to be collected and shared from monitoring and evidence purposes, and we jointly want to capitalise on the unique opportunity for Scotland to become a world leader in decommissioning, re-manufacturing and recycling of onshore wind assets.”*
- 2.8.3 It further adds that:
- “The Sector Deal is more than just a document; it is a testament to our determination, a celebration of our potential, and a promise to future generations. Let us work together to usher in an era where innovation, sustainability, and prosperity converge, as we power Scotland’s greener future through the boundless energy of onshore wind.”*
- 2.8.4 The matters within the Sector Deal to be actioned by a collaborative approach and also by specific actions from the sector and Government relate to:
- > Supply chain, skills and the circular economy;

- > Community and benefits;
- > Land use and the environment;
- > Planning;
- > Legislative and regulatory actions; and
- > Technical actions.

2.8.5 In terms of land use and the environment, the Sector Deal sets out that NPF4 Policy 1 makes it clear that significant weight needs to be given to the global climate and nature crisis and that *“New onshore wind projects in Scotland will enhance biodiversity and optimise land use and environmental benefits”* (page 11).

2.8.6 It further adds that:

“Balancing the need for more wind farms with the safeguards defined in NPF4 will be a crucial aspect of achieving the 2030 onshore wind ambition. Scotland will continue to be a world leader in responsible onshore wind development, demonstrating how onshore wind can co-exist with a diversity of species, sensitive habitats, peatland, carbon rich soils and forestry, ensuring positive outcomes for the climate and nature.”

2.8.7 In terms of planning, a key matter is that there is an ambition to reduce the time it takes to determine Section 36 consent applications. The Sector Deal also states (page 13) in relation to planning that:

“The ambition of 20 GW of installed onshore wind capacity by 2030 will require a significant number of new sites, the repowering and extension of existing sites and the realisation of unbuilt consented sites. Meeting this ambition will require the determination of applications to be made much more quickly than in recent years.”

2.9 The Draft Energy Strategy and Just Transition Plan

2.9.1 The Scottish Government published a new draft ‘Energy Strategy and Just Transition Plan’ entitled ‘Delivering a fair and secure zero carbon energy system for Scotland’ on 10 January 2023. The new Strategy is to replace the one previously published in 2017. The consultation period ended in April 2023. As a draft document it can only be afforded limited weight. The draft document is however consistent with the adopted policy set out in NPF4 and the identification of the 2020s as a crucial decade for the large-scale delivery of renewable energy projects supporting urgent transition to net zero.

2.9.2 The Ministerial Foreword states:

“The imperative is clear: in this decisive decade, we must deliver an energy system that meets the challenge of becoming a net zero nation by 2045, supplies safe and secure energy for all, generate economic opportunities, and builds a just transition...”

The delivery of this draft Energy Strategy and Just Transition Plan will reduce energy costs in the long term and reduce the likelihood of future energy cost crises....

It is also clear that as part of our response to the climate crisis we must reduce our dependence on oil and gas and that Scotland is well positioned to do so in a way that ensures we have sufficient, secure and affordable energy to meet our needs, to support economic growth and to capture sustainable export opportunities....

For all these reasons, this draft Strategy and Plan supports the fastest possible just transition for the oil and gas sector in order to secure a bright future for a revitalised North Sea energy sector focused on renewables.”

2.9.3 The Foreword adds that the draft Strategy sets out key ambitions for Scotland’s energy future including:

- > More than 20 GW of additional renewable electricity on and offshore by 2030.
- > Accelerated decarbonisation of domestic industry, transport and heat.
- > Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe.
- > Energy security through development of our own resources and additional energy storage.
- > A just transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production.

2.9.4 The draft Strategy states (page 7, Executive Summary) that the vision for Scotland's energy system is:

"...that by 2045 Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business. This will deliver maximum benefit for Scotland, enabling us to achieve a wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions.

In order to deliver that vision, this Strategy sets out clear policy positions and a route map of actions with a focus out to 2030".

2.9.5 A fundamental part of the draft Strategy is expanding the energy generation sector. The Executive Summary states (page 8) that Scotland's renewable resources mean that:

"...we can not only generate enough cheap green electricity to power Scotland's economy, but also export electricity to our neighbours, supporting jobs here in Scotland and the decarbonisation ambitions of our partners.

We are setting an ambition of more than 20 GW of additional low-cost renewable electricity generation capacity by 2030, including 12 GW of onshore wind....

An additional 20 GW of renewable generation will more than double our existing renewable generation capacity by 2030....."

2.10 Green Industrial Strategy

2.10.1 The Scottish Government published a Green Industrial Strategy (GIS) in September 2024. The Executive Summary sets out the mission of the GIS, namely:

"This Green Industrial Strategy's mission is to ensure that Scotland realises the maximum possible economic benefit from the opportunities created by the global transition to net zero".

2.10.2 The GIS sets out five opportunity areas for Scotland where identified strengths are most likely to lead to growth and the potential to grow Scotland's exports. The sectors relate to Scotland's wind economy, carbon capture and storage, supporting the green economy by way of professional and financial services, growing the hydrogen sector and establishing Scotland as a competitive centre for clean energy intensive industries of the future.

2.10.3 Page 6 sets out that the GIS forms a key part of the Government's broader National Strategy for Economic Transformation. It states that *"It also links explicitly to our Just Transition Plans which describe how the transition to net zero in the most emitting sectors will be achieved in a way that delivers economic, social and community benefits, including fair work, environmental preservation and reduced poverty and inequality."*

2.10.4 The first of the five opportunity areas is in relation to 'maximising Scotland's wind economy'. It states (page 7) that this:

"is about making the most of our natural resources, established onshore and offshore wind sectors and first-mover advantage in floating offshore wind to generate clean electricity; participating in global supply chains as well as expanding our domestic supply chain capacity and seizing opportunities across the offshore wind supply chain, from infrastructure to

manufacturing; positioning Scotland as a leader in material circularity of wind turbines and components."

2.10.5 Actions include, *inter alia*:

- > Supporting investment to improve essential infrastructure, expanding supply chains and secure manufacturing opportunities;
- > Developing and maintaining a pipeline of investment propositions backed by clear information about the timing and nature of renewable energy opportunities;
- > Delivering planning and consenting systems which enable Scotland's net zero development pipeline; and
- > Exploring the circularity opportunity in onshore wind.

2.10.6 Page 13 states clearly that the single goal of the GIS is to help Scotland realise economic growth opportunities from the global transition to net zero.

2.10.7 Onshore wind is referred to in some detail at page 21 where the GIS states:

"Onshore wind is the biggest single technology in Scotland's current mix of renewable electricity generation, comprising 62% of installed capacity.

A thriving onshore wind sector is therefore critical to the decarbonisation in Scotland and the UK. As set out in our 2022 Onshore Wind Policy Statement, Government and industry are focused on delivering at least 20 GW of onshore wind by 2030 (doubling current capacity) and recent pipeline analysis shows that we should be on track to deliver this.

This trajectory is underpinned by the Onshore Wind Sector Deal which sets out a set of specific collaborative actions which include commitments by both the Scottish Government and the onshore wind industry to help deliver the 20 GW ambition.

A supportive policy environment and successful industry collaboration via the Onshore Wind Strategic Leadership Group confirms the shared commitment of Government and industry to achieve this successful and responsible growth.

The onshore wind workforce is highly skilled and opportunities in installation, consulting, operations and maintenance are anticipated to rise in response to growth ambitions. Specialised engineering consultancy services such as wind farm design and financial due diligence related to onshore developments are expected to grow and offer additional export potential. There is commercial opportunity in circular supply chains related to the UK wind industry. Scotland's established, and now ageing onshore wind assets may also offer opportunities for innovative solutions in remanufacturing, recycling, and decommissioning end of life assets."

2.10.8 It is clear therefore that to progress the Government's objectives with regard to wind energy there needs to be clear support for new investment and growth in onshore wind development. Realising the economic and social opportunities will only be achieved through the development and consenting of additional wind energy developments. Such deployment will not only be critical towards achieving the net zero target, given the important contribution that wind energy will make in that regard, but will also help deliver the Government's clear green infrastructure mission.

2.11 Scotland's Climate Change Plan

2.11.1 The Scottish Government published 'Scotland's Climate Change Plan – 2026-2040' ('CCP') on 25 March 2026. The CCP covers the period 2026 to 2040 and aligns with three five-year "carbon budget" periods: 2026-30, 2031-35 and 2036-40. The CCP sets out the policies and proposals the Scottish Government will take forward to enable the carbon budgets set out in legislation to be met. The carbon budgets have been set in line with the levels proposed by the CCC in May 2025 and provide a clear pathway towards Scotland achieving net zero by 2045 as follows:

- > 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).
- > 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).
- > 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).
- > 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).

- 2.11.2 The CCP confirms that Scotland remains committed to achieving net zero GHG emissions by 2045 at the latest and that as of 2023, Scotland had reduced emissions by 51.3% since 1990 — the largest reduction in the UK.
- 2.11.3 The CCP notes that the key driver of the transition to date has been the transformation in the way energy is generated - from coal and gas to a thriving renewables sector. In 2023, 70% of electricity generated in Scotland was from renewable sources.
- 2.11.4 It acknowledges the opportunity the transition to net zero provides in terms of growing the economy, noting that the net zero transition can support significant economic opportunities for Scotland.
- 2.11.5 The CCP sets out average reductions in GHG emissions (compared to 1990 baseline) for each five-year period, and these have been referenced above in the context of recent CCC Reports and the 2025 Regulations which formalise these carbon budgets.
- 2.11.6 These budgets provide a “pathway” toward net zero by 2045, and the CCP is designed to ensure policies are in place to meet them.
- 2.11.7 Annex 2 of the CCP contains the Sectoral Annexes which support the CCP. Energy supply is one of the key areas of focus. At page 84, the document sets out the vision for Scotland stating that:
- “By 2035, we will have expanded our renewable capacity significantly to meet the increasing demand as other sectors decarbonise. We already have an ambition to have delivered 20GW of onshore wind by 2030 and in January 2026, we published the ‘Offshore Wind Policy Statement 2020 update: Scotland’s Offshore Wind Ambition’. This set out an increased offshore wind ambition for Scotland of up to 40GW of new offshore wind capacity by 2040.”*
- 2.11.8 It continues that as we transition to net zero and reduce reliance on fossil fuel generation *“energy storage will play a larger role in ensuring a secure and resilient electricity system by providing a reliable and flexible electricity supply.”* (page 84, Annex 2)
- 2.11.9 One of the actions identified to achieve the vision of emissions reduction for the energy generation sector means *“moving to an electricity system in which the residual amount of unabated gas is displaced by low carbon and renewable sources. To deliver this target, whilst ensuring a safe and secure supply, **we must grow our renewables capacity**, including from offshore and **onshore wind**, and solar.”* (page 89, Annex 2) (emphasis added).
- 2.11.10 The publication of the CCP demonstrates the continued commitment and needs case for delivering additional renewable energy capacity. One can take from that that the associated need for reinforced / new transmission infrastructure to achieve net zero is in turn strengthened.

2.12 Conclusions on the Renewable Energy Policy & Legislative Framework

- 2.12.1 It is considered that the Proposed Development is very strongly supported by the climate change and renewable energy policy and legislative framework. In particular, given the position as set out within the Clean Power Action Plan and Onshore Wind Taskforce Strategy, in relation to support for further deployment of onshore wind.
- 2.12.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper, and it is essential that rapid progress is made otherwise the legally binding target in Scotland of net zero by 2045 will not be met.

- 2.12.3 It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport. This expected substantial increase in electricity demand is also highlighted in the OWPS.
- 2.12.4 The change from annual Scottish emission reduction targets to a system of carbon budgets has served to show that Scotland is not on track to attain net zero by 2045, and it strengthens the case for rapidly approving schemes that can contribute to this goal. The overall target of net zero remains unchanged in the move to carbon budgets.
- 2.12.5 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives, articulated above, in the planning balance in a given case.
- 2.12.6 In terms of the energy policy considerations, it is helpful to reference the recent position of the Scottish Ministers with regard to a Section 36 wind farm decision. Section 36 consent was granted by the Scottish Ministers on 09 May 2025 for the Chrathaich Wind Farm¹⁸. From paragraph 90 *et seq* of the Decision Letter, the Scottish Ministers in commenting on the acceptability of the development stated:
- “As set out above, the seriousness of climate change, its potential effects and the need to cut carbon dioxide emissions, remain a priority for the Scottish Ministers. Scotland’s renewable energy targets and climate change ambitions, energy policies and planning policies are all relevant considerations when weighing up this proposed development. NPF4, Scotland’s Energy Strategy and the Onshore Wind Policy Statement (“OWPS”) make it clear that renewable energy deployment remains a priority of the Scottish Government. These are all matters which should be afforded significant weight in favour of the proposed development”.*
- The transition to a low carbon economy is an opportunity for Scotland to take advantage of our natural resources to grow low carbon industries and create jobs.*
- The Scottish Ministers are satisfied that the deployment of this amount of renewable energy the proposed development could generate is entirely consistent with the Scottish Government’s policy on the promotion of renewable energy and its target date for net zero emissions of all greenhouse gases by 2045.”*
- 2.12.7 In the recent Bankend Rig III Section 36 decision¹⁹ (November 2025), the Scottish Ministers set out their position with regard to the OWPS. At paragraph 104 they state:
- “The OWPS reaffirms the vital role for onshore wind in meeting Scotland’s energy targets within the context of the Scottish Government’s 2045 net zero emissions commitment. The OWPS sets out the Scottish Government’s position for the ongoing need for more onshore wind development and capacity in locations across Scotland where it can be accommodated in appropriate locations. OWPS also seeks to maximise the benefits from onshore wind to ensure that Scotland’s citizens have access to affordable, low carbon and renewable energy whilst tackling the climate and nature crises in tandem.*
- The Scottish Ministers are satisfied that the proposed development will provide a contribution to renewable energy targets and carbon savings in support of the ambitions of the SES and OWPS.”*
- 2.12.8 In the most recent renewable energy policy documents referred to, there is a consistent and what might be termed a ‘green thread’, which ties a number of related policy matters together: namely the urgent challenge and imperative of attaining and sustaining net zero and the need to substantially increase renewable capacity, notably onshore wind.

