Morven North Offshore Wind Array Project

Additional Application Information

Chapter 5: Planning Statement and Needs Case

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1 Introduction

1.1.1.1 The Morven North Offshore Wind Array Project (hereafter, "Morven North") Planning and Need Statement has been prepared to aid an application for consent for Morven North under Section 36 of the Electricity Act 1989 and the related marine licences (under the provisions of Part 4 of the Marine and Coastal Access Act (MCAA) 2009 for UK waters beyond 12nm). This conforms with the requirements of the following regulations (hereafter referred to as the EIA Regulations):

- in relation to a Section 36 Consent application: The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- in relation to a marine licence application: The Marine Works (Environmental Impact Assessment) Regulations 2007.

1.2 Background (including Applicant)

1.2.1.1 Morven Offshore Wind Limited (MvOWL), a joint venture between JERA Nex bp Limited (JNBP), and EnBW Energie Baden-Württemberg AG (EnBW) (hereafter "the Applicant"), has been awarded a seabed option under the 2021/22 ScotWind Leasing Round for the Morven Option Lease Agreement Site (hereafter "Morven Site"), located wholly within Plan Option Area E1, identified in the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy (the SMP-OWE) (Scottish Government, 2020).

1.2.1.2 The Applicant submitted the Environmental Impact Assessment (EIA) Scoping Report for the Morven Option Lease Agreement Site to Marine Directorate – Licensing and Operations Team (MD-LOT) in July 2023, requesting a formal Scoping Opinion from Scottish Ministers. The Applicant subsequently received the Morven Site Scoping Opinion from Scottish Ministers in November 2023 (MD-LOT, 2023a). Since receiving the Morven Site Scoping Opinion, the Applicant has continued to develop and evolve the Morven Site and made the decision to split the site into two distinct projects, Morven North and the Morven South Offshore Wind Array project (hereafter, "Morven South").

1.3 Project background

1.3.1.1 The Applicant is seeking consent for offshore generation and transmission assets as part of four separate consent applications, which together comprise the Morven Programme (Morven North being one of the four consent applications of the Morven Programme).

1.3.1.2 The design and engineering options considered were informed by the specific conditions and environmental factors within the Morven North Boundary. The Applicant has conducted various desk-based studies and site surveys in the early development stage to inform project design and refine project design parameters. Further studies are expected to be completed beyond the planning phase and into procurement and contracting to inform the final design of Morven North, including layout, numbers, types, sizes and foundation designs for wind turbines and Offshore Substation Platforms (OSPs).

1.3.1.3 The Applicant followed the Project Design Envelope (PDE) approach, meaning that the maximum design parameters for Morven North within this application present the Maximum Design Scenario (MDS) (i.e. the maximum potential extents of the design in order to assess the Likely Significant Effects (LSE[1]) of Morven North). The PDE presented in Volume 1, Chapter 3: Project Description defines the maximum range of design parameters. Within the EIA Report, the Applicant has determined the maximum adverse effects (or minimum beneficial effects) that could occur for given receptor groups, selecting parameters from within the range in the PDE to define the MDS for that receptor group. As a result, for each topic specific assessment, the predicted effects for any alternative parameter within the range will be no greater than those assessed.

1.3.1.4 The final detailed design will be further developed as additional information becomes available from site investigations and as the commercial availability of technologies changes. It should be noted

that the final detailed design for Morven North will be within the PDE parameters presented across the EIA Report. This is a standard approach for large-scale energy projects such as Morven North.

1.3.1.5 The Applicant entered into an Option Lease Agreement for the Morven Site in early 2022, covering approximately 860km^2. Subsequent to the identification of the Morven Site, the Applicant has since defined the area for development, separating the Morven Site into Morven North and Morven South. Morven South will be subject to separate consent applications and its own suite of documents, including a separate EIA Report.

1.3.1.6 Morven North will be located approximately 61km from the Aberdeenshire coast as described in Volume 1, Chapter 1: Introduction. The Morven North boundary is presented in Figure 3.1 of Volume 1, Chapter 3: Project Description and covers an area of 511.12km^2.

1.3.1.7 The key components of Morven North will include the following:

- Up to 96 wind turbines (each comprising a tower section, nacelle, hub and three rotor blades) and associated support structures and foundations;
- Up to five OSPs and associated support structures and foundations including;
  - Up to four High Voltage Alternating Current (HVAC) collector substation platforms;
  - Up to one High Voltage Direct Current (HVDC) convertor substation (this could be a single platform or two platforms linked by a bridge);
- Scour protection for wind turbine and OSP foundations;
- A network of inter-array cabling linking the individual wind turbines to each other and to the OSPs, plus interconnector cables connecting OSPs to each other (approximately 424km of inter-array cabling and 484km of interconnector cabling).

1.3.1.8 A full Project Description can be found in Volume 1, Chapter 3: Project Description of the EIA Report.

1.3.2 Pre-Application

1.3.2.1 The Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013 apply whenever an activity is planned within the Scottish Territorial Seas (0 to 12nm). However, these requirements are not applicable in respect of relevant applications in the Scottish Offshore Region (12nm to 200nm) due to their being no provision for statutory Pre-Application Consultation (PAC) in the MCAA 2009, 2009, as is the case for Morven North.

1.3.2.2 Extensive pre-application and pre-scoping consultation has been undertaken for Morven North with statutory consultees, key stakeholders and industry bodies throughout the development of the project. Engagement has been led primarily with MD-LOT, NatureScot, relevant local authorities, Natural England (where applicable), and sectoral stakeholders including commercial fisheries organisations, navigation and shipping bodies, aviation consultees and environmental NGOs. Consultation has been iterative and topic-specific, covering the scope and methodology of the EIA and Habitats Regulations Appraisal (HRA), cumulative and in-combination assessment approaches, and the proposed consenting strategy, as relevant, including the division of the original Morven Site into Morven North and Morven South. Consultees' advice has directly informed project design, assessment methodologies, topic scoping decisions, cumulative assessment scenarios and the development of mitigation and management measures. The outcomes of this engagement are documented within the Consultation Annex (Volume 3, Annex 5.1: Consultation, of the EIA Report).

1.3.3 Submission (S36 & marine licence)

1.3.3.1 Applications for Morven North are to be submitted under Section 36 of the Electricity Act 1989 (as amended) alongside an application for marine licences under the MCAA 2009.

1.3.3.2 Morven North is a generating station with a capacity of greater than 50MW located in Scottish Offshore Waters (between 12nm to 200nm) and therefore it requires the following consent and licences:

- a Section 36 Consent under the Electricity Act 1989 for the offshore generating station located within the Morven North Boundary;
- a marine licence for the Morven North generating station (wind turbines, foundation and inter-array cables) under the MCAA 2009;
- a marine licence for the Morven North OSP infrastructure (OSPs, OSP foundations and interconnector cables within the Morven North Boundary) under the MCAA 2009.

1.3.3.3 The Applicant has opened discussions with MD-LOT in relation to the commencement of development condition that would be included in any awarded Section 36 Consent. As standard, historically this condition enforces a 5-year validity period from consent award to commencement of development. In the context of the Morven Programme, flexibility is being sought for both grid connections due to uncertainty on grid connection dates and the sequence of delivery of Morven North and Morven South. It is currently the case that there is a significant risk of not commencing development within this consent validity period for Morven North. Therefore, to avoid undue cost or complication (and therefore delay to delivering low carbon generation capacity) the Applicant is seeking to establish a viable solution pathway, being a longer validity period, in advance of issues arising. In pre-application consultation with MD-LOT the Applicant was instructed to highlight the need for a longer validity period in the application for Section 36 Consent, along with a clear justification as to why this is the case. Set out below are the circumstances which render the 5-year validity period likely to be insufficient due to factors not entirely within the Applicant's control. Acting as a prudent developer and in line with Crown Estate Scotland's clear guidance which rewarded developers at lease for progressing surveys early, the Applicant began baseline aerial survey work in January 2021, before the point of lease award. Aerial surveys continued monthly until September 2023.

- This survey data has a validity period of 5 years (as advised by NatureScot), meaning the validity of the baseline data collected expires in September/October 2026 (to ensure 2 years of aerial survey data within this data validity period), requiring the Applicant to submit consent applications ahead of this date. Delaying submission would necessitate re-conducting surveys which would incur extensive and unnecessary additional costs.
- The current trajectory anticipates a Section 36 Consent decision for Morven North by May 2027 (assuming a 12-month determination). If consent is awarded this would set a consent validity expiry date of mid-2032 (5 years on from consent determinations) – meaning the Applicant would be required to commence construction by this point or forfeit consent.
- This presents an unworkable scenario. The Applicant has been involved in both Holistic Network Design (HND) and HND Follow Up Exercise (FUE) connection processes and continues to face extended uncertainty and delay regarding grid connection. As part of the ongoing Connections Reform process, National Energy System Operator (NESO) has informed the Applicant that Morven North has been prioritised as a Gate 2 Phase 2 project, with a connection window currently anticipated to be between 2031 and 2035 inclusive. However, NESO currently (NESO, 2025) propose to advise the Applicant of its firm connection date for Morven North only by early 2027 (after consent applications will be submitted). This means at present the Applicant does not have a firm connection date for Morven North. The same is true for Morven South.
- In addition, the Applicant is dependent on High Voltage Direct Current (HVDC) transmission equipment which is experiencing at least 6 years' lead time from point of order due to anticipated supply chain constraints. This includes, but is not limited to, high demand and limited available competition. This consolidates the risk associated with commencing construction in mid-2032 to remain compliant with the standard 5-year consent validity period.
- Grid connection dates and HVDC are both critical to delivery of Morven North and are variables which are not within the control of the Applicant.

1.3.3.4 The Applicant therefore considers that the five-year commencement of construction validity period, routinely attached to offshore wind farm consents, would likely not be sufficient. Based on its current understanding of its grid connection window and current procurement timelines, the Applicant considers that an appropriate period of consent validity would be ten years from the date of consent. It is possible that Morven North could connect to either Hawthorn Pit or Branxton and therefore could be the first or second project built out across the Morven Site, subject to grid connection dates. A

ten-year period of consent validity would therefore allow the Applicant to continue to bring Morven North forward if Morven South was prioritised for delivery to maximise the decarbonisation benefit deliverable from the Morven Site given the potential grid connection dates and arrangements, and intensifying HVDC procurement conditions.

1.3.4 Site description

1.3.4.1 Morven North is located in the central North Sea, approximately 61 km offshore from the Aberdeenshire coast, within an area identified through the ScotWind leasing process as suitable for offshore wind development. Morven North is situated wholly within Scottish Offshore Waters and occupies a defined offshore development boundary of approximately 511.1 km². Morven North forms part of the wider Morven Option Lease Agreement Site awarded the Applicant, which has subsequently been refined into two distinct and separately consented projects: Morven North and Morven South.

1.3.4.2 The Morven North Boundary lies entirely offshore and comprises marine waters with water depths ranging from approximately 62 m to 75 m relative to Lowest Astronomical Tide. The seabed within the Morven North Boundary is characterised predominantly by deep circalittoral sand, with localised areas of deep circalittoral coarse sediment. Overall seabed conditions are generally flat, with the presence of shoals and small channels. These characteristics have been confirmed through site-specific geophysical and benthic surveys undertaken as part of Morven North's development. The identified seabed and bathymetric conditions are considered suitable for the installation of offshore wind infrastructure using a range of established foundation solutions.

1.3.4.3 Morven North would comprise up to 96 offshore wind turbines, associated foundations, offshore substation platforms and a network of inter-array and interconnector cables, all located within the defined Morven North Boundary. Morven North has been developed using a Project Design Envelope (PDE) approach, providing flexibility in final layout, technology selection and construction methodologies while ensuring that the maximum potential environmental effects have been robustly assessed through the Environmental Impact Assessment process. Export cables and onshore infrastructure are subject to separate consent applications and do not form part of the Morven North Offshore Wind Array Project.

1.4 Purpose of the Planning Statement and Needs Case

1.4.1.1 This Planning and Need Statement accompanies an application seeking consent for Morven North under the aforementioned regimes.

1.4.1.2 This Planning and Need Statement provides an overview of national and international legislation and commitments and considers the policy implications of Morven North taking into account the Marine Planning Framework, including the UK Marine Policy Statement (MPS), Scotland's National Marine Plan (NMP) and SMP-OWE alongside other relevant policy documents. This includes a demonstration of the overall need case for Morven North and the benefits the project will provide.

1.4.1.3 In addition, this Planning and Need Statement also provides a summary of the EIA Report conclusions and a detailed assessment of policy compliance against the relevant offshore policies.

2 Legislative and policy context

2.1 International commitments and actions to address climate change

2.1.1.1 The Paris Agreement (UNFCC, 2016) is a legally binding international treaty on climate change. It was adopted by 196 Parties at the UN Climate Change Conference (COP21) in Paris, France, on 12 December 2015. It entered into force on 04 November 2016.

2.1.1.2 The overarching goal of the Paris Agreement is to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels."

2.1.1.3 While the Paris Agreement itself is not UK or Scottish Government policy, domestic carbon reduction targets and the development of new low carbon electricity generation goes towards meeting the UK's commitment in the Paris Agreement.

2.1.1.4 In October 2018, following the adoption by the UN Framework Convention on Climate Change of the Paris Agreement, the Intergovernmental Panel on Climate Change (IPCC), which is the United Nations body for assessing the science related to climate change, published a Special Report on the impacts of global warming of 1.5°C above pre-industrial levels (IPCC, 2018). This report concluded that human-induced warming had already reached approximately 1°C above pre-industrial levels, and that without a significant and rapid decline in emissions across all sectors, global warming would not be likely to be contained, and therefore more urgent international actions to decarbonise are required.

2.1.1.5 Nationally Determined Contributions (NDCs) are at the heart of the Paris Agreement and the achievement of its long-term goals. NDCs embody efforts by each country to reduce national emissions and adapt to the impacts of climate change. Article 4, Paragraph 2 of the Paris Agreement requires each Party to prepare, communicate, and maintain successive NDCs that it intends to achieve. Parties shall pursue domestic mitigation measures, with the aim of achieving the objectives of such contributions. Updated NDCs were submitted in 2025, detailing countries' intended climate actions through to 2035. Another round of NDCs is expected to be submitted in 2030 for intended climate actions through to 2040.

2.1.1.6 The IPCC Working Group III (IPCC WG3) published its Summary of Climate Change as part of the IPCC's Sixth Assessment Report in April 2022 (IPCC, 2022). The IPCC WG3 report notes that although the rate of growth of average global annual Greenhouse Gas (GHG) emissions was lower between 2010 and 2019 than in the previous decade, average global annual GHG emissions during the last decade were higher than in any previous decade on record.

2.1.1.7 The IPCC WG3's global GHG emissions for four modelled scenarios are included in Figure 2.1. The red band shows global annual GHG emissions considering global decarbonisation policies which at the time of writing the report had been implemented. Implemented policies are likely to slow the historical increase in annual emissions but are not yet sufficient to reduce them. In other words, policies which have already been implemented will keep global GHG emissions continuing at their current level through to 2050, rather than reducing them.

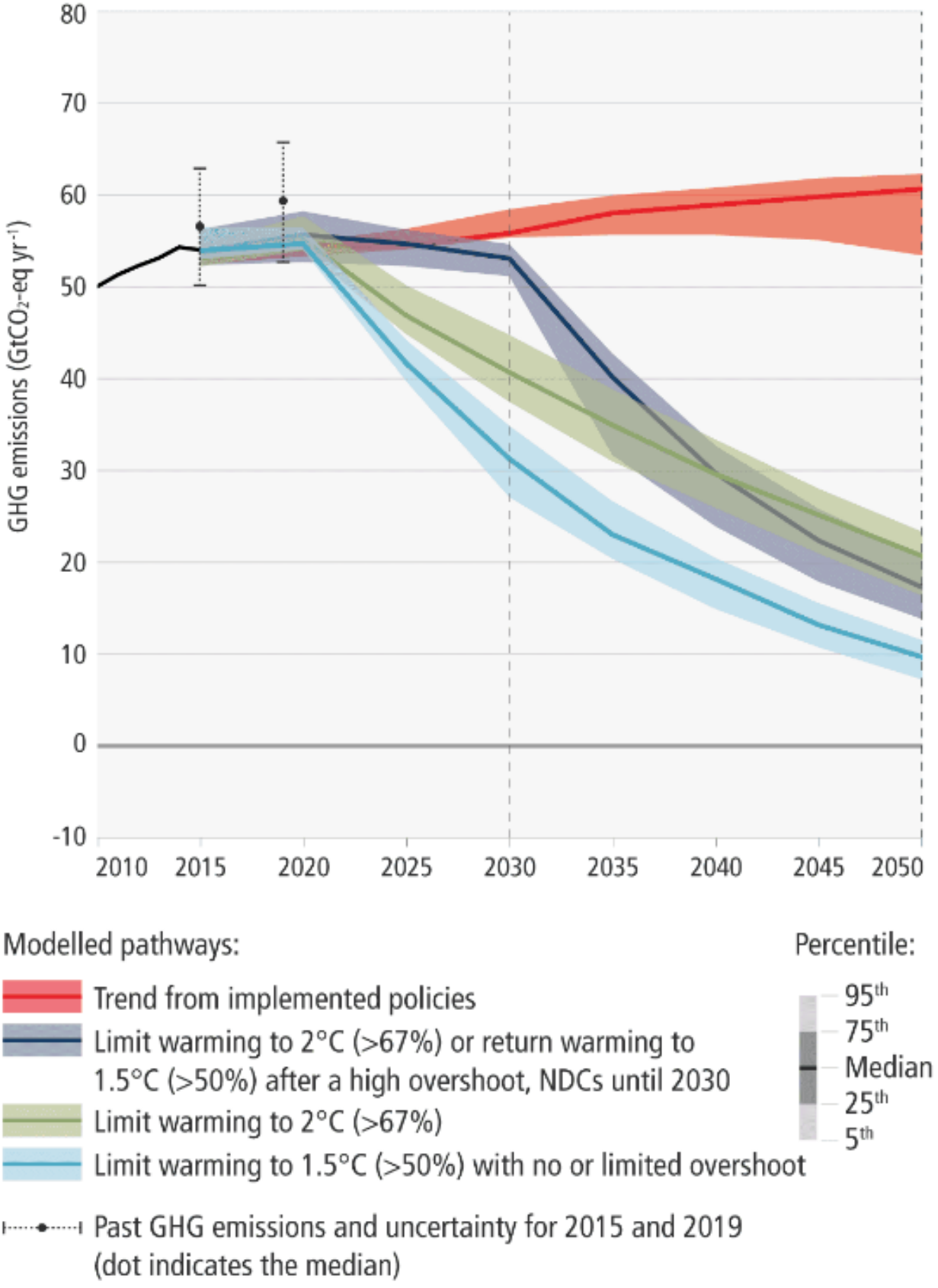

Figure 2.1: Representation of global GHG emissions of modelled pathways (IPCC, 2022, Figure SPM.4)

2.1.1.8 The purple, green, and blue bands show the IPCC's conclusions on different decarbonisation pathways, which must be followed to meet three scenarios of global temperature increases.

2.1.1.9 The purple band shows the decarbonisation path achieved by NDCs to 2030 followed by the decarbonisation path required to limit temperature increase to 2°C above pre-industrial levels with a probability of at least 67%. The red band is higher than the purple band, which implies that policies implemented to date are not sufficient to meet 2030 NDC commitments.

2.1.1.10 The green band shows the decarbonisation path which will achieve the same outcome as the purple path, by increasing actions in the 2020s and overshooting current NDCs. By urgently increasing decarbonisation actions now, future year-on-year carbon reductions to meet the same outcome can be lower and therefore are likely to be more achievable.

2.1.1.11 The cumulative warming effect of carbon means that not delivering against plans set out for the 2020s will lead to a greater scale and urgency to future plans and their delivery in order to meet the temperature increase limit set by the Paris Agreement. Delaying decarbonisation actions increases the risk of losing the fight against climate change, while in the meantime ongoing climate change events and impacts are unlikely to slow or decrease, putting lives and livelihoods at risk.

2.1.1.12 The blue band shows the decarbonisation path which will meet the commitments of the Paris Agreement with a probability of 50%.

2.1.1.13 Conclusions arising from Figure 2.1 are:

- global climate change commitments are not yet sufficient to meet nor sustain a (likely) successful track towards containing global temperature rise below 1.5°C;
- policies implemented to date fall short even of those commitments;
- the delivery of measures will be required beyond 2030 to ensure that the 2050 target is met and sustained.

2.1.1.14 The IPCC WG3 report findings also imply that mitigation after 2030 can no longer establish a pathway which will likely not exceed 1.5°C global temperature increase versus 1990, during the 21st Century.

2.1.1.15 The compelling need for global action to decarbonise continued to be reinforced through the IPCC's 20 March 2023 publication of its 2023 assessment of global climate change (IPCC, 2023). The report concludes that the world is likely to pass a dangerous temperature threshold within the next 10 years, pushing the planet past the point of catastrophic warming — unless nations drastically transform their economies and immediately transition away from fossil fuels.

2.1.1.16 The Synthesis Report of the IPCC's Seventh Assessment Report will be produced after the completion of the Working Group reports and released by late 2029.

2.1.1.17 In a June 2024 news report which accompanied the publication of its Global Annual to Decadal Climate Update (2024 to 2028) report, the World Meteorological Organisation (WMO) stated that "There is a 47% likelihood that the global temperature averaged over the entire five-year 2024 to 2028 period will exceed 1.5°C above the pre-industrial era" (WMO, 2024). This implies that sufficient progress on fighting climate change has not yet been made and more needs to be done in both mitigation and adaptation.

2.1.1.18 WMO have published news reports in 2025 (WMO, 2025a-d) which tell of the continuing effects of climate change. They confirm that 2024 was likely the first calendar year with a global mean temperature of more than 1.5°C above the 1850 to 1900 average; report on the extreme weather events experienced in the last year from as far afield as South America and Europe; and confirm that record-setting global temperatures have continued into 2025 despite a (normally cooling) La Niña event.

2.1.1.19 In May 2025 the WMO published their Global Annual to Decadal Climate Update (2025 to 2029) (WMO, 2025e). Although the WMO report states that long-term warming (averaged over decades) currently remains below 1.5°C, they estimate the chance that at least one of the next five years will be more than 1.5°C above the 1850 to 1900 average is over 85%, and the chance that the 5-year average warming for 2025 to 2029 will be more than 1.5 °C is 70%, up from 47% for the period 2024 to 2028 estimated by the WMO in the previous year (WMO, 2024).

2.1.1.20 The 28th Conference of the Parties to the United Nations Framework Convention on Climate Change (COP28) was held in Dubai in December 2023. COP28 achieved agreement among the parties, to the Global Renewables and Energy Efficiency Pledge to "tripling renewables and doubling energy efficiency." On a global basis, COP28 concluded the requirement for action to abolish carbon emissions is more urgent now than it has ever been (UNFCC, 2023a).

2.1.1.21 The UK Government is a signatory to the Global Renewables and Energy Efficiency Pledge (UNFCC, 2023b). In July 2024, the Secretary of State for Energy Security and Net Zero met with past and future COP Presidents to discuss the need for greater urgency in tackling the climate crisis while underlining "the UK's determination to act as a global leader and reliable partner on climate action" and "the importance of the UK's renewed domestic leadership in encouraging ambitious action abroad. Climate and clean energy are at the heart of the new Government's agenda." (DESNZ, 2024).

2.1.1.22 During COP29, which closed in November 2024, all countries were reminded that in 2025 stronger national climate plans (measured through NDCs) become due. The UK delegation clearly signalled at COP29 that the UK plans to ramp up climate actions because delivering these actions will be entirely in the interests of the UK economy and peoples (UNFCC, 2024).

2.1.1.23 In time for the commencement of COP30 in November 2025, the UNFCC reported that, based on NDCs received at the time, estimated total global GHG emissions for 2035 are projected to be around 12 per cent below 2019 levels (UNFCC, 2025). This falls short of the pathway to limit temperature increase to 2°C above pre-industrial levels with a probability of at least 67%, as shown by the purple band in Figure 2 1. Sufficient progress on fighting climate change has not yet been made and more needs to be done in both mitigation and adaptation.

2.1.1.24 In addition, in January 2026 the UK (alongside Europe) signed the Hamburg Declaration (HM Government, 2026), at the North Sea Summit. This historic clean energy security pact intends to deliver major offshore wind projects in shared waters and reaffirms the existing ambition to build 300GW of offshore wind in the North Sea by 2050 (pledged three years ago by North Sea countries). Morven North represents a significant portion of the UK's contribution to this ambition, which emphasises that the need for projects like Morven North will continue post 2030.

2.2 European policy and legislation

2.2.1.1 The UK officially left the European Union (EU) (hereafter referred to as 'EU Exit') on 31 January 2020 after triggering Article 50 of the Lisbon Treaty. Since the EU Exit, the UK Government has maintained environmental commitments made, along with the legislation enacted after the departure of the UK from the EU, according to the European Union (Withdrawal) Act 2018 (HM Government, 2018).

2.2.1.2 The Scottish Government's alignment with EU law is detailed in the UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021 which outlines the Scottish Ministers' ability to make supporting legislation on devolved Scots law (of which environment is included), wherever appropriate, to align with EU law (Scottish Government, 2022a).

2.3 UK policy and legislation

2.3.1 UK commitments to address climate change

2.3.1.1 As a result of its commitments to the Paris Agreement, in June 2019 the UK became the first major economy to legislate for a 2050 Net Zero GHG emissions target through the Climate Change Act

2008 (2050 Target Amendment) Order 2019 (HM Government, 2019). Decarbonisation to Net Zero is therefore a UK legal requirement.

2.3.1.2 The Scottish Government has its own statutory emissions reduction target of achieving Net Zero by 2045. However, Scotland's targets and delivery plans are reflected in the UK's international climate change commitments. As such, Scotland is a critical contributor to the achievement of the wider UK's NDC commitments. Indeed, any progress made in Scotland towards its targets also contributes to achieving UK-wide targets.

2.3.1.3 In October 2024, the Climate Change Committee (CCC), a national independent advisory committee, provided advice to the Government for the UK to strengthen it's 2035 NDC commitment to reduce GHG emissions by 81% from 1990 to 2035. On 12 November 2024 at COP29, the Prime Minister announced the UK's ambitious and credible NDC target to reduce all GHG emissions by at least 81% by 2035, compared to 1990 levels (excluding international aviation and shipping emissions). The 81% reduction is consistent with the ambition legislated in the Sixth Carbon Budget but was updated to include international aviation and shipping emissions and for a change in accounting methodology (CCC, 2024a).

2.3.1.4 The UK Government's objectives are to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding GHG emissions including the NDC.