¹⁸ Scottish Ministers (2025) Chrathaich Wind Farm Decisions Letter ECU Reference ECU00004704

¹⁹ Scottish Ministers (2025) Bankend Rig III Wind Farm Decision Letter ECU Reference ECU00004516

- 2.12.9 The OWPS, draft Energy Strategy and the CCP form part of the strengthened policy approach alongside NPF4. These documents confirm the Scottish Government's policy objectives and related targets, reaffirming the important role that onshore wind will play in response to the climate crisis which is at the heart of all these policies.
- 2.12.10 It must follow that the needs case for the Proposed Development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance, and the contribution of the Proposed Development to meeting net zero and low carbon energy targets. It is the cumulative effect of a large number of individual projects which will move Scotland towards where it needs to be in order to attain net zero.

3. The Benefits of the Proposed Development

3.1 Introduction

3.1.1 This chapter summarises the benefits that would arise from the Proposed Development.

Renewable Energy Generation

- > With an estimated installed capacity of approximately 58 MW of onshore wind energy and 25 MW of BESS, the Proposed Development would make a valuable and important contribution to the attainment of the UK and Scottish Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Scottish Government renewable energy and net zero targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the climate emergency.
- > The UK legally binding target of net zero GHG emissions by 2050 and the Scottish Government target of net zero by the earlier date of 2045 are major challenges, as explained in the previous chapter. The Scottish Government has made it clear that onshore wind plays a vital and indeed “*mission critical*” role in the attainment of future targets in relation to helping to combat the crisis of global heating.
- > The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Development’s delivery of renewable energy capacity in the near term would have a disproportionately higher benefit than the same capacity delivered later.

Emissions Savings

- > The CO₂ emission savings for the operational lifetime (40 years) would provide a net benefit with regards to reducing the impacts of climate change.
- > The carbon balance calculations establish that the Proposed Development could result in the saving of approximately 48,394 tonnes CO₂ (tCO₂) when compared against grid mix electricity generation (where electricity generation is made up of a mix of fossil fuels and renewable energy sources). This would save 1,935,760 tCO₂ over the operational lifetime of the Proposed Development²⁰.
- > The maximum carbon payback period for the Proposed Development is calculated as 3 years, when compared against grid-mix electricity generation.

Security of Supply

- > The British Energy Security Strategy has been referenced. It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.
- > With this context, the attractiveness of onshore wind, as a proven technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.

²⁰ As set out in **Technical Appendix 2.3: Carbon Balance Assessment (EIAR Volume 4)**.

- > The Proposed Development, if consented, would provide a valuable contribution to security of supply for the wider region, Scotland and for the wider Great Britain (GB) area. Consenting the development, would contribute to an adequate and dependable Scottish and GB generation mix, through enabling the generation of more low carbon power from renewable resources, and would enable the Proposed Development to make a significant contribution to Scottish and wider UK energy security and decarbonisation needs.

Contribution to Decarbonisation and Life Extension of Sullom Voe

- > As set out in the Socio-Economic Statement, the Proposed Development can play a key and pioneering role as a catalyst for Shetland's energy transition and demonstrates its alignment with national and local policy frameworks. The Socio-Economic Statement examines the Proposed Development's catalytic role in enabling wider clean energy development, including hydrogen, storage, and carbon capture.
- > The development of the Proposed Development provides the opportunity to accelerate EnQuest and Veri Energy's decarbonisation plans at SVT, which currently employs around 500 people. Neshion Ltd has signed a Memorandum of Understanding ('MoU') with Veri Energy to explore direct energy supply arrangements, bringing forward the timeline for electrification and enabling hydrogen and e-fuel production at scale. This partnership underscores the Proposed Development's catalytic role in ensuring that Sullom Voe's transition is not delayed by energy supply constraints.
- > The Applicant, in partnership with Veri Energy, is committed to supplying electricity generated by the Proposed Development turbines to provide the initial feedstock for e-fuel production at the SVT. This collaboration is intended to eliminate wind power curtailment, reduce costs to consumers and taxpayers, and provide greater certainty for project financing. It also supports Scotland's wider hydrogen and e-fuels ambitions, positioning SVT as a demonstrator site for the conversion of wind power into low-carbon liquid fuels. Beyond the direct benefits of reducing constrained generation, the partnership enables a more integrated energy system by linking renewable electricity supply with downstream industrial decarbonisation at SVT.
- > Supporting decarbonisation and the shift to e-fuels at SVT would substantially reduce Shetland's emissions. At gigawatt scale, Veri Energy has verbally stated that it could represent an annual reduction of nearly 0.95 million tonnes—equivalent to removing 200,000 cars from the roads. In addition, the just transition at SVT reduces potential job losses among skilled engineers as oil and gas is phased out. Independent research carried out by the University of Strathclyde's Centre for Energy Policy found that early shift to low-carbon fuel production at the SVT could provide the backbone for a successful transition of the Shetland economy. Economic modelling demonstrates that this transition would save up to 350 jobs across Shetland in the 2030s and would limit long-term job losses to a maximum of 55. These employment figures relate to both direct employment within SVT and jobs in the wider supply chain.
- > The Proposed Development is therefore not a standard wind energy project but is a strategically significant infrastructure investment that can widen the benefits significantly beyond onshore wind generation (in line with the Green Industrial Strategy) and would accelerate Scotland's net zero transition while embedding lasting socio-economic value locally.
- > As set out in Chapter 4 below, the Proposed Development would help deliver NPF4 **National Developments 1 and 2**, namely "Energy Innovation Development on the Islands" "Strategic Renewable Electricity Generation and Transmission Infrastructure".

Socio-Economic Benefits

- > As set out in the Socio-Economic Statement, the Proposed Development would result in a range of socio-economic benefits including:
 - During construction, the project is forecast to generate or sustain approximately 396 job-years of employment and £81 million in Gross Value Added (GVA).
 - Over its 40-year operational period, the Proposed Development could deliver £310 million (undiscounted) in GVA — comprising £35 million from direct employment and £275 million from indirect economic effects.
 - These impacts are particularly beneficial in the context of a region facing demographic strain, youth outmigration, and economic reliance on aquaculture and public services.
 - The construction phase would offer near-term employment and procurement opportunities, while the operational phase would sustain an estimated 12 skilled roles and £2.55 million in annual local expenditure, with up to 90% of OPEX retained on-island.

Community Benefits

3.1.2

There are various proposed community benefits including:

- > The communities closest to the Proposed Development—Brough, Firth, Graven, Mossbank, and Toft—face significant challenges. These areas were historically economically sustained by the SVT and Shetland Gas Plant, yet many residents feel excluded from wider benefits across Shetland. Fuel poverty is widespread on Shetland, with energy bills disproportionately high compared to other regions, compounded by poor housing stock and harsh weather conditions.
- > Additional commitments include introducing a **Local Electricity Discount Scheme (LEDS)** to provide financial relief for eligible households. This was the preferred option for a community benefit package from local feedback in person and from online surveys. Linked to this, the Applicant is also exploring participatory budgeting to empower residents in local decision-making. These initiatives are designed to ensure meaningful benefits for those most impacted by the project.
- > The Applicant has actively engaged with the community with regards to **community ownership**. Initially, the concept was introduced and discussed with community members, and feedback was gathered to understand local priorities. As engagement continued, the developer refined its offer, ultimately proposing that at least 5% of the project be made available for community ownership alongside an ambition to gift a share of the project to improve the viability of a community stake. Feedback indicated that community ownership remained a low priority for respondents, with some noting challenges such as the absence of an established community development body. However, the Applicant continues to engage with the local communities and would offer the possibility of a community stake in the project up to the point of final investment decision.

Biodiversity Enhancement

- > An Outline Biodiversity Enhancement and Habitat Management Plan (OBEHMP) has been included as **Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4)** detailing biodiversity enhancement measures. The measures proposed are as follows:
 - > Objective 1: Peatland restoration within the Land Under Applicant's Control;
 - > Objective 2: Reduce grazing pressure;

- > Objective 3: Creating and strengthening nature networks both within and outside the Land Under Applicant's Control;
- > Objective 4: Creation of artificial otter holts within the Land Under Applicant's Control;
- > Objective 5: Removal of waste along the coastline;
- > Objective 6: Creation of wader scrapes; and
- > Objective 7: Offsite Biodiversity Enhancement and Habitat Management.

4. Appraisal against NPF4

4.1 Introduction

4.1.1 NPF4 was approved by resolution of the Scottish Parliament on 11 January 2023 and adopted on 13 February 2023.

4.1.2 A Chief Planner's Letter was issued on 8 February 2023 entitled 'Transitional Arrangements for National Planning Framework 4'. It contained advice intended to support consistency in decision making ahead of new style Local Development Plans being in place.

Development Management

4.1.3 Section 13 of the Planning (Scotland) Act 2019 Act amends Section 24 of the 1997 Act regarding the meaning of the statutory 'Development Plan', such that for the purposes of the 1997 Act, the Development Plan for an area is taken as consisting of the provisions of:

- > The National Planning Framework; and
- > Any Local Development Plan ('LDP').

4.1.4 Therefore, at the time of writing this Planning Statement, the statutory Development Plan applying to the Site consists of NPF4 and the Shetland LDP (2014).

4.1.5 The publication of NPF4 coincided with the coming into force of certain parts of the 2019 Act. A key provision is Section 13 of the 2019 Act which amends Section 24 of the 1997 Act to provide that:

"In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail."

4.1.6 In this case, as noted the LDP was adopted in 2014. It contains some policies which are incompatible with national policy in NPF4, and this will further reduce the weight to be afforded to this element of the Development Plan.

4.1.7 The Chief Planner's Letter also states with regard to Supplementary Guidance associated with LDPs which were in force before 12 February 2023 (the date on which Section 13 of the 2019 Act came into force) that they will continue to be in force and be part of the Development Plan.

How NPF4 is to be used

4.1.8 Annex A (page 94) of NPF4 explains how it is to be used. It states:

"The purpose of planning is to manage the development and use of land in the long-term public interest ... Scotland in 2045 will be different. We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places."

4.1.9 Annex A states that NPF4 is required by law to set out the Scottish Ministers' policies and proposals for the development and use of land. It adds:

"It plays a key role in supporting the delivery of Scotland's national outcomes and the United Nations Sustainable Development Goals²¹. NPF4 includes a long-term spatial strategy to 2045."

²¹ The 17 UN Sustainable Development Goals are set out at page 95 of NPF4 and include *inter alia* 'affordable and clean energy' and 'climate action'.

- 4.1.10 NPF4 contains a Spatial Strategy and Scottish Government development management policies to be applied in all consenting decisions, and it identifies national developments which are aligned to the strategic themes of the Government's Infrastructure Investment Plan²² (IIP).
- 4.1.11 Annex A adds that NPF4 is required by law to contribute to six outcomes. These relate to meeting housing needs, health and wellbeing, population of rural areas, addressing equality and discrimination and also, of particular relevance to the Proposed Development, *"meeting any targets relating to the reduction of emissions of greenhouses gases, and, securing positive effects for biodiversity"*.

4.2 The National Spatial Strategy – Delivery of Sustainable Places

- 4.2.1 Part 1 of NPF4 sets out the Spatial Strategy for Scotland to 2045 based on six spatial principles which are to influence all plans and decisions. The introductory text to the Spatial Strategy starts by stating (page 3):

"The world is facing unprecedented challenges. The global climate emergency means that we need to reduce greenhouse gas emissions and adapt to the future impacts of climate change."

- 4.2.2 The principles are stated as playing a key role in delivering the United Nation's Sustainable Development Goals and the Scottish Government's National Performance Framework²³.

- 4.2.3 The Spatial Strategy is aimed at supporting the delivery of:

- > 'Sustainable Places': *"where we reduce emissions, restore and better connect biodiversity"*;
- > 'Liveable Places': *"where we can all live better, healthier lives"*; and
- > 'Productive places': *"where we have a greener, fairer and more inclusive wellbeing economy"*.

- 4.2.4 Page 6 of NPF4 addresses the delivery of sustainable places. Reference is made to the consequences of Scotland's changing climate, and it states, *inter alia*:

"Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving net zero emissions by 2045, and we must make significant progress towards this by 2030...Scotland's Energy Strategy will set a new agenda for the energy sector in anticipation of continuing innovation and investment."

- 4.2.5 The National Spatial Strategy in relation to 'sustainable places' is described (page 7 of NPF4) as follows:

"Scotland's future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment."

Meeting our climate ambition will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place."

Every decision on our future development must contribute to making Scotland a more sustainable place. We will encourage low and zero carbon design and energy efficiency, development that is accessible by sustainable travel, and expansion of renewable energy generation."

²² The Scottish Government's five-year Infrastructure Investment Plan (2021-22 to 2025-26) was published in February 2021. It set out a vision for Scotland's future infrastructure in order to support and enable an inclusive net zero emissions economy.

²³ The Scottish Government National Performance Framework sets out 'National Outcomes' and measures progress against a range of economic, social and environmental 'National Indicators'.

- 4.2.6 Six National Developments (ND) support the delivery of sustainable places, one being 'Strategic Renewable Electricity Generation and Transmission Infrastructure'.
- 4.2.7 A summary description of this ND is provided at page 7 of NPF4 as follows:
"Supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply".
- 4.2.8 Page 8 of NPF4 sets out 'Cross-cutting Outcome and Policy Links' with regard to reducing greenhouse gas emissions. It states:
"The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment."
- 4.2.9 A key point in this statement is that the climate emergency and nature crisis are expressly stated as forming the foundations of the National Spatial Strategy; recognising that tackling climate change and the nature crisis is an overriding imperative which is key to the outcomes of almost all policies within NPF4.

4.3 Regional Spatial Priorities & National Developments

Overview

- 4.3.1 Page 97 of NPF4 sets out that 18 NDs have been identified. These are described as:
"significant developments of national importance that will help to deliver the spatial strategy ... National development status does not grant planning permission for the development and all relevant consents are required".
- 4.3.2 It adds that:
"Their designation means that the principle for development does not need to be agreed in later consenting processes, providing more certainty for communities, businesses and investors. ... In addition to the statement of need at Annex B, decision makers for applications for consent for national developments should take into account all relevant policies".
- 4.3.3 Annex B of NPF4 sets out the various NDs and related Statements of Need. It explains that NDs are significant developments of national importance that will help to deliver the Spatial Strategy. It states (page 99) that:
"The statements of need set out in this annex are a requirement of the Town and Country Planning (Scotland) Act 1997 and describe the development to be considered as a national development for consent handling purposes".