2.3.1.5 The CCC made clear in its most recent Progress Report to Parliament in 2025 (CCC, 2025) that the UK is not on track to meet its fifth (2028 to 2032) or sixth (2033 to 2037) carbon budget commitments:

"Credible plans are in place to overachieve the Fourth Carbon Budget (CB4), as required to be on a sensible path to Net Zero. Plans that are either credible or have some risks attached cover three-fifths of the emissions reductions required to meet the UK's 2030 NDC and the Sixth Carbon Budget (CB6). But there remain significant areas in which plans are currently insufficient" (CCC, 2025), p18.

And

"To achieve the Government's ambition in the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more than double by 2030 … 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 this decade" (CCC, 2025), p15.

2.3.1.6 Emissions in the UK have steadily fallen over the last three decades and the UK met its first three carbon budgets covering the period 2008 to 2022 (CCC, 2025), p18. In 2024 emissions were 50.4% below 1990 levels according to provisional estimates (CCC, 2025), p24.

2.3.1.7 In February 2025 the CCC published their proposal for a Seventh Carbon Budget (CB7) covering 2038 to 2042. The CCC's proposal is for UK emissions to fall to 87% below 1990 levels (CCC, 2025a), p60).

2.3.1.8 Figure 2.2 shows historical emissions and performance against historical Carbon Budgets. The CCC's Carbon Budget Delivery Plan (CBDP, yellow line) for Carbon Budgets CB4, CB5, CB6 and CB7 (2038-2042) are also shown, as are the UK's NDCs for 2030 and 2035 (black bars).

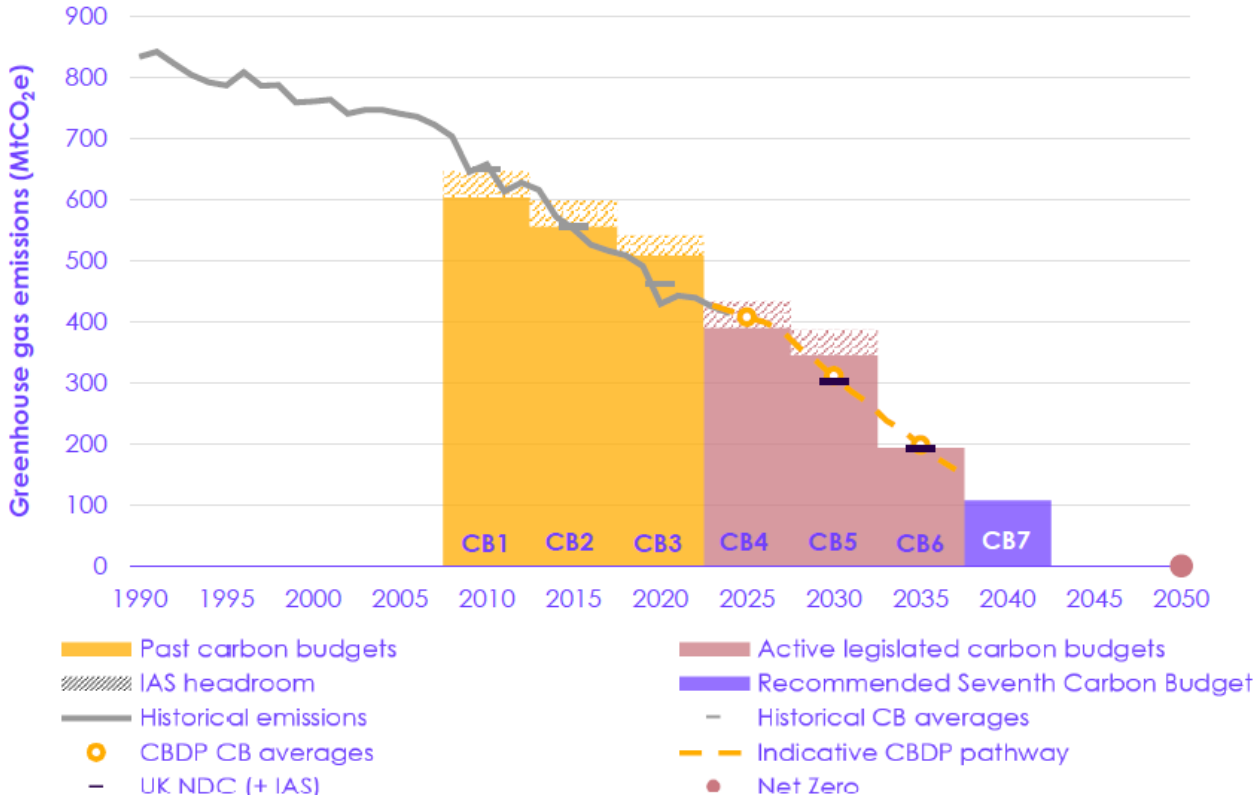

Figure 2.2: UK historical emissions, the CBDP indicative pathway and the UK's targets (CCC, 2025), Figure 1.1

2.3.1.9 The reduction in carbon emissions required from CB5 to achieve CB6 is significant, as is the next reduction to achieve CB7. Historically, the UK's NDCs and Carbon Budgets have tracked comparable levels of increasing ambition in carbon reductions. NDCs and Carbon Budgets for 2040 and beyond are expected to continue to do the same, pointing to a need to continue to increase low carbon electricity generation and other measures through the decades ahead.

2.3.1.10 In relation to the CB6, the CCC explained that "UK climate targets cannot be met without strong policy action across Scotland, Wales and Northern Ireland" (CCC, 2020a), p23. Although the main policy levers to achieve CB6 commitments are held by the UK Government, CB6 also clarifies that UK climate targets cannot be met without strong policy action in Scotland and that Scotland can take action through complementary measures such as supporting planning and consenting.

2.3.1.11 The delivery of new low carbon electricity generation beyond 2030 is essential for progress to towards the Government's 2050 Net Zero legally binding target to continue to be made. "As with the Fourth Carbon Budget, the Fifth Carbon Budget will need to be overperformed to be on a sensible pathway to Net Zero" (CCC, 2025), p76. Morven North will meet the urgent need for new low carbon generation to be brought online to contribute towards meeting Government's 2050 target.

2.3.1.12 The CCC concluded that the main carbon emission reductions in 2024 were from the electricity supply and industry sectors. Surface transport sector emissions also reduced however emissions from residential buildings increased year-on-year. Electricity supply emissions reduced with the total phase out of coal now complete, and with imports reducing UK gas generation. "An increase in renewable generation capacity … should increase displacement of fossil generation by renewables, which is required to continue the reduction of emissions from electricity supply" (CCC, 2025), p30. The annual carbon emissions reduction required to meet the UK's 2030 NDC increased year-on-year to 19 MtCO2e per year (2025 to 2030) and the CCC conclude that this pace must then be maintained over the Sixth Carbon Budget period. The average annual rate over the previous eight years was only 13.4 MtCO2e per year.

2.3.1.13 The CCC conclude that “This will increasingly require focus on transport, buildings, agriculture, and aviation” (CCC, 2025), p22. The decarbonisation of non-electricity demand is essential to reach Net Zero. However, it is reliant on the availability of sufficient quantities of low carbon electricity as a source of energy to substitute for carbon-emitting fuels currently used within those sectors.

2.3.1.14 Therefore, the development of new low carbon electricity generation infrastructure must also accelerate. Without adequate supply of low carbon electricity, the urgent requirement for a rapid decarbonisation of other sectors (as will be required to meet future Carbon Budgets) is unlikely to be achieved.

2.3.1.15 The UK’s strategic plan for decarbonisation is to largely decarbonise its power sector by adopting low carbon sources quickly and invite industry to bring forward new low carbon developments to meet the twin challenge of energy security and climate change (DESNZ, 2025), Para 4.2.2.

2.3.1.16 Implementing this strategy by closing generation capacity with high carbon emissions and replacing it with low carbon renewable energy has delivered significant decarbonisation benefits in the UK to date.

2.3.1.17 Figure 2-3 shows that carbon emissions associated with the use of electricity in the UK (green dashed line) have reduced by approximately 75% between 2005 and 2023 (the most recent year for which data is available from this source). Non-electrical emissions have also reduced but by only approximately one-half of electricity emissions (35%).

2.3.1.18 The transport and domestic sectors had the highest carbon emissions in 2023. Fossil fuels remain a major source of energy to these sectors. Critically the percentage reductions of emissions in those sectors between 2005 and 2023 were significantly lower than national average emission reductions, at 19% and 51% respectively. Emissions from the domestic sector had also reduced by just 36% when measured excluding reductions in emissions from electricity.

2.3.1.19 Figure 2.3 suggests that the transport, domestic, and industrial sectors require a significant intervention to reduce carbon emissions, and that the reduction of emissions from those sectors will be critical if Net Zero 2050 is to be reached.

2.3.1.20 The Government’s strategy to reduce these emissions is to increase low carbon electricity supplies such that electricity may be used to reduce fossil fuel usage from those other sectors. The continued delivery of low carbon electricity generation facilities beyond 2030 is therefore necessary to reduce emissions from those sectors.

2.3.1.21 Indeed, the Government's Carbon Budget and Growth Delivery Plan (UK Government, 2025) clarifies that to deliver the Government's Carbon Budgets, 63% of the total projected electricity generation required in 2035 must by 2030 already be supplied from low carbon sources, rising to 98% in 2035. This underscores the importance of delivering the Clean Power target and sustaining a clean power system beyond 2030 to ensure that carbon emissions from all sectors continue to reduce.

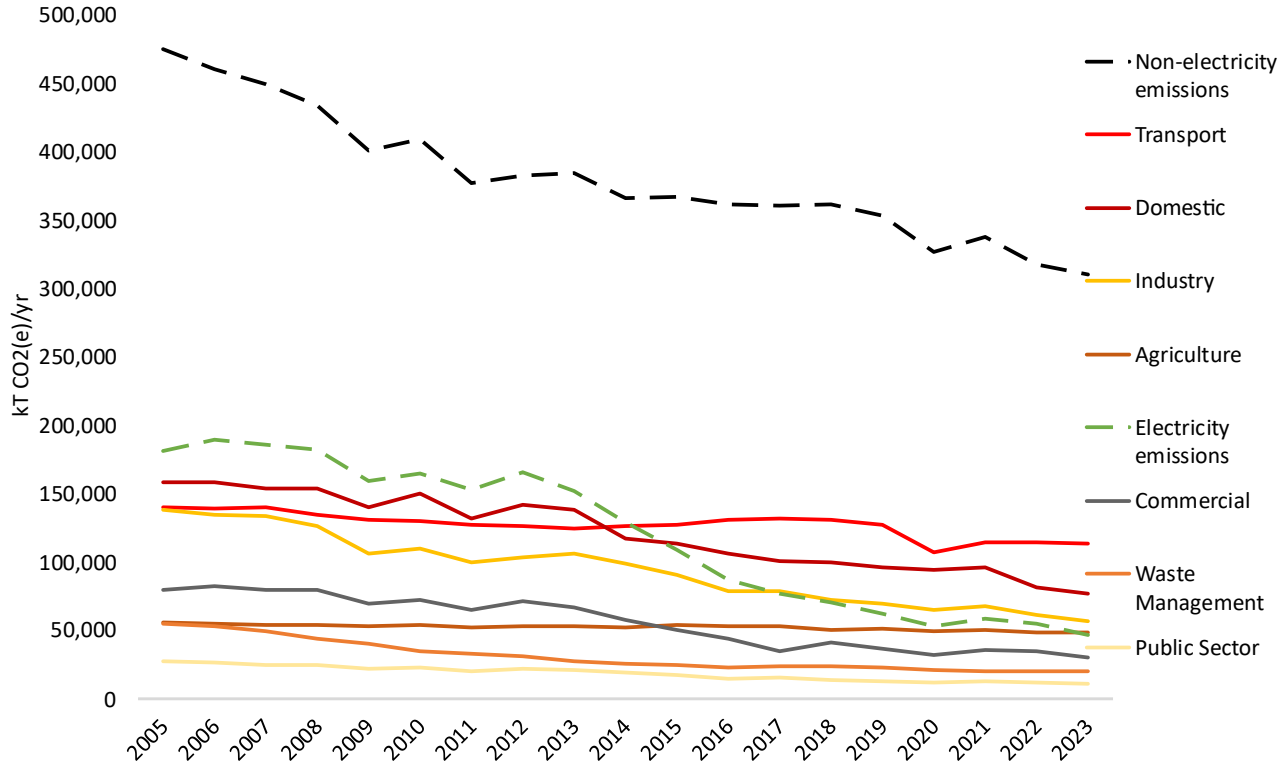

Figure 2.3: National (United Kingdom) Greenhouse Gas emissions 2005 to 2023 (LULUCF net benefits small and not shown) (DESNZ, 2025d)

2.3.2 United Kingdom energy strategy and the Clean Power target

Relevance of United Kingdom energy and planning policy to Morven North

2.3.2.1 The international policy framework is important to support the need case for significant capacities of new low carbon energy. However, it is the UK and Scottish climate change, renewables and marine policies that are the most relevant elements of the overall framework under which to assess and determine Morven North.

2.3.2.2 Scottish Ministers are responsible for the licensing and consenting of offshore wind projects. However, the Global Climate Emergency and energy pressure ensures that UK-wide energy policy including decarbonisation, energy security and affordability, although a matter reserved to UK Ministers, is a crucial consideration for Scottish Ministers in the exercise of their functions.

2.3.2.3 The UK's National Policy Statement for Energy (NPS EN-1) applies to large-scale renewable developments in England and Wales. However, NPS EN-1 states, at Para 1.4.2, that "energy policy is generally a matter reserved to UK Ministers and this NPS may therefore be a relevant consideration in planning decisions in Wales, Northern Ireland and Scotland" (DESNZ, 2025).

2.3.2.4 EN-1 notes that the provision of nationally significant low carbon infrastructure, which includes offshore wind, is a Critical National Priority ("CNP") for the UK Government and further that energy security and decarbonising the power sector to combat climate change are "capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs [Habitats Regulations Assessments] … for CNP Infrastructure" (DESNZ, 2025), Para 4.2.34.

2.3.2.5 This is consistent with the April 2024 Scottish Ministers considerations in their Derogation Report (under the Conservation (Natural Habitats & C) Regulations 1994 and the Conservation of Marine Habitats and Species Regulations 2017) for the Green Volt floating offshore wind project. (Marine Directorate).

2.3.2.6 Further, the Scottish Minister's 2025 Decision Notice for Section 36 Consent for Berwick Bank Offshore Wind Farm also indicates at Paragraph 8.4.7 that:

"The Scottish Ministers have also had due regard to the UK Government's Overarching National Policy Statement for energy (EN-1), published in January 2024, and its National Policy Statement for renewable energy infrastructure (EN-3), published in November 2023. These policies provide a framework for delivering the UK's international commitments on climate change. The Scottish Ministers have taken particular account of EN-1's identification of nationally significant low carbon infrastructure (which includes offshore wind) as a critical national priority and the overarching need for energy security and decarbonising the power sector to combat climate change" (Scottish Ministers, 2025).

2.3.2.7 Therefore, the Applicant considers that NPS EN-1 is a relevant material consideration in the determination of this application for Section 36 Consent.

Clean Power 2030 Action Plan

2.3.2.8 In December 2024, the Prime Minister reconfirmed the Government's mission to make Britain a clean energy superpower and Government published their Clean Power 2030 Action Plan, herein called the Clean Power Plan (UK Government, 2024). This plan took onboard advice from the NESO to achieve "at least 95% clean power by 2030, while accelerating the UK to Net Zero" (HM Government, 2025c), p6 thereby staying on track to "secure our energy supply with home-grown, clean power" (HM Government, 2025c), p40.

2.3.2.9 The urgency of the need to implement measures which deliver decarbonisation has increased in recent years and the UK Government has explained that achieving and sustaining a Clean Power system is of critical importance.

2.3.2.10 The UK Government has defined its Clean Power target to mean that, in a typical weather year:

- Clean sources produce at least as much power as Great Britain (GB) consumes in total (UK Government, 2024), p25. In 2025, clean sources produced 64% of GB consumption (UK Government, 2026b);
- Clean sources produce at least 95% of Great Britain's generation (UK Government, 2024), p25. In 2025, clean sources produced 73% of GB generation (UK Government, 2026b).

2.3.2.11 The Clean Power Plan delivers a mechanism to prioritise near term actions to achieve the Clean Power target and recognises the need to keep power clean beyond 2030. Therefore, the continued delivery of low carbon generation facilities beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. The Clean Power Plan therefore seeks projects which aim to connect before 2030 as well as projects which aim to connect in the 2030s.

2.3.2.12 In March 2020, the Energy System Catapult's Innovating to Net Zero report observed that: "Net Zero narrows the set of viable pathways for the future energy system. Where an 80% target allowed considerable variation in relative effort across the economy, with some fossil fuels still permissible in most sectors, Net Zero leaves little slack." (ESC, 2020), p5.

2.3.2.13 It is therefore unsurprising that although the Clean Power Plan does not explicitly define which technologies constitute Clean Sources, the plan does look to offshore wind to provide a majority share of the UK's future clean energy sources. The Clean Power Plan proposes switching from fossil fuelled generation to "clean energy from renewables … complement[ed with] flexible capacity [i.e. batteries and/or residential flexibility], low carbon flexible capacity technologies like long duration electricity storage, power carbon capture, usage and storage (CCUS)" as well as hydrogen to power and nuclear generation. (UK Government, 2024) pp23 & 29.

2.3.2.14 The Clean Power Plan explains the need for a rapid expansion in the UK's low carbon electricity generation capacity and sets out the actions the Government proposes to take to deliver that capacity against the timeframes required. Achieving the Clean Power target is a necessary step in the UK's journey to achieving its energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering Net Zero carbon emissions by 2050.

2.3.2.15 The Clean Power Plan reiterates the energy security and affordability benefits of pursuing a low carbon future: "In an era of heightened geopolitical risk, switching fossil fuelled generation for home-grown clean energy from renewables and other clean technologies offers us security that fossil fuels simply cannot provide … It is crucial we complement renewables with flexible capacity to ensure we can deliver clean power no matter the weather" (UK Government, 2024), p21.

2.3.2.16 Advice provided by NESO to the Government demonstrates that to achieve 'Clean Power by 2030', "offshore wind, onshore wind, solar, batteries [and other key supply technologies] will all need to deploy more on average each year to 2030 than they have ever done in a single year before. This will inevitably stretch supply chains and require accelerated decision making in planning, permitting and awarding of contracts" (NESO, 2024a), p9.

2.3.2.17 NESO conclude that "to manage delivery risk, there is a high value in pursuing multiple options where they exist and encouraging competition between, not just within, different technologies" (NESO, 2024a), p7, recommending 'aiming high' on the deployment of critical technologies in any pathway to achieve the Clean Power target to reduce the risk of under delivery as a whole and also to reduce reliance on any single project (NESO, 2024a), p49.

2.3.2.18 NESO anticipate that although "Inevitably, some areas will underdeliver … most investments are low regret, and the risk of over-building is low, given the need to meet growing electricity demand through the 2030s" (NESO, 2024a), p6.

2.3.2.19 The Clean Power Plan also paves the way for new strategic plans for development of the GB energy system. NESO has been tasked with developing a national level Strategic Spatial Energy Plan (SSEP), a Centralised Strategic Network Plan (CSNP), and eleven Regional Energy Strategic Plans (RESPs). Ofgem approved NESO's methodology for developing the SSEP in May 2025. Once approved, the SSEP itself will inform the requirements of the transmission network set out in the first CSNP and RESPs.

2.3.2.20 Together these plans will provide a "blueprint of energy requirements, setting out how energy needs will change, what this means for infrastructure needs and indicating critical areas for strategic investment" (Ofgem, 2025). These plans will proceed through a process of review and consultation prior to being finalised and coming into effect in or around 2027.

2.3.2.21 To meet the Clean Power target, the Clean Power Plan recognises the important role that projects in Scotland will play and emphasises the need to capitalise on projects that are already in the planning system and are able to commence operation both before 2030 and during the 2030s. (UK Government, 2024), p10.

2.3.2.22 A key enabler of achieving the Clean Power target, is therefore a "connections queue … formed of ready to connect projects that align with the Government's plan for clean power" (NESO, 2024a), p10. Such a queue would help NESO speed up the "critical and challenging" delivery of essential strategic transmission infrastructure needed to achieve and maintain the Clean Power target (NESO, 2024a), p34.

2.3.2.23 It is also important to continue to bring forward schemes in the event that the Clean Power target is not achieved by 2030, as is also foreseen by flexibility included in the future capacity ranges set out in Government's plan. Government also aims to deliver above the Clean Power ambitions "where the system and consumer benefits align so that potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere" (UK Government, 2024), p25.

2.3.2.24 Table 2.1 sets out Government's 'Clean Power Capacity Range' compared to its December 2024 view(based on Q2 2024 data) of installed capacity (GW) for major generation technologies. These are national pathway figures for the capacity of all technologies which should be prioritised to deliver and sustain Clean Power. 1GW = 1,000MW (one thousand megawatts). For comparison, in 2024 the total installed generation capacity in GBwas approximately 120GW.

Table 2.1: Department for Energy Security and Net Zero 'Clean Power Capacity Range', and current installed capacity (Gigawatt)

(UK Government, 2024), Table 1 & Connections Reform Annex (updated), Table 1)

Technology	Current Installed Capacity (*)	DESNZ 2030 'Clean Power Capacity Range'	2035 FES-derived Capacity Range (**)
Offshore wind	14.8	43 – 50	72 – 89
Onshore wind	14.2	27 – 29	35 – 37
Solar	16.6	45 – 47	45 – 69
Nuclear	5.9	3 – 4	4 – 6
Low carbon dispatchable power	4.3	2 – 7	up to 25
Unabated gas	35.6	35	N/A
Batteries	4.55	23 – 27	24 – 29
Other flexible assets	15.25	26 – 32	51 – 63

(*) Government's view of the publicly available data for GBat the point of publication of the Clean Power Plan

(**) Section 2.4.11 of this Statement provides a description of NESO's Future Energy Scenarios (FES)

2.3.2.25 Government's 2030 Clean Power Capacity Range for offshore wind is 43GW to 50GW. The 2035 FES-derived capacity range for offshore wind is 72GW to 89GW. The FES-derived ranges "Do not constitute a Government pathway, but rather an established, public basis through which to provide longer term certainty on connections" (UK Government, 2024), Connections Reform Annex (updated), p6.

2.3.2.26 Critically, the Clean Power Plan does not seek to limit, constrain or cap the capacity of low carbon generation assets which will be delivered over the coming years. Indeed, quite the opposite is true. The Clean Power Plan seeks to ensure that a sufficient capacity of low carbon generation assets is able to connect within suitable timeframes by de-cluttering the front end of the connection queue while establishing a robust pipeline of projects for later delivery date.

2.3.2.27 Therefore, "Whilst the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained" (UK Government, 2024), p31.

2.3.2.28 The Clean Power Plan does not currently include capacity ranges beyond 2035. However, NESO's Future Energy Scenarios (FES, 2025) which informed the setting of the established Clean Power capacity ranges, includes Net Zero compatible pathways with 92GW to 94GW of operational installed offshore wind capacity in 2040, an increase of up to 22GW on the 2035 FES-derived capacity range.

2.3.2.29 A continued ambition to increase installed offshore wind generation capacity is important because connection queues experience attrition, requiring other new capacity to come forwards to fill any gaps created. Further, it also ensures commercial competition between projects at critical stages of project delivery. To ensure that a sufficient capacity of low carbon generation assets may become operational, a greater capacity of low carbon generation assets is required to come forward at earlier stages of development.

2.3.2.30 The Government is "expecting an increase in planning applications with the Clean Power 2030 target" (UK Government, 2024), p55, and planning applications will need to continue to be made for the Clean Power target to continue to be met. Section 5.6 provides more information on pipeline attrition in the UK.

2.3.3 National Policy Statements EN-1 and EN-3

2.3.3.1 The Applicant considers that the NPS EN-1 (DESNZ, 2025) is a relevant consideration in the determination of this application for Section 36 Consent. This is consistent with the Scottish Minister's considerations within their consent decision reports for both the Green Volt floating offshore wind scheme (Marine Directorate) and for the Berwick Bank fixed bottom offshore wind scheme (Scottish Ministers, 2025).

2.3.3.2 The fundamental need for the large-scale infrastructure which NPS EN-1 considers, recognises the UK's established policy direction to develop an integrated energy system which relies on low carbon electricity generation for a significant proportion of its supply to meet the UK's legal commitment to decarbonise to Net Zero by 2050. The NPS states that:

"Reducing emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity." (DESNZ, 2025), Para 2.3.7.

2.3.3.3 The stated policy objectives for the energy system are "to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to Net Zero by 2050" (DESNZ, 2025), Para 2.3.3). To meet these objectives will require a dramatic increase in the volume of energy supplied from low carbon sources (DESNZ, 2025), Para 2.3.4.

2.3.3.4 Therefore, NPS EN-1 states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (DESNZ, 2025), Paras 3.2.8 to 3.2.10.

2.3.3.5 No single type of electricity infrastructure will be able to meet any of the UK Government's objectives in isolation, and UK Government analysis has concluded that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (DESNZ, 2025), Para 3.3.23.

2.3.3.6 The UK Government's national energy security and Net Zero ambitions will only be delivered through the development of new low carbon sources of energy at speed and scale (DESNZ, 2025), Para 4.2.2. Therefore, there is a CNP for the provision of nationally significant low carbon infrastructure to deliver Clean Power and Net Zero (DESNZ, 2025), Para 4.2.16.

2.3.3.7 Large-scale offshore wind generation is classified as CNP Infrastructure under NPS EN-1, and "For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases" (DESNZ, 2025), Para 4.1.7.

2.3.3.8 Morven North meets the definition of CNP Infrastructure because it is for the development of greater than 100MW capacity of a low carbon source of energy. As CNP Infrastructure, the urgent need for Morven North to assist in achieving the UK's energy objectives, together with the national security, economic, commercial, and Net Zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy (DESNZ, 2025), Para 3.3.63.

2.3.3.9 NPS EN-1 also explains the Secretary of State's approach to HRA derogations:

"Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK National Site Network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations … starting from the position that energy security and decarbonising the power sector to combat climate change:

- requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity … Therefore, the fact that there are other potential plans or projects deliverable in different locations to meet the need for CNP Infrastructure is unlikely to be treated as an alternative solution … Further, the existence of another way of developing the proposed plan or project which results in a significantly lower generation capacity is unlikely to meet the objectives and therefore be treated as an alternative solution; and
- are capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs …" (DESNZ, 2025), Paras 4.2.34.