Regional Spatial Priorities

- 4.3.4 Annex C of NPF4 sets out spatial planning priorities for different regions of Scotland. Shetland falls within the North and West Coast and Islands and a key objective for this region is to *"deliver sustainable places, regional spatial strategies and Local Development Plans should maximise the benefits of renewable energy whilst enhancing blue and green infrastructure, decarbonising transport and building resilient connections".*
- 4.3.5 Priorities include resilience and growing a green economy and it is set out that *"this will be complemented by the innovation in low and zero carbon fuels and the rollout of locally distributed energy systems"* to reduce emissions and to address significant fuel poverty.
- 4.3.6 It adds that *"to significantly reduce greenhouse gas emissions, more onshore and offshore renewable energy generation will be needed, bringing unprecedented opportunities to strengthen local economies, build community wealth and secure long term sustainability...."*

We expect to see continued innovation to unlock the infrastructure and business opportunities arising from a blue and green prosperity agenda."

National Development 1 "Energy Innovation Development on the Islands"

4.3.7 NPF4 describes National Development 1 ('ND1') as follows:

"This national development supports proposed developments in the Outer Hebrides, Shetland and Orkney Island groups for renewable energy generation, renewable hydrogen production, infrastructure and shipping, and associated opportunities in the supply chain for fabrication, research and development.

Any strategy for deployment of these technologies must enable decarbonisation at pace and cannot be used to justify unsustainable levels of fossil fuel extraction or impede Scotland's just transition to net zero.

The use of low and zero emission fuels will play a crucial role in decarbonising island and mainland energy use, shipping, strengthening energy security overall and creating a low carbon energy economy for the islands and islanders. The developments will add value where they link into national and international energy expertise, learning and research and development networks."

4.3.8 The specific Statement of Need adds that: *"these classes of development support the potential of the three island authorities to exemplify a transition to a net zero society. This will support delivery of our spatial strategy by helping to sustain communities in rural and island areas by stimulating employment and innovation."*

4.3.9 For the Shetland Islands it references *"supporting the Opportunity for Renewable Integration with Offshore Networks ('ORION') Clean Energy Project"*.

4.3.10 NPF4 states that a number of classes of development apply to ND1 for the delivery of renewable and low carbon aspects of the ORION project including:

- > **New or updated on and/or offshore infrastructure for energy generation from renewables exceeding 50 megawatts capacity;**
- > Electricity transmission cables and converter stations on and/or offshore of/or exceeding 132kV;
- > **Infrastructure for the production, storage and transportation of low and zero carbon fuels (that are not electricity or heat) including renewable hydrogen; and hydrogen producing and hydrogen production related chemicals.... linked to transport, storage and utilisation infrastructure at Sullom Voe;**
- > Oil terminal modifications at Sullom Voe to maintain asset use moving towards net zero emissions. (emphasis added)

National Development 3 "Strategic Renewable Electricity Generation and Transmission Infrastructure"

4.3.11 NPF4 describes National Development 3 ('ND3') as follows:

"This national development supports renewable electricity generation, repowering, and expansion of the electricity grid.

A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets. Certain types of renewable electricity generation will also be required, which will include energy storage technology and capacity, to provide the vital services, including flexible response, that a zero carbon network will require. Generation is for domestic consumption as well as for export to the UK and beyond, with new capacity helping to decarbonise heat, transport and industrial energy demand. This has the potential to support jobs and business investment, with wider economic benefits.

The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions."

4.3.12 The location for ND3 is set out as being all of Scotland and in terms of need it is described as:

"Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas. ..."

4.3.13 Reference is made to the designation and classes of development which would qualify as ND3, and it states in this regard:

"A development contributing to 'Strategic Renewable Electricity Generation and Transmission' in the location described, within one or more of the Classes of Development described below and that is of a scale or type that would otherwise have been classified as 'major' by 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009', is designated a national development:

(a) on and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity .." (emphasis added)

4.3.14 The Proposed Development, with an installed capacity over 50 MW, would therefore have national development status, and it would make a valuable contribution to the delivery of the National Spatial Strategy.

4.3.15 The National Spatial Strategy requires a *"large and rapid increase"* in electricity generation from renewables and the National Spatial Strategy makes it clear (NPF4, page 6) that *"we must make significant progress"* by 2030.

4.3.16 NPF4 makes it clear that there is a need for wind farms of 'scale'²⁴. This links to the express acknowledgement in NPF4 Policy 11 (see below) that some significant effects are inevitable.

4.4 National Planning Policy

4.4.1 Part 2 of NPF4 (page 36) addresses national planning policy by topic with reference to three themes formulated with the aim of delivering sustainable, liveable and productive places.

4.4.2 In terms of planning, development management and the application of the national level policies, NPF4 states:

"The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies".

4.4.3 In terms of "sustainable places" the most relevant policies to the Proposed Development include the following:

- > Policy 1: Tackling the climate and nature crises;
- > Policy 3: Biodiversity;
- > Policy 4: Natural places;
- > Policy 5: Soils;

²⁴ The NPF4 Statement of Need for National Developments states that additional electricity generation "of scale" is fundamental to achieving a Net Zero economy (NPF4, page 103).

- > Policy 7: Historic assets and places; and
- > Policy 11: Energy.

4.4.4 In terms of “liveable places”, the most relevant policies to the Proposed Development include:

- > Policy 22: Flood risk and water management.

4.4.5 These policies are addressed in turn below.

4.4.6 The Chief Planner’s Letter of 8 February 2023 provides advice in relation to applying NPF4 policy. It states that the application of planning judgement to the circumstances of an individual situation remains essential for all decision making, informed by principles of proportionality and reasonableness. It states:

“It is important to bear in mind NPF4 must be read and applied as a whole. The intent of each of the 33 policies is set out in NPF4 and can be used to guide decision making. Conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement.” (emphasis added)

4.4.7 The Letter adds:

“It is recognised that it may take some time for planning authorities and stakeholders to get to grips with the NPF4 policies, and in particular the interface with individual LDP policies. As outlined above, in the event of any incompatibility between the provision of NPF and the provision of an LDP, whichever of them is the later in date is to prevail. Provisions that are contradictory or in conflict would be likely to be considered incompatible”.

4.5 NPF4 Policy 1: Tackling the Climate and Nature Crises

Policy 1 & Principles

4.5.1 The intent of Policy 1 is “to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis”.

4.5.2 Policy 1 directs decision makers that “when considering all development proposals significant weight will be given to the global climate and nature crises.”

4.5.3 This is a radical departure from the usual approach to policy and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker. Significant weight should therefore be attributed to the Proposed Development given it would be consistent with the intent of Policy 1, would make a positive contribution by helping to attain the outcome of net zero, and would also deliver biodiversity enhancement helping to address the nature crisis.

4.5.4 The Chief Planner’s Letter refers to Policy 1. It states:

“This policy prioritises the climate and nature crises in all decisions. It should be applied together with the other policies in NPF4. It will be for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises.”

4.5.5 This statement from the Chief Planner confirms that the decision maker must apply significant weight to Policy 1, but it is for the decision maker to decide if it is for or against the proposal. The Proposed Development’s contribution to the climate emergency and nature crisis is positive and therefore the significant weight in this case is in favour of the proposal.

4.5.6 The term “Tackling” the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action. Furthermore, NPF4 (page 8) refers to cross cutting outcomes and states with regard to Policy 1 that the policy gives significant weight “to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions”.

The Application of Policy 1

- 4.5.7 Given the nature of the Proposed Development, it would make a valuable contribution in relation to renewable energy generation and greenhouse gas reduction targets. It will directly further the policy intent and outcomes of Policy 1 and should be afforded significant positive weight in terms of tackling the climate and nature crises. The specific emissions and carbon saving benefits are set out below in the context of NPF4 Policy 11 which requires the contribution that a development would make to targets to be taken into account.
- 4.5.8 The point is made later in this chapter that it is important to recognise the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a valuable contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of net zero no later than 2045. The purpose of achieving net zero is also to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.
- 4.5.9 Furthermore, as explained below with reference to NPF4 Policy 3, biodiversity enhancement measures are proposed as part of the Proposed Development.

4.6 NPF4 Policy 11: Energy

Policy 11 & Principles

- 4.6.1 For the consideration of wind energy development, Policy 11 'Energy' (page 53) is the lead policy. Policy 11's intent is set out as:
- "to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low carbon and zero emission technologies including hydrogen and carbon capture utilisation and storage."*
- 4.6.2 Policy Outcomes are identified as: *"expansion of renewable, low carbon and zero emission technologies"*.
- 4.6.3 Policy 11 is in the following terms:
- "a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:*
- i. wind farms including repowering, extending, expanding and extending the life of existing wind farms;*
 - ii. enabling works, such as grid transmission and distribution infrastructure;*
 - iii. energy storage, such as battery storage and pumped storage hydro;*
 - iv. small scale renewable energy generation technology;*
 - v. solar arrays;*
 - vi. proposals associated with negative emissions technologies and carbon capture; and*
 - vii. proposals including co-location of these technologies.*
- b) Development proposals for wind farms in National Parks and National Scenic Areas will not be supported.*
- c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.*

d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;*
- ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;*
- iii. public access, including impact on long distance walking and cycling routes and scenic routes;*
- iv. impacts on aviation and defence interests including seismological recording;*
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;*
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;*
- vii. impacts on historic environment;*
- viii. effects on hydrology, the water environment and flood risk;*
- ix. biodiversity including impacts on birds;*
- x. impacts on trees, woods and forests;*
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;*
- xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and*
- xiii. cumulative impacts.*

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

f) Consents for development proposals may be time-limited. Areas identified for wind farms are, however, expected to be suitable for use in perpetuity”.

The application of Policy 11

- 4.6.4 **Paragraph a) of Policy 11** states a position of express “support” for wind farm development.
- 4.6.5 The intent and desired outcome of the policy is clear – the expansion of renewable energy, through encouragement, promotion and facilitation, all of which the Proposed Development would help to deliver.
- 4.6.6 The wording of Policy 11 Paragraph (a)(i) makes it clear that the policy supports new wind farms and paragraph (vii) provides clear support for proposals including co-location of wind farms and energy storage technology.
- 4.6.7 **Paragraph b) of Policy 11** does not apply in this case as there is no development within a National Park or National Scenic Area.

- 4.6.8 **Paragraph c) of Policy 11** requires developments to “maximise net economic impact”. The socio-economic effects that would arise have been summarised in Chapter 3 above and set out in the Socio-Economic Benefits Statement which accompanies the application. The report concludes that the Proposed Development is capable of delivering long-term, policy-aligned socio-economic benefits, alongside renewable energy and decarbonisation objectives. The combination of quantified economic impacts, provides a robust and proportionate basis for planning consideration and there is considered to be accordance with this aspect of Policy 11.
- 4.6.9 **Paragraph d) of Policy 11** states that development proposals that impact on international and national designations “*will be assessed in relation to Policy 4*”.
- 4.6.10 Policy 4 also deals with impacts in relation to local landscape designations. Therefore, the matter of the impacts of the Proposed Development in relation to such (international, national and local) designations is examined further below with specific regard to the provisions of NPF4 Policy 4.
- 4.6.11 **Paragraph e) of Policy 11** states that project design and mitigation “*will demonstrate how*” impacts are addressed. These are listed in the quotation of the policy above and are addressed in turn below. The Applicant has through project design and mitigation addressed impacts on the matters set out at Policy 11 (e). This has been set out in full within **Chapter 3: Design Evolution and Alternatives (EIAR Volume 2)**, and within relevant topic specific chapters of the EIA Report where relevant. It is considered that appropriate “design mitigation” has been applied.
- (i) Impacts on Communities and Individual Dwellings - Residential Visual Amenity**
- 4.6.12 Settlements and settled areas within the Seascape, Landscape and Visual Impact Assessment (‘SLVIA’) Study Area are typically located along the coastline in the form of long dispersed bands of hamlets, villages and isolated dwellings, farmsteads and crofting properties connected by local roads or main highways. There is often a clustering of dwellings within sheltered bays, extending inland along the adjoining valley bottoms, becoming less dense away from the coast.
- 4.6.13 Mossbank is located 2.85 km east south east of the Proposed Development. The village is situated mainly on the north side of Firths Voe extending around the Burra Ness headland.
- 4.6.14 Properties are typically orientated towards the north east or south, overlooking the coast with open and elevated views from properties further setback from the coastline. These views are long distance, with the Isle of Yell also visible in the background. Views inland from the settlement area, towards the west, are often constrained by localised rising topography.
- 4.6.15 Scatsta, Graven and Garth are to the south and south west of the Proposed Development. Settlement comprises of a loose band of small hamlets and villages along the south eastern coastline of Sullom Voe, with dwellings further inland into low-lying areas and shallow valley bottoms that extend east from Sullom Voe and include single dwellings along the minor road that runs to the east of Graven. Distances to the Proposed Development range from 2.3 km to 5.5 km.
- 4.6.16 Other settlements considered in the SLVIA are fully described in **Chapter 4: Seascape, Landscape and Visual (EIAR Volume 2)**.
- 4.6.17 As set out in **Chapter 4: Seascape, Landscape and Visual (EIAR Volume 2)** (‘SLVIA’) of the EIA Report, a detailed Residential Visual Amenity Assessment (‘RVAA’) was undertaken and is contained in **Technical Appendix 4.7: Residential Visual Amenity Assessment (EIAR Volume 4)**. Individual properties situated within 2 km radius of the turbines of the Proposed Development have been assessed in detail with respect to Residential Visual Amenity Threshold (‘RVAT’).
- 4.6.18 The assessment concludes that none of these receptors would be subject to effects on residential visual amenity which are judged to breach the RVAT.