2.3.4 Mechanisms for supporting new low carbon electricity generation

2.3.4.1 The Contracts for Difference (CfD) scheme is the Government's main mechanism for supporting low carbon electricity generation and was introduced under the Energy Act 2013 to incentivise investment in renewable energy.

2.3.4.2 The benefits of the CfD scheme are that it:

- Provides revenue certainty for investors and allows large-scale infrastructure developments to secure funding and get delivered;
- Pays profits earned through high market prices back to consumer bills.

2.3.4.3 Figure 2.4 provides a simplified pictorial of CfD contract mechanics. During periods when the market price (blue line) is lower than the Strike Price (dotted line), the difference between those prices, shown by the red areas, is collected through consumer bills and paid to the generator.

2.3.4.4 However, during periods when the market price is higher than the Strike Price, the difference shown by the green areas is collected from the generator and redistributed back to consumers.

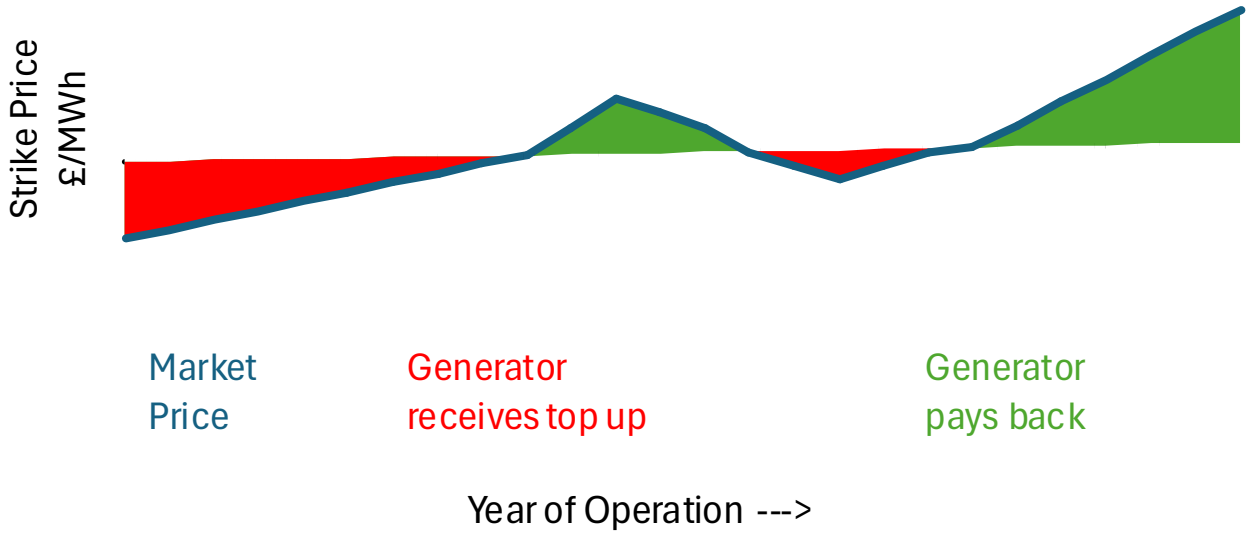

Figure 2.4: Contracts for Difference return excess profits to consumers in return for an agreed contract price

2.3.4.5 Renewable developers with projects located in GBthat meet the eligibility requirements can apply for a CfD for a new build scheme by submitting bids into CfD allocation rounds, in which a range of different renewable technologies compete for contracts.

2.3.4.6 The Low Carbon Contract Company's CfD Register (LCCC) holds data on contract awards to date under the CfD scheme.

2.3.4.7 The results of the latest CfD Allocation Round for offshore wind, AR7, were published in early 2026. The results include 8.4GW of contracted offshore wind capacity (of which 1.5GW is located in Scottish waters), providing evidence to show that the UK Government is committed to delivering its Clean Power Plan. Of the awarded capacity, only 3.2GW intends to be generating by the end of 2030. This provides evidence to show that there is a continuing need for projects to continue to come forwards in the 2030s to deliver Clean Power on the way to Net Zero 2050. AR8 is planned to follow in 2026.

2.3.4.8 System adequacy, meaning the availability of sufficient generation to meet periods of peak demand, is primarily managed through GB's Capacity Market. Capacity Agreements are awarded competitively. Capacity payments are then made to successful generators for being available during periods of system stress.

2.3.4.9 Both new build generators and existing generators may be eligible to apply to the Capacity Market. Flexible technologies such as batteries, pump storage and fossil fuel plants have long been eligible to participate in the Capacity Market. However, eligible schemes must meet emissions-related requirements which have progressively tightened over recent years as the Capacity Market moves to deliver system adequacy and support decarbonisation of the electricity system.

2.3.4.10 Renewable technologies were first included as eligible technologies in the Capacity Market in 2019. The inclusion of wind and solar in the Capacity Market underlines the contribution these technologies can make to system adequacy and system security. However, the Capacity Market is not open to assets which already hold CfD contracts, and vice versa.

2.4 Scottish policy and legislation

2.4.1.1 The challenges associated with climate change, energy supply and security of supply are driving Government policy and decision making on renewable energy developments. As a result, there are a variety of national policies, strategies and regulations relating to climate change and the development of renewable energy in Scotland.

2.4.2 The Scottish Energy Strategy: The future of energy in Scotland (2017)

2.4.2.1 This strategy presented the plan for decarbonising and improving energy infrastructure within Scotland including a 2030 and 2050 vision for Scotland to deliver secure, affordable, clean energy for Scotland's households, communities and businesses (Scottish Government, 2017). In setting out this vision the strategy relies on future delivery of renewable energy with a target of the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources by 2030. Offshore wind is identified as a significant opportunity to achieve this, as further evidenced through the ScotWind Leasing Round and Offshore Wind Sectoral Marine Plan. Also emphasised is the importance of CfD auctions (see Section 2.3.4 of this Statement) for Scottish offshore wind projects and outlines how the same process can be used and expanded upon for future marine energy developments.

2.4.2.2 Section 2.4.7 summarises the 2023 consultation regarding the draft Energy Strategy and Just Transition Plan which, once approved, is proposed to replace the Scottish Energy Strategy.

2.4.3 Scotland declares a Climate Emergency (2019)

2.4.3.1 In April 2019, the First Minister of the Scottish Government declared a climate emergency, which was followed by the UK Parliament declaring a climate emergency, along with an environmental emergency, through an opposition motion in May 2019 (Scottish Government, 2019; UK Parliament, 2019). These announcements demonstrate the UK and Scottish Governments' commitment to tackling climate change, which is further demonstrated through the policies outlined within this Planning and Need Statement.

2.4.3.2 After the United Nations (UN) warned that during the next five years global temperatures were likely to breach the target to limit global warming to less than 1.5°C, the Scottish Government released a statement that Scotland is committed to making steps towards becoming a Net Zero country and working towards a climate resilient future (Scottish Government, 2023a). Offshore wind generation has been identified as being capable of providing a significant contribution towards such commitments.

2.4.4 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

2.4.4.1 The Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emission Reduction Targets) (Scotland) Act 2019, sets out a legally binding target to decrease GHG emissions by 100% from 1990 levels by 2045. The Act relies on the Scottish Ministers and other public entities to ensure that future developments are made sustainably and that low emission options are encouraged. This Act is also in accordance with the Paris Agreement goals of limiting global warming levels to below 2°C, while pursuing efforts to stop them reaching over 1.5°C. The Scottish Emissions Reductions Targets aimed to reduce GHG emissions by at least 75% by 2030, 90% by 2040, and fully to Net Zero by 2045. However, the Scottish Government has since dropped the interim 2030 target, stating that the CCC had advised that the target was beyond their recommendation and is now beyond what can be achieved. The targets of 90% reduction by 2040 and fully Net Zero by 2045 are still being pursued (Scottish Government, 2024a). Further to this, details of the targets and interim steps recommended by the CCC to achieve them are set out within Section 2.4.9 following.

2.4.4.2 A significant expansion of low carbon generation capacity is needed in Scotland both urgently and through the 2030s to achieve this statutory target.

2.4.5 The Update to the Climate Change Plan (2018 to 2032) (2020)

2.4.5.1 The Scottish Government's 2020 Update to the Climate Change Plan covers the period 2018 to 2032. The update recognises that as Scotland transitions to Net Zero, a growing and increasingly decarbonised electricity sector "is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry" (Scottish Government, 2020d), Para 3.1.4.

2.4.5.2 The Climate Change Plan reiterates continued support for renewable energy, including offshore wind, and an ambition for Scotland's electricity system to be largely decarbonised by 2032.

2.4.5.3 The Climate Change Plan states that by 2032 "our electricity system will have deepened its transformation for the better, with over 100% of Scotland's electricity demand being met by renewable sources. More and more households, vehicles, businesses and industrial processes will be powered by renewable electricity, combined with green hydrogen production. There will also be a substantial increase in renewable generation, particularly through new offshore and onshore wind capacity" (Scottish Government, 2020d), p18.

2.4.6 The Offshore Wind Policy Statement (2020) and 2026 update

2.4.6.1 The Offshore Wind Policy Statement (OWPS) (Scottish Government, 2020a) details expectations for offshore wind developments in the future and how they can help the Scottish Government reach its Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 goals.

2.4.6.2 Offshore wind is seen as an integral element in Scotland's contribution towards action on climate change and the OWPS sets out the Scottish Government's ambitions for offshore wind in Scotland, including an ambition (but not a limit) to achieve 8-11GW of offshore wind in Scotland by 2030.

2.4.6.3 The OWPS builds on the renewable energy targets outlined in the Scottish Energy Strategy (Scottish Government, 2017) and the ambition of the OWPS has been reaffirmed in more recent Scottish Government publications.

2.4.6.4 Importantly, on 18 June 2025, Scottish Government launched a consultation to update the Offshore Wind Policy Statement acknowledging that since 2020 there had been considerable change in the policy and planning landscape for offshore renewable energy generation in Scotland and the wider UK, referencing the Clean Power Plan (see Section 2.3.2 of this Statement) as a considerable driver for change.

2.4.6.5 The Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition (Scottish Government, 2026) was published in January 2026 and sets out an increased offshore wind ambition for Scotland. The updated Statement reflects, and underlines, the commitment to delivering the existing project pipeline at scale, including all ScotWind and INTOG projects. This includes a reset of the Scottish Government's offshore wind policy ambition to deliver up to 40GW of new offshore wind capacity by 2040, in addition to the already operational or consented capacity (as of August 2025 at the end of consultation). The updated ambition reaffirms the Scottish Government's commitment to supporting the delivery of the existing project pipeline, clarifies that no further offshore wind leasing rounds are planned in the near term and establishes a clear timetable of 2040, rather than 2035-2040. In addition, a number of additional actions have been committed to in order to realise the full potential of Scotland's offshore wind sector. These include, *inter alia*:

- The publication of an updated SMP-OWE, setting out a sustainable roadmap for offshore wind development in Scottish waters balancing environmental, community and economic needs and supporting delivery;
- Providing a framework in National Marine Plan 2 for the sustainable development of Scotland's marine shared space, in line with the Blue Economy vision and just transition principles;
- Working in partnership with the UK Government to deliver ambitious policy and regulatory reforms, including those in relation to the Habitat Regulations;
- Establish a Scottish Marine Recovery Fund, to deliver a more streamlined and strategic way of securing compensation for adverse environmental effects under the Habitats Regulations;

- Assess the cumulative impacts on fisheries and work with the sector and offshore wind industry to develop practical solutions;
- Streamline the marine licensing and consenting processes;
- Provide targeted support for the Scottish supply chain to maximise opportunities identified through The Crown Estate's Scotland's review of development Supply Chain Development Statement updates; and
- Work with the UK Government and industry on the design and implementation of any Clean Industry Bonus skills-related reforms, ensuring the devolved nature of skills in Scotland is recognised.

2.4.7 The Draft Energy Strategy and Just Transition Plan (2023)

2.4.7.1 On 10 January 2023, the Scottish Government published the draft 'Energy Strategy and Just Transition Plan' for consultation, which will eventually replace the Scottish Energy Strategy (Scottish Government, 2023b). The Draft Strategy and Plan sets out a "clear policy position and a route map of actions with a focus out to 2030 that the Scottish Government will take and the changes that the UK Government must deliver", while establishing a vision that by 2045 "Scotland will have a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy to Scottish households, communities and business". Consultation on the draft Energy Strategy and Just Transition Plan closed in May 2023 with anticipated publication of the final version of the document in late 2024. At the time of writing (May 2026) a final version has not been published

2.4.7.2 The draft strategy signposts the 2020s as a decisive decade in the delivery of an energy system that is consistent with a pathway to achieving Net Zero by 2045, while reducing Scotland's dependence on oil and gas through the development of sufficient, secure and affordable energy sources.

2.4.7.3 The draft strategy sets out Scotland's key future energy ambitions as:

- An increase in renewable generation, both onshore and offshore;
- Accelerated decarbonisation of domestic industry, transport, and heat;
- The generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation outside of Scotland;
- Using Scotland's own resources to deliver energy security.

2.4.7.4 Scotland has already made significant progress in decarbonising its electricity supply: coal generation has closed, and new onshore and offshore renewable generation has opened. Emissions reductions must now be achieved from outside of the electricity sector. The provision of substantial capacities of low carbon electricity generation is critical to this requirement, either to generate electricity as a direct substitute for fossil fuels, or to produce or store low carbon energy (e.g. as hydrogen) which will also reduce fossil fuel demands.