(i) Noise and Shadow Flicker

- 4.6.19 Noise is addressed in **Chapter 10: Noise (EIAR Volume 2)**. The assessment explains that construction noise activities associated with the Proposed Development were assessed in accordance with guidance and acceptable threshold noise values presented within BS 5228. The results show that the predicted noise levels would be below the most stringent of the noise threshold levels detailed in BS 5228. Nevertheless, good practice noise control measures during construction are recommended to keep noise to a minimum and recommendations in accordance with BS 5228.
- 4.6.20 The operational wind farm noise assessment involved setting the Total ETSU-R-97 Noise Limits ('TNL') (which are limits for noise from all wind farms in the area) relative to background noise levels at the nearest noise sensitive receptors, predicting the likely effects (undertaking a cumulative noise assessment where required) and setting Site Specific Noise Limits which could be conditioned for the operation of the Proposed Development on its own.
- 4.6.21 Predictions of wind turbine noise from the Proposed Development were made in accordance with good practice guidance using a candidate wind turbine, the Vestas V172 7.2 MW, with a hub height of 114 m. Predicted cumulative operational wind farm noise levels indicate that for noise sensitive receptors in the vicinity of the Proposed Development, cumulative wind turbine noise resulting from the nearby proposed Sullom Voe Oil Terminal Wind Turbines (planning application submitted), as well as the Proposed Development, would meet the TNL.
- 4.6.22 The TNL is applicable to all wind turbines in the area, therefore Site Specific Noise Limits were also derived to inform conditioning of the noise levels from the Proposed Development on its own. Predicted operational noise levels from the Proposed Development on its own indicate that it would meet the Site Specific Noise Limits at all noise assessment locations.
- 4.6.23 The use of Site Specific Noise Limits would ensure that the Proposed Development could operate concurrently with the proposed Sullom Voe Oil Terminal Wind Turbines (the only other relevant wind turbine development in the area) and would also ensure that the Proposed Development's individual contribution could be measured and enforced if required.
- 4.6.24 The candidate wind turbine model for the Proposed Development was chosen in order to allow a representative assessment of the noise impacts. Should the Proposed Development receive consent, the final choice of wind turbine would be subject to a competitive tendering process. The final choice of wind turbine would, however, need to be operated in such a way that the Site Specific Noise Limits presented in the noise assessment and contained in any operational noise condition are met.
- 4.6.25 Shadow Flicker is addressed in **Chapter 13: Shadow Flicker (EIAR Volume 2)**. The assessment used standard guidance that shadow flicker should not be allowed to exceed 30 hours per year or 30 minutes per day. As such, properties where shadow flicker would potentially exceed these thresholds would be subject to significant effects, in the absence of mitigation.
- 4.6.26 The assessment indicated that the potential number of shadow flicker hours experienced exceeds 30 hours per year or 30 minutes per day at five of the properties identified within the study area. In the absence of mitigation, shadow flicker effects would be potentially significant for these receptors.
- 4.6.27 It is explained in the assessment that the analysis provides an extremely conservative estimate of the extent that the properties would be affected by shadow flicker. Due to frequent cloud cover, low irradiance intensity, turbines not turning at all times, the presence of intervening vegetation and turbine rotors not being aligned with the sun in a way to cast maximum shadow onto the proposed properties all of the time, the number of hours when shadow flicker would affect the aforementioned properties is anticipated to be far fewer.
- 4.6.28 Mitigation in the form a standard wind farm Shadow Flicker Protocol has been proposed by the Applicant to avoid significant shadow flicker effects. This can be secured by way of a planning condition. With such appropriate mitigation measures in place the impact from shadow flicker is predicted to be non-significant for the Proposed Development.

(ii) Landscape and Visual Considerations

4.6.29 Before examining the landscape and visual effects of the Proposed Development, paragraph e(ii) of NPF4 Policy 11 makes it clear and recognises that significant landscape and visual impacts are to be expected for some forms of renewable energy. This is a very different starting point compared to the position in the former SPP and there is a very clear steer that significant effects are to be expected, and where localised and/or subject to appropriate design mitigation, they should generally be acceptable.

4.6.30 As noted, the SLVIA should be referred to for its detail, but summary points are referenced below. The assessment considers the likely significant effects arising during construction and operation on landscape fabric, landscape character, coastal character, designated and classified landscapes, and visual amenity, including effects on settlements, roads, ferry routes, core paths and representative viewpoints.

Landscape Character

4.6.31 Landscape effects are concerned with how the Proposed Development would affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape, and its distinctive character.

4.6.32 The assessment identifies that effects are concentrated primarily within the local host landscape and those areas with direct views towards the Site, particularly around Yell Sound and nearby settled areas. During construction, effects would generally be localised, temporary and largely reversible. During operation, the most notable effects would arise from the introduction of the proposed turbines as notable new features in views from parts of the surrounding area; however, many effects are moderated by distance, landform screening and the existing influence of development associated with SVT and other established infrastructure.

4.6.33 During operation of the Proposed Development there would be significant effects on landscape character within approximately 5-8 km of the Proposed Development. Where significant effects are predicted this is a result of a small number of key characteristics being affected or in a limited part of the affected unit.

4.6.34 During operation of the Proposed Development there would be significant adverse effects on coastal character areas within approximately 6 km.

4.6.35 It is explained in the assessment that effects on landscape and coastal character in the wider SLVIA study area would be not significant due to intervening distance, the influence of existing development at SVT or limited visibility of the Proposed Development. Effects on landscape and coastal character are considered to be localised.

Designated Landscapes

4.6.36 The Shetland National Scenic Area (NSA) comprises of seven separate Areas which are listed below with respective distance to the nearest proposed turbine.

- > North Roe NSA Area – 11 km to the north north west;
- > Eshaness NSA Area – 12 km to the west;
- > Muckle Roe NSA Area – 12.5 km to the south west;
- > Hermaness – 25 km to the north west;
- > South West Mainland – 27.5 km to the south;
- > Foula – 55 km to the south west; and
- > Fair Isle – 103 km south south west.

- 4.6.37 In consultation with NatureScot it was agreed that the SLVIA assess in detail North Roe, Eshaness, and Muckle Roe. The assessment concludes that there would be significant effects on only one Shetland NSA Special Landscape Quality ('SLQ') and only in the North Roe NSA area. The integrity of the NSA would not be compromised.
- 4.6.38 There are 15 Local Landscape Areas ('LLAs') within the 45 km SLVIA Study Area. The LLAs assessed in detail are listed below with respective distance to the nearest proposed turbine:
- > LLA 1 Ronas Hill – 8.0 km north west;
 - > LLA 2 Nibon and Mangaster – 8.0 km west;
 - > LLA 12 Lunna Ness and Lunning – 7.9 km south east ; and
 - > LLA 17 West Sandwick to Gloop Holm – 9.1 km north.
- 4.6.39 The assessment concludes that there would be no significant effects on any LLA and the integrity of LLAs would not be compromised.
- Visual Effects
- 4.6.40 It is explained in the assessment that during operation there would be significant adverse effects on the following visual receptors:
- > The northern most part of Mossbank;
 - > Settlement in the Scatsta, Graven and Garth area;
 - > Settlement at Ollaberry and North Gluss area;
 - > Settlement at Housetter;
 - > Settlement on Lunna peninsula;
 - > Settlement at Ulsta, Copister and West Yell;
 - > A short section of the A968;
 - > A short section of the B9076;
 - > The B9079 at Ollaberry;
 - > The B9081 at Ulsta;
 - > Toft-Ulsta ferry route;
 - > Core path CPPFe03 in the northeast of Mossbank;
 - > Core path CPPN13 at Ollaberry;
 - > Core path CPPNL04 on Lunna peninsula; and
 - > NCN 1 at Scatsta, Houb of Scatsta and the A968 junction with the B9076.
- 4.6.41 During the operational period significant adverse effects are predicted at the following viewpoints used in the SLVIA:
- > Viewpoint 3: Ollaberry, St Magnus Church;
 - > Viewpoint 4: Yell, Ulsta Ferry Terminal;
 - > Viewpoint 5: Lunna Ness Parking, Outrabister;
 - > Viewpoint 7: Brough;
 - > Viewpoint 8: Toft Ferry Terminal;

- > Viewpoint 9: Vantage Point at Houb of Scatsta;
- > Viewpoint 10: Cairn at Hill of Graven;
- > Viewpoint 11: Minor Road between Southlee and Graven;
- > Viewpoint 12: Hill of Crooksetter;
- > Viewpoint 13: North Gluss;
- > Viewpoint 18: A968, Yell;
- > Viewpoint 20: A968 South of Firths Voe;
- > Viewpoint 21: Mossbank;
- > Viewpoint 22: Ollaberry;
- > Viewpoint 25: Toft; and
- > Viewpoint 26; Toft-Ulsta Ferry.

4.6.42 These viewpoints are all situated within approximately 9 km of the nearest proposed turbine. The significant visual impacts arising are therefore considered to be localised.

Night-time Effects

4.6.43 The assessment states that there would be no significant adverse night-time effects on landscape receptors. There would be significant adverse night-time effects on a small part of Mossbank in the northern most part of the village and at Ulsta on Yell. There would be significant night-time effects from the external areas of four properties at Toft and there would be significant night-time effects on a short section of the A968 at Ulsta.

Cumulative

4.6.44 The assessment of cumulative operational effects focused on in-addition effects arising from consented sites and developments in the planning system. Scoping sites were not considered. While the assessment identified significant cumulative effects, these would be no greater than effects assessed in the solus assessment and would extend across a similar geographical area.

4.6.45 Overall, the SLVIA concludes that the Proposed Development would result in some significant localised seascape, landscape and visual effects, but that these are contained within a limited and localised area and have been reduced where possible through embedded design mitigation.

(iii) Public Access

4.6.46 The Proposed Development would not result in any restrictions to public access and the access tracks would be available for recreational use.

(iv) Aviation and Defence Interests and v) Telecommunications & Broadcasting

4.6.47 The EIA Report addresses impacts to aviation and defence matters in **Chapter 11: Aviation and Radar (EIAR Volume 2)**. This assessment considers the likely significant effects on aviation and radar associated with the construction and operation of the Proposed Development. It finds that the Proposed Development has the potential to affect:

- > the Ministry of Defence ('MoD') Saxa Vord air defence radar;
- > the Brough Hill Vessel Traffic Service ('VTS') radar; and
- > low flying military aircraft.

- 4.6.48 The Applicant proposes to mitigate the effects of the Proposed Development on the Saxa Vord air defence radar by the application of a Non-Auto Initiation Zone ('NAIZ') over the wind farm. This mitigation has been accepted by the MoD and is in operational use at numerous onshore wind farm sites across the UK. The residual effect of the Proposed Development on the Saxa Vord radar, with this mitigation in place, would therefore not be significant.
- 4.6.49 The Applicant proposes to mitigate the effects of the Proposed Development on the Brough Hill VTS radar by the reconfiguration of the Sullom Voe radar network to be applied by the radar operator to accommodate the Veri Energy wind energy development. The residual effect of the Proposed Development on the Brough Hill radar with this mitigation in place would therefore not be significant.
- 4.6.50 The MoD has advised that the effects of the Proposed Development on low flying military aircraft could be acceptably mitigated by the imposition of planning conditions requiring pre-construction notification of the details of the Proposed Development and the provision of aviation lighting. These measures are required by law and would, if required, be additionally secured through planning conditions.
- 4.6.51 The EIA Report addresses impacts on telecommunications infrastructure in **Chapter 12: Telecommunications (EIAR Volume 2)**.
- 4.6.52 The assessment finds that there are three microwave and one scanning telemetry links with the potential to be affected by the Proposed Development. The turbine layout has been designed to ensure that all blade tips would remain at least 100 m clear of all fixed microwave links in the vicinity. The effects of the Proposed Development on fixed microwave telecommunications links are therefore assessed as not significant.
- 4.6.53 Following further engineering analysis by the Joint Radio Company ('JRC'), funded by the Applicant, a mitigation solution for the effects of the Proposed Development on the scanning telemetry link from the Shetland Gas Plant Substation to the Firth Substation has been identified and approved by the link operator, Scottish & Southern Energy ('SSE').
- 4.6.54 Following implementation of agreed mitigation, the Proposed Development would have no significant effects on telecommunications.
- (vi) Impacts on Road Traffic and Trunk Roads**
- 4.6.55 **Chapter 9: Traffic, Transport and Access (EIAR Volume 2)** addresses impacts relating to construction traffic and transport. The assessment explains that to determine appropriate access routes to the Site, detailed consideration and assessment of the surrounding road network was undertaken in the form of a comprehensive desk-based study. This established that the most likely routes for general construction traffic travelling to the Site are:
- > The A970 north from Lerwick to Hillside, Voe;
 - > The A968 north from Hillside, Voe to the B9076 junction at Firth;
 - > The B9076 west from the A968 junction at Firth to the unadopted road to Shetland Gas Plant; and
 - > The unadopted road from the B9076 to the Site entrance.
- 4.6.56 Only traffic impacts during the construction phase have been considered in the assessment. Operational and decommissioning traffic impacts were scoped out.
- 4.6.57 It is expected that the turbine components would be transferred by AIL vehicles to the Site from the Port facilities at Lerwick, however the Port Sullom Voe is being considered as an alternative.
- 4.6.58 Baseline traffic data has been obtained for three locations within the traffic, transport and access Study Area: the A970, the A968 and the B9076. The traffic generated by construction of the Proposed Development (over a 24-month period) would result in a temporary increase in baseline traffic levels.

4.6.59 During the peak month of construction (month 10), it is anticipated that approximately 74 two-way Heavy Goods Vehicle movements, and 60 two-way car/Light Goods Vehicle movements (associated with workforce travel) would occur daily. This calculation assumes a seven-day working week. It is explained in the assessment that the percentage increase in total traffic on all assessed road links is less than 10 %. The likely significant environmental effects associated with this increase in traffic have been assessed and are considered not significant.

4.6.60 A Construction Traffic Management Plan ('CTMP') is proposed, and which would be secured by way of a standard planning condition.

(vii) Historic Environment

4.6.61 **Chapter 5: Cultural Heritage (EIAR Volume 2)** addresses the archaeological and historic environment value of the Site and assesses the potential both for direct and indirect physical impacts and setting impacts on archaeological features and heritage assets resulting from the construction, operation and decommissioning of the Proposed Development.

4.6.62 Effects in relation to the historic environment are further examined below in terms of NPF4 Policy 7 (Historic assets and places). In summary, the final design has gone through an iterative process with embedded mitigation by design intended to reduce the effects generated across the lifetime of the Proposed Development. Additional mitigation has been identified during construction phase.

(viii) Hydrology, the Water Environment and Flood Risk

4.6.63 **Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2)** addresses the potential impacts of the Proposed Development on hydrological interests and peat. An assessment has been undertaken of the potential effects on the water environment during the construction, operation, and decommissioning phases of the Proposed Development.

4.6.64 It is explained in the assessment that receptors of focus within the water environment include watercourses, water supplies including private and public water supplies, lochs and groundwater. Main receptors for geology and soils are primarily focussed on peat and carbon rich soils.

4.6.65 Potential impacts during construction are associated with temporary alterations to surface water flow pathways, increased sedimentation and erosion, potential for effects on carbon rich soils and deep peat, including peat landslide effects, and the risk of accidental pollution arising from earthworks, material storage, and construction activities.

4.6.66 During operation, potential effects are limited to minor changes in surface runoff characteristics and localised erosion associated with hardstanding areas and site drainage infrastructure.

4.6.67 Baseline conditions identified the presence of onsite surface water features including the Aywick Burn, Burn of Toft, and ephemeral streams, and provides context of surrounding controlled waters and proximate receptors including designated sites.

4.6.68 Peat surveys were carried out at the Site including peat depth probing and coring. It is explained that a combined total of 3,242 peat depth probes were taken across the Site with the majority concentrated in areas of the Proposed Development. A total of 12 peat core samples were taken and analysed at selected locations.

4.6.69 The peat depth survey results indicate the Site to be predominately underlain by areas of deep peat (74% of peat depth probes recorded peat depths greater than 1m). For this reason, it has not been possible to avoid areas of deep peat (defined as soil with peat >1m) in the siting of the Proposed Development.

4.6.70 The peatland at the Site was found to be predominantly modified or actively eroding with evidence of drainage, grazing, peat erosion, and peat cuttings. Smaller areas of near natural peatland were identified which have been avoided.

- 4.6.71 The assessment outlines standard (tertiary) mitigation measures to ensure reduced disruption to existing hydrological systems, including a proposed Construction Environmental Management Plan ('CEMP'), Sustainable Drainage Systems ('SuDS'), pollution prevention protocols, which would be developed in a manner consistent with the scope and content of the CEMP.
- 4.6.72 The assessment is further supported by various Technical Appendices assessing the potential for impacts to Groundwater Dependent Terrestrial Ecosystems ('GWDTE') (**Technical Appendix 8.2: Groundwater Dependant Terrestrial Ecosystems Assessment (EIAR Volume 4)**) and a Watercourse Crossing Assessment (**Technical Appendix 8.3: Watercourse Crossing Assessment (EIAR Volume 4)**).
- 4.6.73 The assessment outlines mitigation measures to reduce the potential effects on peat and carbon rich soils, supported by a number of Technical Appendices including **Technical Appendix 8.4: Peat Depth Report (EIAR Volume 4)**, **Technical Appendix 8.5: Outline Peat Management Plan (EIAR Volume 4)** and **Technical Appendix 8.6: Peat Landslide Hazard Risk Assessment (EIAR Volume 4)**.
- 4.6.74 Potential cumulative effects from other operational and consented wind farms and energy infrastructure developments in the surrounding area were also considered. Due to the limited hydrological connectivity between sites and the implementation of consistent good practice and embedded mitigation, no significant cumulative impacts on hydrology or hydrogeology are anticipated.
- 4.6.75 Overall, the EIA concludes that, with the proposed embedded, standard and additional mitigation measures, the Proposed Development would not result in significant adverse effects on hydrology, hydrogeology, geology and peat resources.
- (ix) Biodiversity including impacts on birds**
- 4.6.76 **Chapter 6: Ecology (EIAR Volume 2)** and **Chapter 7: Ornithology (EIAR Volume 2)** address potential effects on ornithological features and ecological features respectively associated with the construction, operation and decommissioning of the Proposed Development.
- Ornithology
- 4.6.77 The assessment is based upon comprehensive baseline data, comprising specifically of targeted ornithological field surveys of important and specially protected ornithological receptors identified during desk study. Targeted baseline ornithological surveys, following best practice guidance, were undertaken within the Site and surrounding Study Area between 2022 and 2024. The desk study and targeted field surveys, identified the following important ornithological receptors potentially affected by the Proposed Development: namely designated sites (and their qualifying species), and 15 wider countryside species: red-throated diver, golden plover, ringed plover, dunlin, lapwing, redshank, whimbrel, curlew, merlin, great black-backed gull, common gull, herring gull, Arctic tern, Arctic skua and great skua.
- 4.6.78 Potential direct and indirect impacts were assessed following best practice guidance and were considered both during construction and during operation. Impacts on potentially sensitive ornithological receptors were avoided and minimised wherever possible in line with NPF4 and best practice guidance and were incorporated into the design process (embedded mitigation).
- 4.6.79 The assessment does not predict any likely significant ornithological residual effects associated with the construction and operation of the Proposed Development.
- 4.6.80 Extensive opportunities for habitat restoration and enhancement described in the OBEHMP (**Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4)**) in the EIA Report are considered likely to benefit blanket bog specialists, specifically breeding red-throated divers and waders.

Ecology

- 4.6.81 The assessment is based upon comprehensive baseline data, comprising specifically of targeted ecological field surveys of important and legally protected ecological receptors identified during desk study and consultation feedback. Targeted baseline ecology surveys, following best practice guidance, were undertaken within the Site and surrounding Study Area between 2022 and 2025.
- 4.6.82 It is explained that there are seven statutory designated sites with ecological features within 10 km of the Site. The closest and most relevant is the Yell Sound Coast SAC and SSSI.
- 4.6.83 The Study Area was characterised by blanket bog and dry modified bog with the most common National Vegetation Classification ('NVC') community mapped across the Study Area being *M17b Trichophorum germanicum – Eriophorum vaginatum* blanket mire community, *Cladonia* spp. sub-community. Less frequently recorded habitats including dry heath, wet heath, acid grassland, coastal grassland and marshy grassland.
- 4.6.84 There were otter and mountain hare signs recorded within the Study Area. These included an otter holt location, couch locations, spraints and feeding signs which were largely along the section of coastline.
- 4.6.85 Potential direct and indirect impacts were assessed following best practice guidance and were considered both during construction and during operation. Impacts on potentially sensitive ecological receptors were avoided and minimised wherever possible in line with NPF4 and best practice guidance and were incorporated into the design process (embedded mitigation).
- 4.6.86 The assessment does not predict any likely significant ecological residual effects associated with the construction and operation of the Proposed Development.
- 4.6.87 As in relation to ornithology, extensive opportunities for ecological restoration and enhancement are described in the OBEHMP in accordance with Policy 3 of NPF4. This is further referenced below.

(x) Trees, woods and forests

- 4.6.88 Woodland impact was scoped out of the EIA.

(xi) Decommissioning and (xii) site restoration plans

- 4.6.89 Effects of decommissioning has been addressed in the EIA. Planning conditions relating to site restoration would be attached to any grant of consent.

Balancing the Contribution of a Development and Conclusions on Policy 11

- 4.6.90 Paragraph e (ii) of Policy 11 makes it clear and recognises that in terms of significant landscape and visual impacts, such impacts are to be expected for some forms of renewable energy. This is a very clear steer that significant effects are to be expected, and where localised and/or subject to appropriate design mitigation, they should generally be acceptable. The LVIA concludes that the significant landscape and visual impacts would be localised, and that appropriate design mitigation has been adopted.
- 4.6.91 In addition, the Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria.
- 4.6.92 The second to last paragraph of **Paragraph e) of Policy 11** is expressly clear that in considering any identified impacts of renewable energy developments, significant weight must be placed on the contribution of the proposal to renewable energy generation targets and greenhouse gas emissions reduction targets. The "contributions" are inextricably related to the scale of a proposed development and policy recognises that any identified impacts must be assessed in the context of these contributions.

4.7 NPF4 Policy 3: Biodiversity

Policy 3 & Principles

- 4.7.1 Policy 3 has an intent to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Outcomes of the policy are that biodiversity is enhanced and better connected, including through strengthened nature networks and nature-based solutions.
- 4.7.2 **Policy 3** requires developments to, wherever feasible, provide nature-based solutions that have been integrated and made best use of and for significant biodiversity enhancements to be provided.
- 4.7.3 **Paragraph b)** states that:
- “Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria.”*
- 4.7.4 The policy goes on to reference the need for an understanding of the existing characteristics of a site and states that an assessment of potential negative effects should be undertaken which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements.
- 4.7.5 **Paragraph b) iv.** of the policy sets out a requirement that *“significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate.”*
- 4.7.6 **Paragraph d)** adds that *“any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration”.*

Current Guidance Position

- 4.7.7 The **letter from the Chief Planner issued on 8 February 2023** refers to the application of Policy 3 where specific supporting guidance / parameters for assessment are not yet available to aid assessments.
- 4.7.8 NPF4 Policy 3 Biodiversity is specifically recognised as one such policy area where final guidance is not yet available. The Chief Planner's letter states:
- “recognising that currently there is no single accepted methodology for calculating and / or measuring biodiversity ‘enhancement’ – we have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. There will be some proposals which will not give rise for opportunities to contribute to the enhancement of biodiversity, and it will be for the decision maker to take into account the policies in NPF4 as a whole, together with material considerations in each case”.* (underlining added)

- 4.7.9 Therefore, exactly how enhancement is to be measured in the longer-term is to be the subject of further guidance, but a timescale for the production of such guidance is at present unclear.
- 4.7.10 The Scottish Government published '**Planning Guidance: Biodiversity**'²⁵ (Biodiversity Guidance) in December 2025. Paragraph 1.1 states that it:
- "Sets out the Scottish Minister's expectations for implementing NPF4 policies which support the cross cutting NPF4 outcome 'improving biodiversity.'"*
- 4.7.11 The Biodiversity Guidance refers to 'key terms' and with regard to 'enhancement', states at Paragraph 1.10:
- "The terms 'enhance' and 'enhancement' are widely used in NPF4. In order for biodiversity to be 'enhanced' it will need to be demonstrated that it will be in an overall better state than before intervention, and that this will be sustained in the future. Development proposals should clearly set out the type and scale of enhancements they will deliver".*
- 4.7.12 The Biodiversity Guidance refers to 'key terms' and with regard to 'enhancement', states at Paragraph 1.10:
- "The terms 'enhance' and 'enhancement' are widely used in NPF4. In order for biodiversity to be 'enhanced' it will need to be demonstrated that it will be in an overall better state than before intervention, and that this will be sustained in the future. Development proposals should clearly set out the type and scale of enhancements they will deliver".*
- 4.7.13 Page 17 of the Biodiversity Guidance makes specific reference to determining planning applications and, with regard to the policy context, Paragraph 4.1 makes it clear that NPF4 must be read and applied as a whole. Specific reference to NPF4 Policy 3 (Biodiversity) Part 3 b) is made and from Section 4.6 key points include the following:
- > It is set out that NPF4 that does not specify or require a particular assessment approach or methodology to be used, although the policy makes clear that best practice assessment methods should be utilised; and
 - > Assessments can be qualitative or quantitative (for example through use of a metric).
- 4.7.14 Section 4.12 of the Biodiversity Guidance states:
- "In the meantime, the absence of a universally adopted Scottish methodology/tool should not be used to frustrate or delay decision making, and a flexible approach will be required. Wherever relevant and applicable, and as indicated above, information and evidence gathered for statutory and other assessment obligations, such as EIA, can be utilised to demonstrate those ways in which the policy tests set out in NPF4 have been met. Equally, where a developer wishes to use an established metric or tool, the planning submission should demonstrate how Scotland's habitats and environmental conditions have been taken into account. Where an established metric or tool has been modified, the changes made and the reasons for this should be clearly set out".*
- 4.7.15 Section 4.14 states that it will be for a planning authority to determine whether the relevant policy criteria have been met, taking into account the circumstances of the particular proposal. The Biodiversity Guidance adds:
- "NPF4 does not specify how much enhancement or 'net gain' should be delivered, though biodiversity should clearly be left in a 'demonstrably better state' than without intervention. Rather, the selection and design of enhancements will be a matter of judgement based on the circumstances of the individual case, taking into account a range of considerations."*
- 4.7.16 The Biodiversity Guidance also makes reference to off-site delivery of enhancement proposals and states at Paragraph 4.19 that:

²⁵ Scottish Government (2025) Planning Guidance: Biodiversity
<https://www.gov.scot/publications/scottish-government-planning-guidance-biodiversity/>

“Where the relevant policy tests cannot be met on site, off-site provision may be considered alongside on site. In these circumstances, off-site delivery should be as close as possible to the development site, with consideration being given firstly to the immediate landscape context and existing ecological value of the site.”

- 4.7.17 In early 2024 NatureScot consulted on ‘a Biodiversity Metric for Scotland’s Planning System’. The Biodiversity Guidance notes that NatureScot has commenced work to develop an adapted biodiversity metric suitable for use in supporting delivery of NPF4 policy 3b. This includes guidance on the use of existing biodiversity metrics in the Scottish Planning system.
- 4.7.18 The 2024 consultation paper did not propose solutions or reach conclusions on specific aspects of the Scottish biodiversity metric to be developed, as these are yet to be fully assessed. While work on developing a Scottish biodiversity metric is ongoing, NatureScot highlighted the advice set out in the Scottish Government’s draft Planning Guidance on Biodiversity, now finalised and referenced above, namely that *“the absence of a universally adopted Scottish methodology / tool at the present time, should not be used to frustrate or delay decision making”*. (Paragraph 4.12)
- 4.7.19 NatureScot advised in October 2025²⁶ that a consultation on a working draft metric and associated guidance is planned for mid-2026 and expect a Scottish metric to be fully available to use in 2027.
- 4.7.20 NatureScot have also published a Research Report²⁷ which was a review of habitat classifications for their potential use in a Scottish planning biodiversity metric in early 2026. This report reviews and makes recommendations for systems of vegetation classification to be used to provide data for a Scottish planning biodiversity metric (“the Scottish metric”).