2.4.7.5 Since publication of the Draft Energy Strategy, the scale and pace of action needed to reduce carbon emissions has further increased. Although the 2020s remains a decisive decade, all indications are that the 2030s will need to be even more decisive to ensure a pathway to achieving Scotland's statutory 2045 Net Zero target remains credible and achievable.

2.4.8 CCC Progress in reducing emissions in Scotland (2024)

2.4.8.1 The CCC's Progress in reducing emissions in Scotland report, the 2023 Report to Parliament was published in March 2024 (CCC, 2024b).

2.4.8.2 The report highlighted that Scottish emissions in 2021 missed Scotland's annual legal target, the eighth of twelve legislated annual targets since 2010 and three out of four since 2018 which had been missed.

2.4.8.3 Further, the report noted that the draft Climate Change Plan had not yet been published and therefore that despite several draft publications in circulation, there was no "comprehensive delivery strategy for meeting future emissions targets" (CCC, 2024b), p10.

2.4.8.4 The CCC advised that, among other measures, "By the end of this decade, Scotland will need to: treble the pace of roll-out of public electric vehicle charge points, reduce car traffic by 20%, increase heat pump installation rates by a factor of at least thirteen" (CCC, 2024b), p11.

2.4.8.5 Although "Electricity supply has been the main driver of emissions reduction in Scotland to date … due to the phase out of coal and ramp up of renewables", Scotland still "missed its 2021 annual target of a 51.1% reduction in emissions compared to 1990 levels" (CCC, 2024b), p11. On electricity supply, the CCC recommendation to the Scottish Parliament was that "The Scottish and UK Governments must work together effectively to ensure both the Scottish targets and the UK-wide objective of a decarbonised electricity system by 2035 are achieved". (CCC, 2024b), p18.

2.4.8.6 Figure 2.5 shows that carbon emissions associated with the use of electricity in Scotland (blue dashed line) have reduced by approximately 76% between 2005 and 2023 (the most recent year for which data is available from this source). Non-electrical emissions (black dashed line) have also reduced but by only 27% over the same period.

2.4.8.7 The transport, agriculture and domestic sectors had the highest carbon emissions in Scotland in 2023. Fossil fuels remain a major source of energy to the transport and domestic sectors. Critically the percentage reductions of emissions in those sectors between 2005 and 2023 were lower than national average emission reductions, at 15% and 52% respectively. Emissions from the domestic sector had also reduced by just 32% when measured excluding reductions in emissions from electricity.

2.4.8.8 Figure 2.3 suggests that the transport and domestic, sectors require a significant intervention to reduce carbon emissions, and that the reduction of emissions from those sectors will be critical if Net Zero 2050 is to be reached.

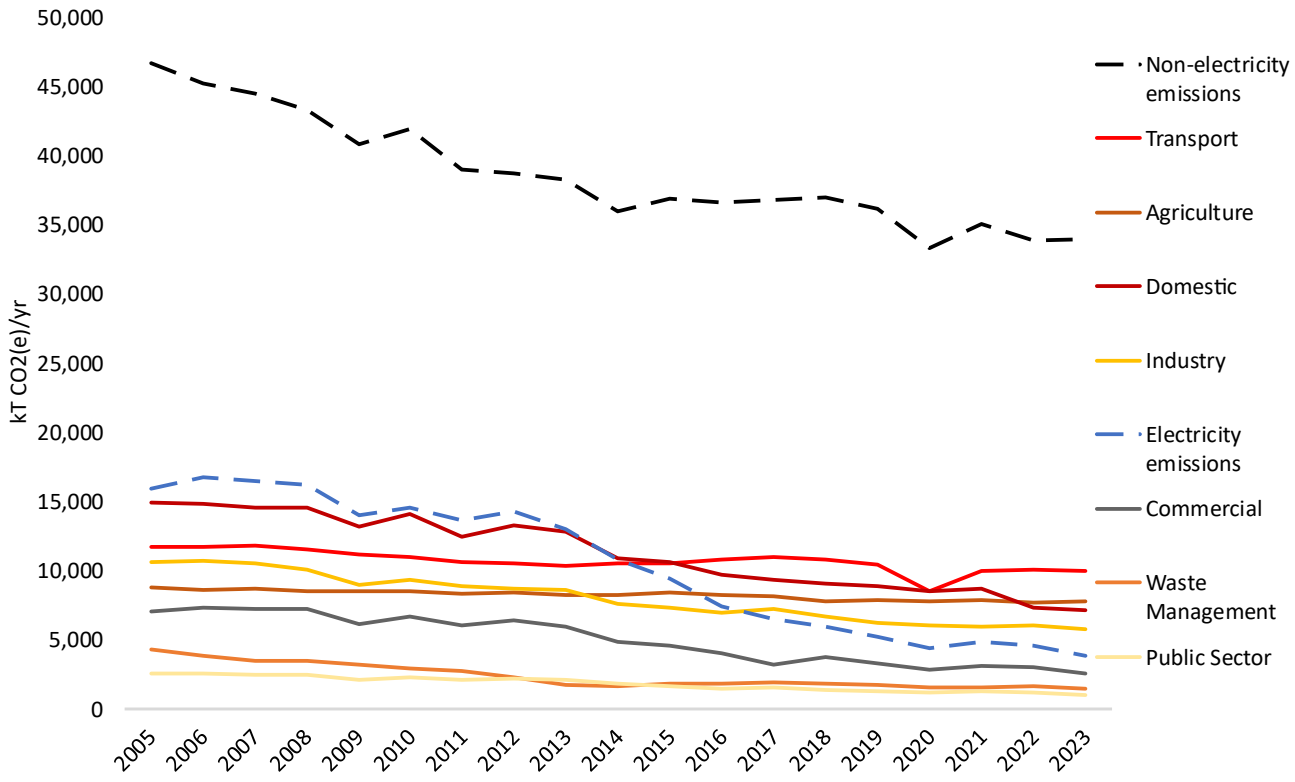

Figure 2.5: Scottish greenhouse gas emissions 2005 to 2023 (LULUCF net benefits small and not shown) (DESNZ, 2025d)

2.4.8.9 Increasing low carbon electricity supplies so that electricity may be used to reduce fossil fuel will deliver carbon emission reductions in those sectors. The continued delivery of low carbon electricity generation facilities beyond 2030 is therefore necessary to reduce emissions from those sectors.

2.4.8.10 Critically, the CCC concluded that "The acceleration required in emissions reduction to meet the 2030 target [of a 75% reduction compared to 1990 levels] is now beyond what is credible" and that "Current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act" (CCC, 2024b), p10.

2.4.9 Statement to Scottish Parliament (2024)

2.4.9.1 The Scottish Government responded to the CCC's assessment of its interim carbon emissions reduction targets through a statement made to the Scottish Parliament in 2024.

2.4.9.2 The statement explained that the CCC's view is that the UK is already substantially off track for 2030 and that achieving future UK carbon budgets will require a sustained increase in the pace and breadth of decarbonisation across most major sectors.

2.4.9.3 The statement also reiterated Scotland's "unwavering commitment to ending our contribution to global emissions by 2045 at the latest, as agreed by Parliament on a cross-party basis" while committing to "bring forward expedited legislation to address matters raised by the CCC and ensure our legislative framework better reflects the reality of long-term climate policy making" (Scottish Government, 2024d).

2.4.10 Scotland's Carbon Budgets (2025)

2.4.10.1 Pursuant to their request for advice under Section 2C of the Climate Change (Scotland) Act 2009, the CCC published Scotland's Carbon Budgets, Advice for the Scottish Government in May 2025.

2.4.10.2 The CCC proposed four deliverable carbon budgets, each covering consecutive five-year periods with the first starting in 2026. The CCC stated that meeting each carbon budget would lead Scotland to the achievement of its 2045 Net Zero target. However, "Getting to Net Zero by 2045 will require immediate action, at pace and scale." (CCC, 2025b), p9.

2.4.10.3 The Balanced Pathway shown in Figure 2.6 sets the CCC's recommendation for the level of each of Scotland's carbon budgets from the first ("CB1") to the fourth ("CB4"). The recommended carbon budgets are aligned to Scotland's 2045 Net Zero target and the UK Balanced Pathway to achieve Net Zero by 2050 across the UK (CCC, 2025b), p44.

2.4.10.4 Almost half of emissions reductions in the CCC's Balanced Pathway come from electrification, particularly the roll-out of electric vehicles (EVs) and heat pumps and the remaining decarbonisation of electricity generation" (CCC, 2025b), p10. Over the first two carbon budgets, covering the period to 2035, the CCC recommend that carbon emissions are reduced through the electrification of key technologies across the economy, fuelling an increase in electricity demand and a requirement for an increase in low carbon electricity supply.

2.4.10.5 Electricity as a source of industrial energy also increases in the CCC's Balanced Pathway, doubling from 2025 to 2035 and reaching approximately 33% of energy supplied. By 2045, this needs to nearly double again to just under 60% as most fossil fuels are eradicated from industrial use.

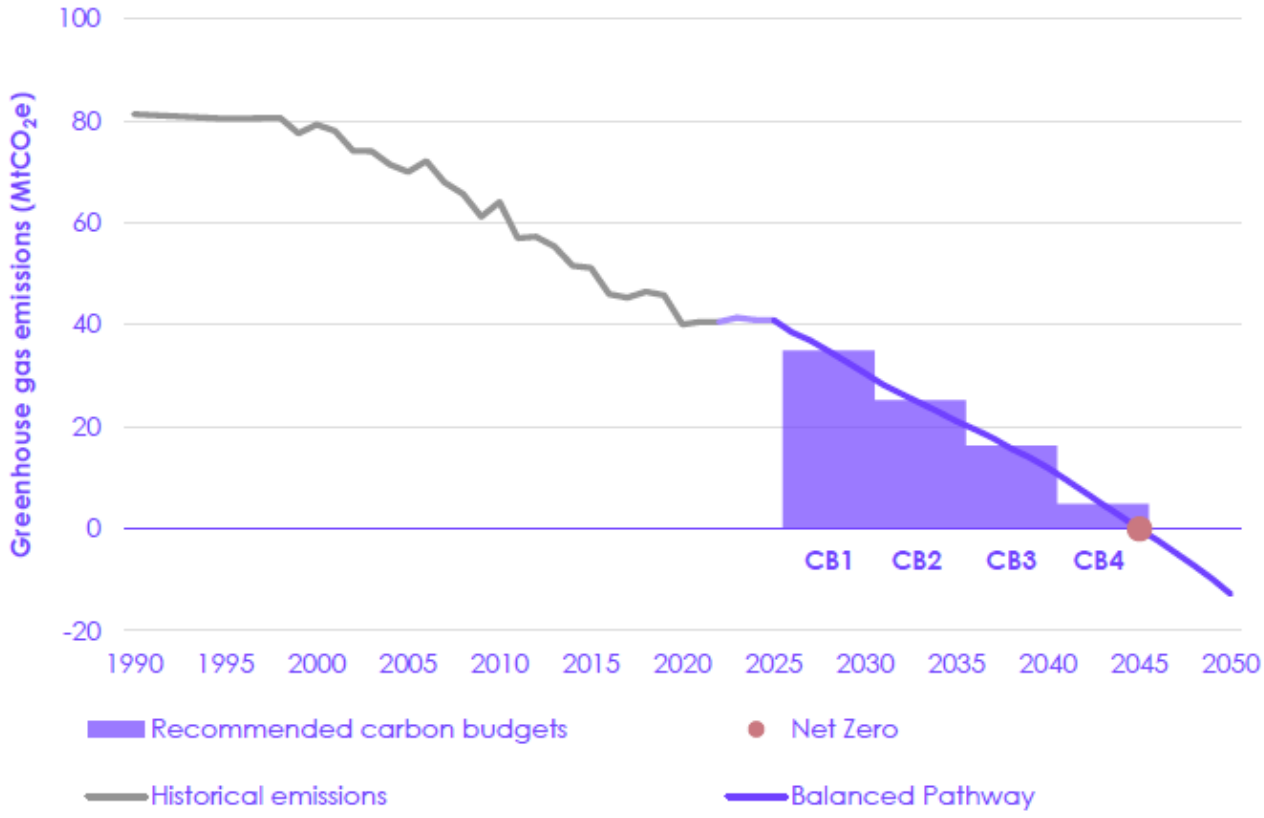

Figure 2.6: The recommended carbon budgets for Scotland (CCC, 2025b), Figure 1

2.4.10.6 Further carbon emission reductions are sought from increasing energy efficiency and making low carbon choices (e.g. an increase in the use of public transport), carbon reductions in shipping and aviation, nature-based measures and low carbon farming methods.

2.4.10.7 Critically, while most carbon emissions in Scotland have so far involved actions by business and Government, the CCC expect that households will need to make changes such as replacing internal combustion engine vehicles with EVs, and boilers with heat pumps, to meet Scotland's carbon budgets. The plentiful supply of affordable, low carbon electricity will be a critical enabler to this transition.

"In our pathway, the capacity of variable renewables in Scotland (including offshore and onshore wind and solar) more than triples from 15GW in 2023 to 49GW by 2035, increasing to 66GW 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)." (CCC, 2025b), p12.

2.4.10.8 The CCC note that because the electricity system in Scotland is already largely decarbonised, the share of carbon emissions abatement in Scotland from electricity is relatively lower than in the rest of the UK. However, as in the UK pathway, electrification remains the key contributor to Scotland's pathway to Net Zero. Therefore, the development of new low carbon generation capacity is critical to enable that electrification.