The application of Policy 3

- 4.7.21 Notwithstanding the lack of policy guidance at the present time, in terms of environmental benefit, it can be concluded that there would be permanent biodiversity enhancement delivered through the Applicant’s proposed compensation and enhancements to the natural habitat, offered as part of the Proposed Development.
- 4.7.22 As referenced previously, a OBEHMP has been produced which sets out measures to achieve significant biodiversity enhancement at the Site. The OBEMP is contained in **Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4**.
- 4.7.23 The measures proposed are informed by an understanding of the existing characteristics of the Site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats.
- 4.7.24 The overall aim of the OBEHMP is to conserve, enhance and restore important biodiversity (both habitats and species) around the Proposed Development. Given the generality of this overall aim, it has been subdivided into seven discrete ‘Objectives’ for which particular work packages and methods have been outlined as follows:
- > Objective 1: Peatland restoration within the Land Under Applicant’s Control;
 - > Objective 2: Reduce grazing pressure;
 - > Objective 3: Creating and strengthening nature networks both within and outside the Land Under Applicant’s Control;

²⁶ NatureScot (October 2025) Scottish Biodiversity Metric Update
<https://www.youtube.com/watch?v=DyuMmd1nNb4>

²⁷ NatureScot (2026) NatureScot Research Report 1391 – A review of habitat classifications for their potential use in a Scottish planning biodiversity metric Available at:
<https://www.nature.scot/doc/naturescot-research-report-1391-review-habitat-classifications-their-potential-use-scottish-planning#summary>

- > Objective 4: Creation of artificial otter holts within the Land Under Applicant's Control;
- > Objective 5: Removal of waste along the coastline;
- > Objective 6: Creation of wader scrapes; and
- > Objective 7: Offsite Biodiversity Enhancement and Habitat Management.

4.7.25 Within the Land Under Applicant's Control the OBEHMP aims to:

- > Sensitively restore c. 84.5 ha of bog of Actively Eroding bog.
- > Reinstate 8.5 ha of reseeded grassland into blanket bog habitat.
- > Restore c. 52.0 km of erosion features and gullies.
- > Block all c. 27.7 km of drainage ditches and c. 40.9km of historic drains with flush like habitat.
- > Restore c. 0.8 km of peat cutting.

4.7.26 Combined, this would result in an estimated total guaranteed commitment of c. 247.9 ha of peatland restoration within the Land Under Applicant's Control.

4.7.27 The OBEHMP should be referred to in relation to all proposed biodiversity enhancement and management measures. The enhancement proposals would result in the Site, from a biodiversity perspective, being in a "*demonstrably better state*" than without intervention, consistent with the provisions of Policy 3.

4.7.28 It is important to keep in mind that the greatest threat to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a significant contribution of renewable energy generation, to facilitate the earliest possible decarbonisation of the energy system and the achievement of net zero no later than 2045. A fundamental purpose of net zero is to protect biodiversity and the earlier it can be achieved, the greater the benefits will be to biodiversity.

4.8 NPF4 Policy 4: Natural Places

Policy 4 and Principles

4.8.1 The policy has an intent to protect, restore and enhance natural assets making best use of nature-based solutions. Policy outcomes are stated as being natural places are protected and restored, and natural assets are managed in a sustainable way that maintains and grows their essential benefits and services.

4.8.2 **Paragraph a)** of the policy states that development proposals which by virtue of type location or scale will have an unacceptable impact on the natural environment will not be supported.

4.8.3 **Paragraph b)** addresses both nature conservation and landscape designations. Part b deals with development proposals likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas). Part c deals with national landscape designations and also SSSIs and National Nature Reserves.

4.8.4 **Paragraph c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park or a National Scenic Area (NSA) should be addressed.

4.8.5 Paragraph d) deals with local landscape designations. Policy 4d) is as follows:

"Development proposals that affect a site designated as ...a local landscape area in the LDP will only be supported where:

- > *Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*

- > *Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance”.*

4.8.6 The policy follows a similar construct to that which deals with national level designations. The first limb of the policy refers to significant effects on the *“integrity”* of the area or *“the qualities for which it has been identified”*.

4.8.7 The policy sets out in the second limb of NPF4 Policy 4, Part d) that development proposals that affect a site designated as a local landscape area in the LDP (Local Landscape Areas - LLAs in this case) will only be supported where any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. It must be noted that:

- > this policy provision, reflects the wider NPF4 policy that adverse effects (including adverse landscape and visual effects outside of a National Park or NSA) must be balanced against the benefits of a development for which significant weight must be given;
- > the second limb is independent of the first (“or”) and is to be applied where a decision-maker concludes that a development will have significant adverse effects on the integrity of a local designation;
- > NPF4, Policy 4, Part d) now expressly includes a balancing mechanism (*“clearly outweighed by social, environmental or economic benefits”*) and sets out the threshold to be used (*“of at least local importance”*).

4.8.8 **Paragraph f)** deal with species protected by legislation. Development proposals that are likely to have an adverse effect on protected species will only be supported where the proposal meets the relevant statutory tests.

4.8.9 **Paragraph g)** deals with development proposals located within wild land areas. It notes that buffer zones around wild land will not be applied, and effects of development outwith wild land areas will not be a significant consideration.

Application of Policy 4

4.8.10 **Policy 4, Paragraph a)** of the policy states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment will not be supported. This Planning Statement has examined the impact of the Proposed Development on the natural environment through review of the EIA Report. Subject to the proposed embedded and additional (where required) mitigation there would be no unacceptable effects on the environment.

4.8.11 **Policy 4 paragraph b)** refers to development proposals which are likely to have a significant effect on a European designated site and sets out in such circumstances the requirement for Appropriate Assessment (‘AA’).

4.8.12 **Policy 4, Paragraph c)** deals with national landscape designations and has a similar approach in relation to the former SPP in terms of how a proposal that affects a National Park, or a NSA should be addressed. As noted above, the Site is not subject to any national landscape designations.

4.8.13 **Policy 4, Paragraph d)** deals with local landscape designations and the key provisions are set out above.

4.8.14 **Policy 4, Paragraph g)** relates to proposals within Wild Land Areas (‘WLA’).

Conclusions on Policy 4

4.8.15 Designated sites relating to the nature conservation have been assessed above under Policy 11 and no significant effects are predicted.

- 4.8.16 The effects in relation to national and local landscape designations have been addressed in relation to Policy 11. In summary the assessment concludes that there would be significant effects on only one NSA Special Landscape Quality and only in the North Roe NSA area. The integrity of the NSA would not be compromised.
- 4.8.17 The assessment concludes that there would be no significant effects on any LLA and the integrity of LLAs would not be compromised.
- 4.8.18 There is one Wild Land Area ('WLA' 42) in the SLVIA Study Area: WLA 42 Ronas Hill and North Roe, located approximately 8.7 km to the northwest of the Site. As the Proposed Development is outwith the WLA, a detailed assessment of the effects of the Proposed Development on WLA 42 has not been undertaken. As noted above, paragraph g) of Policy 4 states that effects of development outwith WLAs will not be a significant consideration.
- 4.8.19 It should also be noted that the EIA has also fully addressed the relationship of the Proposed Development with international and national designations. Furthermore, studies to identify potentially impacted species (including birds) were undertaken and detailed assessment of relevant species was also undertaken as necessary, as set out in the EIA Report.
- 4.8.20 Given the above position, it is considered that the Proposed Development is in accordance with Policy 4.

4.9 NPF4 Policy 5: Soils

Policy 5 and Principles

- 4.9.1 The policy intent for Policy 5 is to protect carbon rich soils, restore peatlands and minimise disturbance to soils from development. This is very similar to the policy position that was in the former SPP; however, a key difference, as set out in **paragraph c(ii)**, is that renewable energy proposals are one of the types of development expressly envisaged to be acceptable in principle on peatlands, reflecting the net benefits in carbon emissions reduction and peatland restoration potential which can be gained.
- 4.9.2 **Paragraph a)** states that *"development proposals will only be supported if they are designed and constructed:*
- i. in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and*
 - ii. in a manner that protects soil from damage, including from compaction and erosion, and that minimises soil sealing."*
- 4.9.3 **Paragraph d)** states: *"Where development on peatland, carbon rich soils or priority peatland habitat is proposed, a detailed site-specific assessment will be required to identify:*
- i. the baseline depth, habitat condition, quality and stability of carbon rich soils;*
 - ii. the likely effects of the development on peatland, including on soil disturbance; and*
 - iii. the likely net effects of the development on climate emissions and loss of carbon.*

This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A Peat Management Plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/or enhancing the site into a functioning peatland system capable of achieving carbon sequestration."

The application of Policy 5

- 4.9.4 **Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2)** assesses the potential impacts of the Proposed Development on geology and peat and as explained in the

context of Policy 11 above, no significant effects in relation to hydrology, peat and soils are predicted.

4.9.5 Policy 5 is supportive of development proposals on peatland, carbon rich soils and priority peatland habitat in certain circumstances including development for the generation of energy from renewable sources that optimise the contribution of the area to greenhouse gas emissions reductions targets. The Proposed Development falls into this category. The required assessments and information has been provided as required by Policy 5 (d) within the EIA Report.

4.9.6 The Proposed Development is considered to be in accordance with Policy 5.

4.10 NPF4 Policy 7: Historic Assets and Places

Policy 7 and Principles

4.10.1 The intent of the policy is to protect and enhance the historic environment, assets and places and to enable positive change. Key parts of the policy include the following:

- > **Paragraph a)** states that “development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impact of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.”
- > **Paragraph c)** states that “...development proposals affecting the setting of a Listed building should preserve its character, and its special architectural or historic interest”.
- > **Paragraph d)** states that “development proposals in or affecting Conservation Areas will only be supported where the character and appearance of the Conservation Area and its setting is preserved or enhanced. ...”.
- > **Paragraph h)** states that “development proposals affecting Scheduled Monuments will only be supported where:
 - i) direct impact on the Scheduled Monument are avoided;
 - ii) significant adverse impacts on the integrity of the setting of the Scheduled Monument are avoided; or
 - iii) exceptional circumstances have been demonstrated to justify the impact on a Scheduled Monument and its setting and impact on the monument or its setting have been minimised.
- > **Paragraph i)** states that “development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site or its setting”.
- > **Paragraph o)** states that “non designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impact. Historic buildings may also have archaeological significance which is not understood and may require assessment.”.

The application of Policy 7

4.10.2 **Chapter 5: Cultural Heritage (EIAR Volume 2)** addresses the presence of cultural heritage assets which may be affected by the Proposed Development. The assessment considers the

archaeological and cultural heritage value of the Site and assesses the potential for significant effects on archaeological features and heritage assets, both within the Site and in the surrounding area resulting from the construction, operation and decommissioning of the Proposed Development.

- 4.10.3 The Site contains one Scheduled Monument (the Crooksetter Hill north west chambered cairn), and a number of non-designated heritage assets, including post medieval settlement remains and possible prehistoric features. Desk based assessment, walkover survey and review of Historic Environment Scotland ('HES') and SIC Historic Environment Record ('HER') data indicated a high potential for previously unrecorded prehistoric archaeological remains within the Site, as well as a high potential for preserved palaeo-environmental deposits within areas of deep peat.
- 4.10.4 It is explained in the assessment that within the wider study areas, a range of designated heritage assets were identified, including Scheduled Monuments, Listed Buildings and an Inventoried Garden and Designed Landscape. All designated heritage assets within 10 km of the Site were considered for potential setting effects, informed by Zone of Theoretical Visibility ('ZTV') modelling, site visits and visualisations.
- 4.10.5 The Proposed Development has been designed to avoid physical impacts on known heritage assets wherever practicable. No significant physical effects are predicted on designated heritage assets. Potential physical impacts could occur to:
- > previously undiscovered archaeological remains;
 - > a post medieval field boundary; and
 - > limited areas of deep peat with palaeo-environmental potential.
- 4.10.6 Without mitigation, impacts on unknown archaeological remains could be significant. However, it is explained that with the implementation of appropriate archaeological mitigation, residual effects would be avoided or would be offset through preservation by record and are not expected to result in unacceptable harm.
- 4.10.7 No physical impacts on archaeological remains are predicted during operation. Operational effects would relate solely to changes to the setting of heritage assets. The assessment identified:
- > Moderate (significant in EIA terms) effects on the settings of three Scheduled Monuments:
 - Graven chambered cairn;
 - Crooksetter Hill south east chambered cairn; and
 - Crooksetter Hill north west chambered cairn.
 - > Minor, negligible, or neutral effects on the settings of other designated heritage assets, which are not significant in EIA terms.
- 4.10.8 Although moderate effects have been identified, in each case the assessment concludes that in the context of the NPF4 Policy 7h) test it is considered that the understanding, appreciation and experience of the scheduled monuments would be adequately retained such that the integrity of settings would not be significantly adversely affected
- 4.10.9 Cumulative effects with other consented and proposed wind energy developments were assessed. The assessment concludes that cumulative impacts would not increase the level of effect beyond those identified for the Proposed Development alone, and no additional significant cumulative effects are predicted.
- 4.10.10 Embedded mitigation through design has been central to avoiding or reducing impacts, particularly through turbine siting and buffering of known heritage assets. Additional mitigation during construction includes:

- > archaeological watching briefs;
- > targeted metal detecting surveys; and
- > palaeo-environmental sampling of deep peat deposits.

4.10.11 These measures would be secured through planning conditions and consultation with SIC. No further mitigation is available for setting effects beyond design led measures, and therefore residual operational effects remain unchanged from the assessed effects. Enhancement and interpretation opportunities are proposed to provide public benefit and improve understanding of the Site's cultural heritage.

4.10.12 The assessment concludes that, while the Proposed Development would give rise to moderate and EIA Significant effects on the setting of three Scheduled Monuments, these effects would not result in unacceptable harm to cultural heritage interests when considered against national policy. All other effects are minor, negligible or neutral. With appropriate mitigation and management in place, the Proposed Development is considered to be acceptable in cultural heritage and archaeological terms.

4.10.13 The Proposed Development is considered to be in accordance with Policy 7.

Alternative Position & Exceptional Circumstances

4.10.14 Following submission of the Section 36 application and its consideration by consultees, in the event that a position is taken by a consultee or the decision maker that the effects on the settings of the three Scheduled Monuments referenced above, which would experience a significant effect on their settings, are such that the integrity of the respective settings would be significantly adversely affected, then it is considered that in those circumstances, NPF4 Policy 7, Part h) iii) is engaged and that there are exceptional circumstances which have been demonstrated to justify such impacts.

4.10.15 There is no definition of exceptional circumstances in NPF4. It is considered that the term "exceptional circumstances" generally refer to something that is not commonplace and is relevant to a particular situation. With particular regard to Policy 7, Part h) iii), it is submitted that the phrase means factors which do not ordinarily feature in an application for consent for development of this type, or which do not routinely arise, or which are unusual or unique to the application in question.