2.4.10.9 The Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 came into force on 10 October 2025. These Regulations set the Scottish carbon budgets at levels which are consistent with those set out in the CCC's advice.

2.4.11 Progress in reducing emissions in Scotland (2026)

2.4.11.1 The CCC's most recent progress in reducing emissions in Scotland report, the 2025 Report to Parliament, was published in February 2026 (CCC, 2026).

2.4.11.2 The report highlighted Scotland's newly legislated emissions targets which are consistent with achieving Net Zero by 2045, supported by Scotland's new five yearly carbon budgets, covering the period 2026 to 2045 and shown in Figure 2.6.

2.4.11.3 Greenhouse gas emissions in Scotland fell 2.6% between 2021 and 2023, to less than half the levels seen in 1990, mainly driven by a rapid scale-up of wind and solar electricity generation and an emissions reduction from buildings, with a likely behavioural response to record-high gas prices being a major factor.

2.4.11.4 The CCC caution that emissions from buildings vary considerably year-to-year due to annual variations in temperature and that it is highly uncertain whether behavioural responses will be maintained as gas prices reduce (CCC, 2026), pp11-12. The CCC therefore stress that action in Scotland must broaden to more sectors (CCC, 2026), p9.

2.4.11.5 The CCC advise that a strong policy position around zero emission vehicles, coupled with good progress in the rollout of EVs and charging infrastructure, support the delivery of transport emissions reductions prior to 2030. These measures will increase electricity demand in Scotland prior to 2030 which will be sustained and grow as transport is increasingly electrified beyond 2030.

2.4.11.6 The Scottish Government has a target to decarbonise heating systems in all buildings where reasonable and practicable to do so by 2045. The CCC report that 28% of new homes in Scotland in 2024 were built with low carbon heating in the form of electrically powered heat pumps or direct electric heating. An increase in electricity demand will occur as a result of measures to keep new and retrofitted existing homes warm while achieving Scotland's Net Zero targets (CCC, 2026), pp17-18.

2.4.11.7 Critically, the CCC observe that Scottish wind capacity is increasing year-on-year, but deployment needs to continue to ramp up fast to achieve the Scottish Government's ambitions (CCC, 2026) Figure 4.8. The CCC also advise that due to its natural advantages in wind generation, further action to expand renewable capacity and transmission infrastructure in Scotland is essential to deliver Scotland's fair contribution to UK wide targets, including the UK's 2030 NDC (CCC, 2026) p123.

2.5 NESO's Future Energy Scenarios

2.5.1.1 NESO's annual FES publications explore strategic, credible choices to propel GB on the route to decarbonisation.

2.5.1.2 The FES are important points of view, which contribute to an objective assessment of the need, scale and source of new electricity generation in GBto build a picture of the ways in which Net Zero could be reached.

2.5.1.3 FES 2024 pathways were considered by Government in its Clean Power 2030 Action Plan. FES 2025 further develops those pathways based on the ambition and pace of the clean power target, while accelerating progress across the whole energy system and looking beyond 2030 (FES, 2025), p11.

2.5.1.4 Three of the FES 2025 pathways meet Net Zero in 2050. A counterfactual that does not meet Net Zero is also presented.

2.5.1.5 The national legally binding commitments to achieve Net Zero by 2050 and the interim commitments made through the NDCs and Carbon Budgets underpin the urgency for new low carbon generation infrastructure to be built and commissioned, and Government support for such infrastructure is critical.

2.5.1.6 A key FES 2025 observation, which is consistent with previous FES publications, is that in all lower-carbon futures, the electricity sector will not operate in isolation from other energy sectors. Rapid decarbonisation is required across all areas of demand, including residential, transport, industrial, and commercial sectors. Deep electrification of all those areas is required in order to meet Net Zero, and the need for urgent electrification will increase year-on-year to achieve widespread electrification.

2.5.1.7 The pathways included in FES 2025 show the scale of work still ahead of GBto achieve Net Zero, particularly "beyond the power sector and beyond 2030". NESO pathways follow a rapid acceleration in energy transition built on the foundations delivered to date, followed by growth throughout the 2030s, provided that the foundations for future growth are laid now (FES, 2025), p5.

2.5.1.8 Therefore, FES 2025 makes a new key observation: the need for the concurrent delivery of two 'waves' of activity prior to 2030.

2.5.1.9 The first "wave", is completing initiatives which are planned prior to 2030. For example, constructing and commissioning already-consented generation assets, and reducing fossil fuel demand in the heat and transport sectors through electrification.

2.5.1.10 The second 'wave', is preparing for expanded energy infrastructure beyond 2030, including both networks and generation assets, to deliver energy security, resilience and carbon reductions, and to unlock the opportunities of a clean energy system for the future (FES, 2025), pp7 to 11.

2.5.1.11 While FES 2025 states that "Pathways [to Net Zero] are narrowing but optionality and uncertainty on the route to Net Zero remain" (FES, 2025), p20, NESO remain consistent with their view on the critical future role of wind and solar: "As demand and renewable generation grow, our pathways use new forms of flexibility to ensure security of supply. All pathways see substantial increases in renewable wind and solar generation to supply low carbon power" (FES, 2025), p47. FES 2025 Net Zero compatible pathways include 42GW to 48GW of operational offshore wind in 2030, rising to 68GW to 86GW in 2035 and 92GW to 94GW in 2040.

2.5.1.12 The increased electrification of demand increases linkages between electricity, gas, bioenergy, carbon and hydrogen, which continues to be a potentially interesting and valuable technology to support Net Zero. Once hydrogen has been produced, it can be stored, transported, and used in a range of applications as a substitute for natural gas or other carbon intensive fuels.

2.5.1.13 Low carbon hydrogen, which may be produced from the electrolysis of water, using low carbon electricity is also signalled as likely needed in the UK's future energy system. Therefore, the need for renewable electricity generation capacity is broadly unaffected by the scale of hydrogen adoption in Britain.

2.5.1.14 All FES 2025 Net Zero pathways include an increased take-up of Zero Emission Vehicles and hydrogen use in home heating (as opposed to electrical heating methods) however there are differences between the pathways.

2.5.1.15 In FES 2024, NESO stated that "a high usage of renewables is enabling the carbon intensity of electricity generation to continue to fall," (FES, 2024), p15.

2.5.1.16 From their FES 2025 look-back at previous years, NESO also found that "Decarbonisation of the power sector has driven most of the progress on emissions reductions to date" and also explain that "as more sectors electrify, low carbon electricity will continue to enable widespread emissions reduction across Great Britain" (FES, 2025), p29.

2.6 Summary of legislative and policy context

2.6.1.1 Urgent and unprecedented action is needed on an international scale to meet the commitments established through the Paris Agreement to decarbonise society and limit global warming.

2.6.1.2 The UK and Scotland have legally binding targets to decarbonise. Both are developing new policies and enhancing existing policies to ensure that those targets are met in a secure and affordable fashion.

2.6.1.3 However, policies are not yet sufficient to deliver to those national commitments, and delivery against those policies is further behind.

2.6.1.4 Without a rapid increase in the supply of low carbon electricity, the urgent requirement to decarbonise other sectors (as will be required to meet future Carbon Budgets) is unlikely to be achieved.

2.6.1.5 The Clean Power target is an outcome focussed target, defined in the Clean Power Plan, and the plan recognises that there are multiple different possible pathways to achieving that target. While the plan's capacity ranges are "a foundation to guide rapid policy development and focus delivery … the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained" (UK Government, 2024), p31. Therefore, the flexibility in Government's plan allows that "potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere" (UK Government, 2024), p25.

2.6.1.6 Further, climate change will not "stop" in 2030 so efforts to limit climate change must not stop in 2030 either. The Clean Power Plan recognises the need to keep power clean beyond 2030. Therefore, the continued delivery of new low carbon generation facilities beyond 2030 is necessary.

2.6.1.7 The 2026 Updated Offshore Wind Policy Statement (Scottish Government, 2026) includes a reset of the Scottish Government's offshore wind policy ambition to deliver up to 40GW of new offshore wind capacity by 2040. This ambition is consistent with the need to keep power clean beyond 2030 as demand grows through the electrification of other sectors and reaffirms the Scottish Government's commitment to supporting the delivery of the existing project pipeline while clarifying that no further offshore wind leasing rounds are planned in the near term.

2.6.1.8 The continued development of schemes which aim to deliver before 2030 and of schemes which aim to deliver in the 2030s is a key enabler of Governments plans to support delivery of its Clean Power target on the way to achieving Net Zero.

3 Marine Planning Framework

3.1.1.1 Scottish marine planning is governed by two acts: the Marine (Scotland) Act 2010 for Scottish Territorial Seas (out to 12nm); and the MCAA 2009 for Scottish Offshore Waters (between 12nm to 200nm). Given the location of Morven North, located wholly beyond 12nm, the Marine (Scotland) Act 2010 is not considered below, aside from offering context for the policy hierarchy as set out.

3.1.1.2 The two Acts established a legislative framework for marine planning to enable demands on the marine environment to be managed in a sustainable way, while providing a regulatory framework for licensing marine developments.

3.1.1.3 A tiered approach is set out to developing marine planning in the UK and Scotland. The framework includes the following elements:

- UK Marine Policy Statement (MPS);
- Scottish National Marine Plan (NMP);
- Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE);
- Regional Marine Plans (RMPs).

3.2 UK Marine Policy Statement

3.2.1.1 The UK MPS (UK Government, 2011), prepared under the MCAA (2009), was created by the UK Government and adopted by the devolved administrations including the Scottish Government. The UK MPS provides a framework for preparing marine plans within the UK and for taking decisions on matters affecting the marine environment in the absence of adopted marine plans.

3.2.1.2 The UK MPSs vision is for 'clean, healthy, safe, productive and biologically diverse oceans and seas' and provides five high-level marine objectives, including:

- Achieving a sustainable marine economy;
- Ensuring a strong, healthy and just society;
- Living within environmental limits;
- Promoting good governance;
- Using sound science responsibly.

3.2.1.3 In addition to the overarching objectives, sectoral considerations are provided, including in relation to energy production and infrastructure development, providing an indication that offshore wind will play the most important role in growing renewable energy capacity in the UK. The above aims are replicated through the Scottish National Marine Plan (NMP) set out below with the key objectives of each matching closely. Given the additional granularity contained within the NMP and any policy assessment, the planning assessment within this document will focus on the NMP in the first instance, with compliance with the NMP enabling compliance with the UK Marine Policy Statement as a result of this alignment.

3.3 Scottish National Marine Plan (NMP)

3.3.1.1 The Scottish Government adopted and published the first NMP (Scottish Government, 2015) in March 2015. Within the NMP, policies are provided for developments and use of marine resources in Scottish Offshore Waters out to 200nm from the coast. The Scottish NMP, which is compatible with the UK MPS (UK Government, 2011) and other marine plans, supports marine development in Scottish Offshore Waters while incorporating appropriate protections and safeguards for the environment, other sea users and existing marine activities. There are a number of strategic objectives which aim to deliver a robust approach to managing Scotland's marine area including:

- achieving a sustainable marine economy;
- living within environmental limits;
- ensuring a strong, healthy and just society;

- promoting good governance;
- using sound science responsibly.

3.3.1.2 The NMP provides both general policies to support delivery of strategic objectives, and specific sectoral objectives which may be achievable over the plan period or set direction for longer term goals. The objectives for offshore wind and other marine renewables, as listed under Chapter 11 on page 78, are:

- sustainable development of offshore wind, wave and tidal renewable energy in the most suitable locations;
- economic benefits from offshore wind, wave and tidal energy developments maximised by securing a competitive local supply chain in Scotland;
- alignment of marine and terrestrial planning and efficient consenting and licensing processes including but not limited to data sharing, engagement and timings, where possible;
- aligned marine and terrestrial electricity transmission grid planning and development in Scottish Offshore Waters;
- contribute to achieving the renewables target to generate electricity consumption from renewable sources by 2020;
- contribute to achieving the decarbonisation target of 50 gCO_2/kWh by 2030 (to cut carbon emissions from electricity generation by more than four-fifths);
- sustainable development and expansion of test and demonstration facilities for offshore wind and marine renewable energy devices;
- coordinated Government and industry-wide monitoring.

3.3.1.3 The relevant policies, both general policies and those in specific relation to offshore wind development, from the currently adopted NMP, are listed below and are considered in full in Appendix A.

- GEN 1: General Planning Principle;
- GEN2: Economic Benefit;
- GEN4: Co-existence;
- GEN5: Climate Change;
- GEN6: Historic Environment;
- GEN7: Landscape/seascape;
- GEN9: Natural Heritage;
- GEN10: Invasive non-native species;
- GEN11: Marine Litter;
- GEN12: Water quality and resource;
- GEN13: Noise;
- GEN14: Air Quality;
- GEN17: Fairness;
- GEN18: Engagement;
- GEN19: Sound Evidence;
- GEN21: Cumulative Impacts;
- RENEWABLES 1;
- RENEWABLES 4;
- RENEWABLES 5;
- RENEWABLES 6;
- RENEWABLES 7;
- RENEWABLES 8;
- RENEWABLES 9;
- RENEWABLES 10.