4.10.16 The particular exceptional circumstance in this case is considered to be the significant contribution to decarbonisation of the SVT. As set out in Chapter 3 (and in the Socio-Economic Statement) the Proposed Development can play a key and pioneering role as a catalyst for Shetland's energy transition and by way of a direct wire connection to the adjacent SVT to the west of the Site. The development provides the opportunity to accelerate EnQuest and Veri Energy's decarbonisation plans.

4.10.17 It is considered that the Proposed Development has a unique role to play in the maximisation of this particular decarbonisation opportunity at this location, which is provided by the immediate adjacency of the project to the SVT. In addition, the national importance of the development enhances the justification for exceptional circumstances in the case of the application given, as explained in Chapters 3 and 4, the Proposed Development would help attain two National Developments: ND1 'Energy Innovation Development on the Islands' and ND3 'Strategic Renewable Electricity Generation'. Moreover, the Proposed Development by way of the grid link direct to SVT will enable the early deployment of onshore wind and it will not therefore face the conventional grid connection uncertainty.

4.10.18 The Proposed Development is therefore not a standard wind energy project but is a strategically significant infrastructure investment that can accelerate the decarbonisation of the SVT and in turn, can accelerate Shetland's and Scotland's wider net zero transition.

4.11 NPF4 Policy 22: Flood Risk and Water Management

- 4.11.1 The intent of Policy 22 is to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding. **Paragraph c)** is the most relevant part of the policy for the Proposed Development, which states that development proposals should not increase the risk of surface water flooding to others, or itself be at risk. In addition, all rain and surface water should be managed through SuDS.

Application of Policy 22

- 4.11.2 The Proposed Development would be located outside of areas shown by Scottish Environment Protection Agency ('SEPA') Flood Risk maps to be at risk of flooding from rivers and that surface water flood risks would be accounted for during detailed drainage design.
- 4.11.3 The Proposed Development is considered to accord with Policy 22.

4.12 Conclusions on NPF4 Appraisal

- 4.12.1 The Proposed Development is considered to be acceptable in relation to all of Policy 11's environmental and technical topic criteria and in relation to all other relevant NPF4 policies.
- 4.12.2 A key point within Policy 11 (Energy) is that any identified impacts must be weighed against a proposed development's specific contribution to meeting targets – which attracts significant positive weight in this case.
- 4.12.3 Significant weight is also afforded in relation to Policy 1 (Tackling the climate and nature crises). This policy direction fundamentally alters the planning balance compared to the position that was set out in NPF3 and SPP.
- 4.12.4 The term "tackling" the respective crises in Policy 1 is also important – this means that decision makers should ensure an urgent and positive response to these issues and take positive action.
- 4.12.5 Significant adverse effects have been predicted in relation to landscape and visual matters and in relation to three designated heritage assets.
- > In relation to landscape and visual matters these are considered to be localised in nature and appropriate design mitigation has been applied from the outset of the Proposed Development such that those effects which remain are considered acceptable.
 - > In relation to cultural heritage matters, as explained above under Policy 7, which significant adverse effects are predicted, these are deemed to be acceptable in the context of the tests set out within Policy 7.
- 4.12.6 Overall, the Proposed Development is considered to be one that would make a valuable contribution to the NPF4 Spatial Strategy and would help deliver a 'sustainable place'.
- 4.12.7 Overall, it is considered that Proposed Development would accord with relevant policies of NPF4, and with NPF4 when read as a whole.

5. Appraisal against the Local Development Plan & Local Guidance

5.1 Introduction

- 5.1.1 The other element of the statutory Development Plan covering the Site is the Shetland Local Development Plan ('SLDP') (2014);
- 5.1.2 The SLDP was prepared and adopted prior to NPF4 coming into force and reflects the provisions of the former SPP, now superseded. Where incompatibilities exist between the SLDP and NPF4, or where the SLDP is silent, the policies of the NPF4 prevail.
- 5.1.3 Relevant policies from the SLDP are referenced below. This chapter does not present a detailed assessment of the Proposed Development as that has been covered in Chapter 4 above against the policy provisions of NPF4. An appraisal of relevant SLDP policies and consideration of areas of conflict with NPF4 is provided.

5.2 SLDP Policy Provisions

Policy RE1 'Renewable Energy'

- 5.2.1 Policy RE1 'Renewable Energy' is the lead SLDP policy in relation to the Proposed Development. Policy RE1, Renewable Energy states:

"The Council is committed to delivering renewable energy developments that contribute to the sustainable development of Shetland. Proposals for renewable energy developments will be supported where it can be demonstrated that there are no unacceptable impacts on people (benefits and disbenefits for communities and tourism and recreation interests) the natural and water environment, landscape, historic environment and the built environment and cultural heritage of Shetland.

All proposals for renewable energy developments will be assessed with consideration of their cumulative impacts".

Other Relevant LDP Policies

- 5.2.2 The other policies of relevance in the SLDP are summarised below in **Table 5.1** with brief comment added with regard to how the policies relate to the policies of NPF4, where relevant.

Table 5.1: Relevant SLDP Policies & Comment regarding NPF4

SLDP Policy	Topic	Policy Summary	Comment re NPF4
GP1	Sustainable Development	Development will be planned to meet the economic and social needs of Shetland in a manner which does not compromise the ability of future generations to meet their own needs and to enjoy the area's high-quality environment. Tackling climate change and associated risks is a major consideration for all development proposals.	The provisions of this general policy insofar as relevant are contained within the scope of NPF4 Policy 11. No conflicts or contradictions.
GP2	General Requirements for All Development	Applications should not adversely affect the integrity or viability of sites designated for their landscape and natural heritage value, should be designed to minimise the use of energy and adapt to impacts from climate change, should have suitable access and parking, should not have significant effect on existing uses, should comply with health and safety standards and should be consistent with national and local policies and Supplementary Guidance.	The provisions of this general policy insofar as relevant are contained within the scope of NPF4 Policy 11. No conflicts or contradictions.
GP3	Layout and Design	All development should be sited and designed to respect the character and local distinctiveness of the site.	The provisions of this policy insofar as relevant to the Proposed Development are contained within the scope of NPF4 Policy 11. No conflicts or contradictions.
NH1	International and National Designations	Requires that all proposals likely to have a significant effect on internationally important sites and not directly connected with or necessary to the conservation management of those sites will be subject to an assessment of the implications for the site's conservation objectives. Significant effects will only be permitted where an appropriate assessment demonstrates there will be no adverse effect on integrity, there are no alternatives and there are imperative reasons of overriding public interest. Developments affecting National Designations will only be permitted where there is no adverse effect on integrity of designation and any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance.	NPF4 Policy 4 deals with natural heritage matters and international and national designations. No conflicts or contradictions.

SLDP Policy	Topic	Policy Summary	Comment re NPF4
NH2	Protected Species	Requires the assessment of potential significant effects on protected species as appropriate. Planning permission will not be granted where adverse effects on European protected species are affected unless it is required for the preservation of public health of public safety or for imperative reasons of overriding public interest, there is no satisfactory alternative, or development will not be detrimental to the maintenance of a population of that species in their natural range. In terms of other protected species the Council will require to be satisfied that the development will give rise to significant social, economic or environmental benefit and there is not satisfactory solution or that it is required for preserving public health or safety. The precautionary principle will be applied where uncertainty arises, and relative assessments should be provided.	NPF4 Policy 4 deals with natural heritage matters. No conflicts or contradictions.
NH3	Furthering the Conservation of Biodiversity	Development will be considered against the Council's obligation to further conservation of biodiversity and the ecosystem services it delivers. The extent of these measures should be relevant and proportionate to the scale of the development. Proposals with a significant adverse effect on habitats or species identified in the Shetland Local Biodiversity Action Plan, Scottish Biodiversity Lise, UK Biodiversity Plan, Annexes I and II of the Habitats Directive, Annex I of the Birds Directive or on the ecosystem services of biodiversity, including cumulative impact will only be permitted where the developer can demonstrate that there will be benefits of overriding public interest and any harm of disturbance to the ecosystem services, continuity and integrity of the habitats or species is avoided, or reduced to acceptable levels by mitigation.	NPF4 Policy 3 deals with Biodiversity and sets a new approach and agenda requiring proposals wherever feasible to provide nature-based solutions integrated into development in order to delivery significant biodiversity enhancement. No conflicts or contradictions.
NH4	Local Designations	Development that affects a Local Nature or Landscape designation will only be permitted where it will not adversely affect the integrity of the area or qualities for which it identified, or any such effects are clearly outweighed by social, environmental or economic benefits.	NPF4 Policy 4 deals with natural heritage matters national and local designations. No conflicts or contradictions.

SLDP Policy	Topic	Policy Summary	Comment re NPF4
NH5	Soils	Development will only be permitted where appropriate measures are taken to maintain soil resources and functions to an extent that it is considered relevant and proportionate to the scale of development. Those with unacceptable effects on soil resources will only be permitted where there is overriding public interest or harm or disturbance to the soil resources and functions is avoided or reduced to acceptable level by mitigation. Evidence of best practise measures should be provided.	NPF4 Policy 5 deals with soils including peatland and related habitat. There is conflict with NPF4. Policy 5 allows for the siting of essential infrastructure and renewable energy development on peatlands, subject to site specific assessments.
NH6	Geodiversity	Development will only be permitted where appropriate measures are taken to protect and/or enhance important geological and geomorphological resources and sites, including those of educational or research value. Proposals that have an unavoidable effect on geodiversity will only be permitted where it has been demonstrated there are benefits of overriding public interest of social or economic nature that outweigh the local, national or international contribution of the affected areas in terms of geodiversity. Any loss should be reduced to acceptable levels by mitigation.	NPF4 Policy 5 deals with soils including peatland and related habitat. No conflicts or contradictions.
HE1	Historic Environment	Provides a presumption in favour of the protection, conservation and enhancement of all elements of Shetland's historic environment.	NPF4 Policy 7 deals with historic assets. No conflict or contradictions.
HE4	Archaeology	Provides that scheduled monuments and designated sites and other identified nationally important archaeological resources should be protected in site and within an appropriate setting. Developments with adverse effects on assets or their settings should not be permitted unless there are exceptional circumstances. All other significant archaeological resources should be preserved in situ wherever feasible, where not possible then appropriate mitigation should be put in place.	NPF4 Policy 7 deals with historic assets. Conflict with NPF4. Policy 7 requires there not to be a "significant" adverse effect on the integrity of the setting of a Scheduled Monument.

5.2.3

It is considered that the Proposed Development would be in accordance with all of the relevant policies in the SLDP as set out in **Table 5.1** above.

5.3 Supplementary Guidance

- 5.3.1 SIC adopted Supplementary Guidance ('SG') entitled 'Onshore Wind Energy' in February 2018. It sets out guidance on where in principle large scale onshore wind energy developments and all associated infrastructure are likely to be acceptable and provides a policy framework for SIC to use as a basis for consultation responses in relation to Section 36 applications for wind energy development.
- 5.3.2 The SG is dated and makes reference to a policy approach grounded in the Spatial Framework principles of the former SPP. This aspect of the SG is therefore no longer part of the current national planning policy approach for wind energy development and should be afforded no weight.
- 5.3.3 The SG states that the LDP is the main policy reference for all development within Shetland. As explained above, the LDP now forms part of an updated Development Plan position alongside the more recently published NPF4.
- 5.3.4 The SG repeats LDP policies, in particular LDP Policy RE1 'Renewable Energy'. Section 2 of the SG sets out development criteria and lists a number of policies which it states will be used to determine planning applications for onshore wind energy proposals. The policies are as follows:
- > DC1 Landscape and Visual Impact;
 - > DC2 Cumulative Impact;
 - > DC3 Natural Heritage;
 - > DC4 Impacts on Communities;
 - > DC5 Water Resources;
 - > DC6 Decommissioning;
 - > DC7 Historic Environment.
- 5.3.5 Although referenced as policies, these provisions contain descriptions of supporting information the Council will require in order to consider applications for consent. The topics reflect those already contained within the wider scope of the SLDP policy provisions, and indeed those of NPF4.
- 5.3.6 Overall, the SG document is now, as noted dated, and its main provisions in terms of a Spatial Framework reflect the former national planning policy approach to wind energy development and should be afforded no weight. The remaining aspects of the SG largely cross refer to what is already within the SLDP and overall, therefore, the document carries limited weight given the updated Development Plan position now available by way of NPF4.

5.4 The Shetland Energy Strategy

- 5.4.1 The Shetland Energy Strategy ('SES') remains in draft form, and it was first published in October 2025. It is a framework to guide local decision making on local energy transition projects. It is set within the UK context of climate change and emission reduction targets and references the Shetland Net Zero Route Map which highlighted the magnitude of the challenge for Shetland in relation to decarbonisation. Reference is made to the particular need for an energy strategy for Shetland given it has been a major oil and gas energy hub for nearly 50 years and the Government is progressing a just energy transition. It states that Shetland has "access to world class natural resources, particularly wind energy." The SES therefore emphasises a particular "Shetland approach" recognising unique local interests, challenges and opportunities and to ensure that the benefits of the energy transition are shared fairly across the wider community.

- 5.4.2 The SES acknowledges that Shetland has a cold climate and is windy. It states (page 4):
“Our natural resources are key to a cleaner future, but our climate means people spend more money on their energy bills to keep their homes and businesses warm. The transition to net zero is an opportunity to make things fairer.”
- 5.4.3 The SES (page 5) sets out a number of key issues and these include:
- > Climate change mitigation and adaptation.
 - > The maturation and general decline of oil and gas production.
 - > The high cost of living and doing business in Shetland.
 - > The development of large scale onshore and offshore renewable energy generation on and around Shetland.
 - > The potential development of large scale hydrogen and associated E-fuel production from onshore and offshore renewable generation.
 - > Balancing such developments with protection of the natural environment and the existing economy.
 - > The need to create and retain local wealth, supporting existing industries to decarbonise and remain competitive, economic diversification and maximising community benefit.
- 5.4.4 Specific reference is made to a Just Energy Transition and the strategy states “We are now entering a new era of energy transition to take us away from the use of fossil fuels. These fuels have provided a super source of energy for over 200 years, from industrial use of coal to natural gas... in Shetland there is and will be both island based and external interest in developing clean energy projects. Some factors could be managed but many are out with our control and as a result we need to have a plan how we manage change.”
- 5.4.5 Opportunities identified include economic diversification, local supply chain growth and leveraging Shetland’s renewable resources for local benefit.
- 5.4.6 The SES sets out a number of active energy transition projects (page 16) and this includes the proposed Neshion Energy Park.
- 5.4.7 The strategy remains in draft form however it is considered that the proposed development would have a strong fit with the aims and objectives of the SES and it is an up to date and important consideration.

5.5 Conclusions on the LDP

- 5.5.1 The relevant development management considerations have been addressed above (Chapter 4) in the context of NPF4 Policy 11 and are not repeated with reference to the SLDP.
- 5.5.2 It is considered that the effects arising from the Proposed Development would not be unacceptable in terms of Policy RE1 or indeed other relevant policies within the SLDP.
- 5.5.3 Moreover, through considering the other relevant policies, it is considered that the Proposed Development accords with the SLDP when it is read as whole.
- 5.5.4 There are a number of incompatibilities between the SLDP policies and the policies of NPF4 as explained above. This means, as per the amendments made to the 1997 Act, the provisions of NPF4 (which is the most recent part of the Development Plan) must prevail.
- 5.5.5 Insofar as there are other relevant policies within the SLDP, they are considered to be generally consistent with those of NPF4 and given the appraisal set out above in Chapter 4 in relation to the various environmental and technical topics of relevance to the proposal, there would be no conflict with their terms.

6. Conclusions

6.1 The Climate Crisis & Renewable Energy Policy Framework

- 6.1.1 The urgent need for onshore wind energy generation has been set out: a large increase in the deployment of this renewable energy technology is supported through a number of policy documents and by Scottish Government commitments – most recently expressed in the OWPS and in NPF4.
- 6.1.2 Onshore wind energy generation was already viewed and described as “vital” to the attainment of targets in 2017. This imperative has only increased since a ‘climate emergency’ was declared by the Scottish First Minister in April 2019, in line with the recommendations made by the CCC (2019) ‘net zero’ publication²⁸. Furthermore, the drive to attain net zero emissions is now legally binding at the UK and Scottish Government levels by way of amendments to the 2008 Act, and in Scotland through the provisions of the Climate Change (Scotland) Act 2009 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.
- 6.1.3 Achieving net zero is a legal requirement, and the Scottish Government has recognised, in the OWPS, that a very substantial quantity of onshore wind energy generation is required to meet the onshore wind energy target requirement by 2030 – namely a minimum of 20 GW of operational capacity. Deployment of more onshore wind energy is described as being “*mission critical for meeting our climate targets*” in the OWPS.
- 6.1.4 The important benefits of the Proposed Development have been set out in the context of the current climate emergency and would help address the issue of tackling climate change, meeting very challenging net zero targets, and would contribute to improving security of supply.

6.2 The Planning Balance

- 6.2.1 In NPF4 there is a clear recognition that climate change must become a primary guiding principle for all plans and decisions. Significant weight is to be given to the climate emergency and the contribution of individual developments to tackling climate change.
- 6.2.2 The revised OWPS was published in December 2022. NPF4 came into force on 13 February 2023. Both are up to date statements of Scottish Government policy, directly applicable to determination of this Section 36 application. Both should be afforded very considerable weight in decision-making.
- 6.2.3 NPF4 and the OWPS are unambiguous as regards the policy imperative to combat climate change, the crucial role of further onshore wind energy generation in doing so, and the scale and urgency of onshore wind energy deployment required. As described in this Planning Statement:
- > The global climate emergency and the nature crisis are the foundations for the NPF4 Spatial Strategy as a whole. The twin global climate and nature crises are “*at the heart of our vision for a future Scotland*” so that “*the decisions we make today will be in the long-term interest of our country*”. The policy position, and the priority afforded to combatting the climate emergency, is different to that which was set out in the former NPF3 and SPP;
 - > NPF4 Policy 1 (Tackling the climate and nature crises) directs decision-makers to give significant weight to the global climate emergency in all decisions. This is a radical departure from the previous approach to policy and weight and clearly denotes a step change in planning policy response to climate change. The matter of weight is no longer left entirely to the discretion of the decision maker; and

²⁸ CCC, Net Zero, The UK’s contribution to stopping global warming (May, 2019).

- > Both NPF4 and the OWPS are clear that further onshore wind energy development, of scale and utilising modern, larger turbines, has a crucial role in combatting climate change, transitioning to a net zero Scotland and ensuring security of energy supply. NPF4 Policy 11 (Energy) strongly supports proposals for all forms of renewable, low-carbon and zero emissions energy technologies, including onshore wind farms.
- 6.2.4 It is important to fully recognise both the scale and urgency of the challenge set out in these documents, and the required response from decision-makers. NPF4 is clear that significant progress must be made by 2030 requiring, as set out in the OWPS, that *“we must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes”*.
- 6.2.5 Publication of the OWPS for the first time set an onshore wind target: a Scottish Government ambition for **a minimum of 20 GW** of installed onshore wind capacity by 2030. As noted, good progress has been made to reach this but there is still more to do. This target is also embedded in the Scottish Government’s consultative draft Energy Strategy and Just Transition Plan, together with the commitment to *“place the climate and nature at the centre of our planning system”* (original emphasis) in line with the NPF4.
- 6.2.6 By any measure, the identified need for delivery of this additional capacity is a massive challenge requiring an urgent and positive response. The ‘window’ until the key date of 2045 for net zero is getting narrower.
- 6.2.7 As the Statement of Need for Strategic Renewable Electricity Generation and Transmission Infrastructure within NPF4 explains *“A large and rapid increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets.”*
- 6.2.8 The Statement of Need relates to the attainment of Government renewable energy generation and emission reduction targets. Moreover, it relates to the importance of developing electricity supplies which are not dependent on volatile international markets and are located within the UK’s national boundaries. The urgency for an electricity system which is self-reliant and not reliant on fossil fuels is now enormous, in order to protect consumers from high and volatile energy prices.
- 6.2.9 As explained, the Proposed Development would help deliver NPF4 National Developments 1 and 3, namely “Energy Innovation Development on the Islands” “Strategic Renewable Electricity Generation and Transmission Infrastructure”.
- 6.2.10 NPF4 states that a number of classes of development apply to ND1 for the delivery of renewable and low carbon aspects of the ORION project including:
 - > **New or updated on and/or offshore infrastructure for energy generation from renewables exceeding 50 megawatts capacity;**
 - > Electricity transmission cables and converter stations on and/or offshore of/ or exceeding 132kV;
 - > **Infrastructure for the production, storage and transportation of low and zero carbon fuels (that are not electricity or heat) including renewable hydrogen; and hydrogen producing and hydrogen production related chemicals.... linked to transport, storage and utilisation infrastructure at Sullom Voe;**
 - > Oil terminal modifications at Sullom Voe to maintain asset use moving towards net zero emissions. (emphasis added)
- 6.2.11 Other policy support for development of wind farms is found in NPF4 and the OWPS:
 - > In addition to the cross-cutting NPF4 Policy 1 (Tackling the climate and nature crises), NPF Policy 11 (Energy) directs that in considering the identified impacts of an onshore wind proposal significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets;

- > The OWPS expressly recognises that meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines and that *“this will change the landscape”*.
- > NPF4 Policy 11 confirms that significant landscape and visual impacts are to be expected for some forms of renewable energy. NPF4, which forms part of the Development Plan, is clear that where such impacts are localised and / or appropriate design mitigation has been applied, they will generally be considered to be acceptable. Notably, policy recognises that significant landscape and visual effects are inevitable and generally acceptable. As explained the significant landscape and visual effects that would arise would be largely localised.
- > NPF4 Policy 11 provides in principle support for wind farm development in all locations with the exception of National Parks and NSAs. The Site is not within an NSA, and no significant adverse effects on the integrity of the Shetland NSA are predicted.
- > NPF4, Policy 4, Part d) specifically relates to a proposed development that may adversely affect the integrity of a local landscape designation. It provides that development will be supported where significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance. As discussed, there would be no adverse impacts on the integrity of any LLA.
- > In terms of cultural heritage matters, NPF4 Policy 7 (Historic assets and places) makes it clear that development affecting Scheduled Monuments will be supported if significant effects on the integrity of the setting of a monument are avoided. As discussed, whilst there would significant effects on the setting of three Scheduled Monuments, there would not be a significant adverse effect on the integrity of settings from the Proposed Development.
- > In relation to biodiversity matters, NPF4 Policy 3 (Biodiversity) requires that for national and EIA development, significant biodiversity enhancements be provided. The Applicant has proposed such measures as set out in the OBEHMP.
- > In relation to NPF4 Policy 5 (Soils) the policy framework supports development proposals on peatland and carbon rich soil where they relate to the generation of energy from renewable sources. Such development requires to be subject to a site-specific assessment which has been undertaken in this case for the Proposed Development. As explained, the siting and design approach has sought to minimise adverse impacts on peatland and carbon rich soils and avoid the areas of deepest peat where possible, while balancing other environmental constraints.

- 6.2.12 The Applicant has gone to considerable lengths to ensure a satisfactory layout, design and composition for the Proposed Development. In short, appropriate design mitigation has been applied. Potentially significant adverse effects resulting from the Proposed Development have been addressed through an iterative design process (i.e. ‘mitigation by design’) and a well-considered proposal has been established, which has acceptable effects.
- 6.2.13 NPF4 and the OWPS require that the decision-maker must identify and weigh the adverse effects of a proposed development. However, increased weight is to be given to the benefits of a development in the planning balance owing to the seriousness and importance of energy policy related considerations and the contribution of the Proposed Development to meeting climate change targets.
- 6.2.14 It is considered that this approach is very clearly reflected and articulated in NPF4 and the OWPS (subject to Scottish Government policy now expressly stating that significant weight will be given to the global climate and nature crises and a proposed development’s contribution towards meeting targets). Moreover, Section 3.6 of the OWPS states that the criteria for assessing proposals (in NPF4) have been updated *“including stronger weight being afforded to the contribution of the development to the climate emergency”*.

6.2.15 In this case, the Proposed Development is National Development and essential infrastructure which will help to deliver the National Spatial Strategy set out in NPF4. The Proposed Development would make a valuable contribution to help Scotland, and the UK attain net zero, security of supply and related socio-economic objectives. Significant weight should be given to this contribution when weighing the need for the Proposed Development and its limited effects within the planning balance.

6.2.16 The effects of the Proposed Development, including how relevant effects listed in NPF4 Policy 11 Paragraph (e) have been addressed, are detailed in the supporting information to the application. In terms of Policy 11, in considering the identified impacts of the Proposed Development, significant weight must be placed on its nationally important contribution to renewable energy generation and greenhouse gas emissions reduction targets.

Consideration of the Associated Grid Connection

6.2.17 As explained in Chapter 1, an application is being made to the Scottish Government Energy Consents Unit (ECU) for Section 36 consent and deemed planning permission, under the terms of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, for permission to construct and operate the Proposed Development.

6.2.18 The Proposed Development would potentially have both a 'private-wire' connection to the neighbouring SVT to supply renewable electricity to a low carbon fuel plant at the terminal, and a connection to the wider electricity grid. At the time of writing (June 2026), it is anticipated that the Proposed Developments grid connection would be made to a proposed Northern Hub (NH) in northern Shetland comprising a 400kV substation, a 200kV substation and High-Voltage Direct Current (HVDC) link converter station, with a proposed link that connects to a proposed HVDC link converter station in the western region of Shetland.

6.2.19 The details of the wider (non-private) grid connection is currently unknown, however it is acknowledged that if the decision maker views the grid connection works and the proposed wind turbines and BESS and related infrastructure as a 'single project' for the purposes of EIA, then there is a need to consider the potential for likely significant effects in combination with the associated connection infrastructure, in so far as it is possible to do so based on the information available at the time of writing.

6.2.20 The wider grid connection would require separate consent under Section 37 of the Electricity Act 1989 and the grid connection application would be made by SSEN Transmission who are responsible for the transmission and distribution of electricity in the north of Scotland. The Section 37 application would duly assess the grid connection route.

6.2.21 It is acknowledged that the deliverability of the wind turbines and BESS may be dependent on securing the necessary Section 37 consent for grid infrastructure, without which the operational benefits of the Proposed Development which are set out in this report would not be achievable.

6.2.22 While the grid connection route is not known or confirmed, the Applicant has examined a number of possible options, which are set out in **Technical Appendix 2.4: Electricity Connection Infrastructure Appraisal (EIAR Volume 4)**. The assessment of the grid connection route options comprises a proportionate assessment of the likely significant effects (LSE) of the grid connection works, in an appropriate manner, in light of the circumstances, in accordance with the EIA Regulations. This assessment provides sufficient information to the decision maker in considering the LSE of the Proposed Development and the associated grid connection in combination, such that the disbenefits of the grid connection can be considered and weighed up in the planning balance.

6.2.23 As such, based on the information before Scottish Ministers, they are in a position to conclude what likely significant effects – or associated disbenefits - would arise from the grid connection for the Proposed Development and weigh those against the considerable benefits and supportive planning policy, as set out within this Planning Statement.

6.2.24 It is also worth noting that, Policy 11 of NPF4 is clear that grid matters should not constrain renewable energy development. It is for developers to agree connections to the grid with the

relevant network operator. The information submitted with this Section 36 application however provides a proportionate assessment of the LSE of the grid connection works, in an appropriate manner, in light of the circumstances, in accordance with the EIA Regulations. Sufficient information is before the decision maker to allow a consideration of the LSE of the Proposed Development and the associated grid connection.

6.3 Overall Conclusions

- 6.3.1 The policy set out in NPF4 and the OWPS requires a rebalancing of the consenting of onshore wind developments in response to the challenges of tackling the climate and nature crises. Having regard to the weight to be ascribed to the important benefits of the Proposed Development and taking into account any disbenefits of the potential grid connection arrangements, it is considered that the benefits that would result clearly outweigh adverse effects.
- 6.3.2 The importance of achieving energy security is one of mass importance, now more than ever. The delivery of renewable energy within the UK is required to ensure that the UK can be fully energy independent and support energy security. The nationally important contribution that the Proposed Development would make to energy security, and the delivery of clean renewable energy is significant.
- 6.3.3 The up-to-date policy set out in NPF4 and the OWPS and the policy being consulted upon in the draft Energy Strategy provide strong and increased support for the grant of consent.
- 6.3.4 The conclusion is that the Proposed Development would be consistent with all relevant policies of the Development Plan - comprising NPF4 and the SLDP - and with the Development Plan when read as a whole.

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