3.3.1.4 The NMP has been reviewed, and the effectiveness of its implementation has been reported on two separate occasions since its adoption. The latest review in 2021, identified that while the plan is still effective, it needs to be updated to account for significant national and global developments, which impact the use and management of Scottish marine resources. Key developments include the

withdrawal of the UK from the EU on 31 January 2020, the Global Climate Emergency, Scottish Government's commitment to Net Zero by 2045, the COVID-19 pandemic, rapid pace of change and interest in the marine sphere and the delivery of the Scotland's Blue Economy approach (Scottish Government, 2021). The second iteration of the NMP (NMP2), which is currently at an early stage of preparation, is likely to take into account the key elements highlighted in the 2021 review, particularly around the climate emergency. The NMP2 will be supported by a Strategic Environmental Assessment (SEA) and will be informed by the SEA Scoping Report which was consulted upon in 2023 (Scottish Government, 2023c).

3.3.1.5 On 15 August 2024, Scottish Ministers announced an update to the NMP2 development timeline (NMP2 - Stakeholder Engagement Strategy and Statement of Public Participation) (Scottish Government, 2024b). The updated timeline introduces further opportunity for stakeholder engagement as the plan is developed, including consultation on the Planning Position Statement which was released in Autumn 2024 (Scottish Government, 2024c). The Position Statement sets out the intended policy direction for NMP2 in relation to all stakeholder feedback, and provides stakeholders with an early opportunity to help shape the plan policies prior to consultation. The Position Statement was intended for late 2025 but has not yet commenced. As of early 2026, there has been no further indication from the Scottish Government as to when the NMP2 will be published for consultation, however it is understood the postponement is tied to the ongoing workstream on the updated SMP-OWE. After considering stakeholder feedback, the Planning Position Statement laid out 12 draft high-level objectives, alongside associated policy ideas generated through extensive engagement. These 12 high-level draft objectives can be found in Table 3.1.

Table 3.1: High-level draft objectives from National Marine Plan 2 Planning Position Statement (Scottish Government, 2024c)

Themes	Draft high-level objectives
Climate Mitigation and Adaptation	Respond to the Global Climate Emergency, achieving Net Zero by 2045 and realising adaptation opportunities
Ecosystem health, protection and restoration	Respond to the Global Biodiversity Crisis, protecting Scotland's marine and coastal biodiversity
	Restore and enhance Scotland's marine and coastal ecosystem services in line with Scotland's Biodiversity Strategy
Sustainable marine economy	Enable multi-use of Scotland's seas to reduce conflict for marine space
	Safeguard opportunities for marine economic sectors to operate, based on available evidence and in line with Scotland's ambitions
	Enable use of Scotland's seas to support the development of Net Zero sectors in line with Scotland's ambitions
Island and coastal community development	Enhance and safeguard opportunities for sustainable, resilient and diverse marine economies within Scotland's island and coastal communities
Cultural Heritage	Protect, and where appropriate, enhance access to, and appreciation of, Scotland's marine and coastal cultural heritage

Themes	Draft high-level objectives
Social and Cultural Wellbeing	Facilitate equitable access to Scotland's seas and shared stewardship to benefit wellbeing and to support thriving communities
Implementation	Use evidence-based decision making to manage marine space in line with Scotland's wider ambitions
	Contribute to monitoring and evaluation of NMP2 implementation
Food production	Support the growth and development of sustainable marine food production which supports thriving and resilient communities across Scotland

3.3.1.6 The Planning Position Statement highlighted the Scottish Government's maintained support for sectoral planning for marine renewables (including offshore wind) and a plan-led approach to leasing. Extensive work aims to maximise the benefits of offshore wind and address the social and environmental issues highlighted in Table 3.1.

3.4 Sectoral Marine Plan for Offshore Wind

3.4.1.1 The first SMP-OWE (Blue Seas Green Energy) (Marine Scotland, 2011) was adopted in 2011, following which, draft SMPs for wind, wave and tidal were produced in 2013 (Marine Scotland, 2013).

3.4.1.2 Subsequently, in 2017, Crown Estate Scotland (CES) announced their intention to run a leasing round for commercial-scale offshore wind energy projects in Scottish waters, which was named the ScotWind Leasing Round. To inform the spatial development of this leasing round, the Marine Planning and Policy Division of the Scottish Government undertook a planning exercise to identify areas suitable for the development for offshore wind.

3.4.1.3 The SMP-OWE (Scottish Government, 2020b) built upon the work undertaken in the 2011 and 2013 plans, and incorporated technological, policy, regulatory and market development to create a new strategic planning process. The SMP-OWE seeks to contribute to achieving Scotland's energy and climate change objectives by providing a spatial strategy and was used to inform the ScotWind leasing process which concluded in 2022. A SEA, HRA and Socio-Economic Impact Assessment (SEIA) were carried out for the SMP-OWE.

3.4.1.4 In the recent ScotWind Leasing Round process – which the Morven Site (subsequently spilt into Morven North and Morven South) was part of - a total of 20 proposed OWF projects were awarded option agreements within 15 Plan Options Areas (POAs), for a total of 27.6GW of capacity. This includes 17 proposed OWF projects awarded in January 2022, with a further three sites awarded in August 2022 as part of the 'ScotWind Clearing Round'.

3.4.1.5 The SMP-OWE is subject to the Iterative Plan Review (IPR) process to ensure that it is underpinned by best available evidence, taking into account updates and progression of developments (e.g. detailed site survey results and assessments for projects, the construction of projects, Innovation and Targeted Oil and Gas (INTOG) leasing round and further changes to policy and regulatory context). Work on the next iteration of the SMP-OWE is underway; a consultation on the Draft Updated Sectoral Marine Plan for Offshore Wind Energy was held between 30 May 2025 and 22 August 2025. The consultation draft updated the planning baseline from the 2020 SMP-OWE and, inter alia, sought to "maximise the delivery of low carbon electricity from offshore wind farms in Scottish waters in support of the Scottish Government's target to cut GHG emission to Net Zero by 2045 and to do so by maximising the delivery of CES's ScotWind and INTOG leasing rounds between now and 2035." The draft SMP-OWE does not provide an update in regard to adoption, and therefore it is assumed that a finalised draft plan is proposed for Autumn 2025, with adoption and publication following as soon as possible (Scottish Government, 2025a).

3.4.1.6 The draft SMP-OWE has provided key considerations for project design, project level assessment and decision making at a national level, which cover potential impacts from all aspects of offshore wind array development and includes high-level considerations of construction and maintenance, alongside additional regionally specific considerations.

3.4.1.7 The key opportunities and risks of offshore wind array development at a national level are considered to be:

- Environmental Opportunities
  - Potential creation of artificial habitats for marine biodiversity;
  - Reduction in GHG emissions through decarbonisation of the energy sector.
- Environmental Risks
  - Effects on resident and migratory bird species due to collision or displacement;
  - Effects on marine mammals due to displacement on barrier effects;
  - Effects on biodiversity, flora and fauna, particularly loss and/or damage of subtidal sand and gravel;
  - Effects on landscape and coastal character and also on visual receptors.
- Socio-economic Opportunities
  - Job creation and reskilling/upskilling of workforce;
  - Potential local community benefits, through increased spending in areas;
  - Contribution to secure energy supply and energy security in the UK.
- Socio-economic Risks
  - Cessation of all fishing activity in floating arrays and reduced fishing activity within fixed arrays;
  - Reduction in fishing fleet and loss of fishing jobs;
  - Effects on navigational safety associated with shipping.

3.4.1.8 As per the EIA Report, Morven North can provide the above mentioned environmental and socio-economic opportunities and the risks therein can be avoided mitigated or compensated.

3.4.1.9 What was the Morven Site (both Morven North and Morven South) forms what is identified as SMP Option Area E1C located in the East region of the plan. The draft SMP-OWE also summarises the most significant potential risks and opportunities associated with each draft updated SMP region, although this list is not exhaustive. There are a number of designated sites located in the East region including those which host protected habitats and species. In addition, there are a number of important spawning grounds for fish, which are important for commercial fisheries. Dolphins and seabirds are prevalent throughout the region. The draft SMP-OWE identifies the key environmental risks of the East region as being:

- Collision or displacement of birds, including kittiwake, guillemot, razorbill, gannet, puffin, herring gull, great black-backed gull and taiga bean geese;
- Displacement of marine mammals, including grey seal, minke whale and bottlenose dolphin, and sandeel from underwater noise;
- Disruption to navigational safety on ferry route to Orkney Islands and Aberdeen/Peterhead, Royal Yachting Association cruising routes;
- Loss and/or damage to ocean quahog aggregations.

3.4.1.10 The draft SMP-OWE also highlights how fishing is an important activity in the East region alongside two busy airports residing in the region (Aberdeen and Edinburgh). In addition, there is also a high concentration of defence assets including safeguarding of navigational routes and national critical infrastructure. The East region is a busy shipping route area both in relation to vessel traffic for the oil and gas industry and lifeline ferry routes. The key socio-economic risks for the East region have been identified as:

- Reduction in fishing activity by vessels over 12m utilising demersal trawls, midwater trawls, demersal seines and mechanical dredges;
- Diversion of the Eastern Green Link 3 cable route (Peterhead to South Humber power interconnector).

3.4.1.11 As set out within Volume 2, Chapter 12 Commercial Fisheries and Chapter 13 Shipping and Navigation of the EIA Report, Morven North is considered not to result in significant adverse effects (in EIA terms) on commercial fishing or shipping receptors, and any adverse cumulative effects will be appropriately mitigated.

3.5 Consenting Process for infrastructure in Scottish Offshore Waters

3.5.1.1 Morven North is a generating station with a capacity of greater than 50MW located in Scottish Offshore Waters (between 12nm to 200nm) and therefore it requires the following consent and licences:

- a Section 36 Consent under the Electricity Act 1989 for the offshore generating station located within the Morven North Boundary;
- a marine licence for the Morven North generating station (wind turbines, foundation and inter-array cables) under the MCAA 2009;
- a marine licence for the Morven North OSP infrastructure (OSPs, OSP foundations and interconnector cables within the site boundary) under the MCAA 2009.

3.5.1.2 A decommissioning scheme, as well as any additional pre-construction licences or Safety Zone declarations, will be discussed and agreed with the relevant consenting authority during the pre-construction phase of Morven North as required.

3.5.2 The Electricity Act 1989

3.5.2.1 Under the Electricity Act 1989, a Section 36 Consent is required for the construction and operation of an energy generation station of capacity greater than 50MW where it is located between 12nm and 200nm off the Scottish coast. Morven North will have a generating capacity in excess of 50MW, and therefore a Section 36 Consent is required (noting that the Scottish Government are considering increasing the 50MW threshold with a consultation running until the end of March 2026, although any changes would only apply to new applications submitted after any change came into force). In accordance with Schedule 9 of the Electricity Act 1989, regard is to be given and reasonable mitigation provided for any effect of proposals to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest. An application for consent has been submitted to MD-LOT, which acts on behalf Scottish Ministers to process the application.

3.5.2.2 During October and November 2024, the UK and Scottish Governments held a consultation on proposals to reform the consenting process under the Electricity Act 1989 for electricity infrastructure in Scotland. Following this consultation, a package of reforms are to be progressed to make the electricity consenting process in Scotland more efficient including to ensure local communities are consulted on project proposals at an early stage. Such reforms include amendments to the pre-application process, including the introduction of mandatory pre-application requirements. The Planning and Infrastructure Act 2025, which achieved Royal Assent on 18 December 2025, provides, among other things, that the Secretary of State or the Scottish Ministers may make regulations setting out matters regarding applications for Section 36 consents under the Electricity Act 1989, and may make regulations amending the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 regarding EIA in connection with section 36 consent applications. At the time of writing no such regulations have been published.

3.5.3 Marine and Coastal Access Act 2009

3.5.3.1 The MCAA 2009 applies to all UK offshore waters out to 200nm, except Scottish Territorial Seas which are covered by the Marine (Scotland) Act 2010. Under the MCAA 2009 (Part 4) there is the requirement for a marine licence to be obtained prior to the construction, alteration or improvement of any works or deposit of any object in or over the sea, or on or under the seabed.

3.5.3.2 Scottish Minsters may grant a marine licence under Part 4 of the MCAA 2009 with consideration of input and recommendations from MD-LOT.

3.5.4 Environmental Impact Assessment Regulations

3.5.4.1 The requirement for EIA in Scotland originates from the EU Directive on the assessment of the effects of certain public and private projects on the environment (EIA Directive) (2011/92/EU, as amended by Directive 2014/52/EU) and the EIA Regulations. When applying for Section 36 Consent or a marine licence, an EIA Report is a requirement to support these applications if Morven North is likely to have a significant effect on the environment due to factors such as the scale, location or nature of the project.

3.5.4.2 Any EU-derived legislation still has effect in domestic law under the European Union (Withdrawal) Act 2018. The Marine Environment (EU Exit) (Scotland) (Amendment) Regulations 2019 has further applied minor changes to regulations, such as the Environment, Food and Rural Affairs (EIA) (Amendment) (EU Exit) Regulations 2019 with respect to the Electricity Works (EIA) Regulations 2017[1]. These changes ensure the continued operability of EIA Regulations to any application in Scottish waters which are seeking a Section 36 Consent and/or a marine licence, as well as continuing to set the framework for the EIA process in Scotland.

3.5.4.3 This Offshore EIA Report has been carried out in accordance with the following regulations (collectively referred to as the EIA Regulations):

- The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- The Marine Works (Environmental Impact Assessment) Regulations 2007.

3.5.4.4 Under the EIA Regulations, an EIA Report is required to be prepared and submitted to support an application for a Section 36 Consent or a marine licence relating to offshore renewable energy developments. The primary objective of EIA is to protect the environment by ensuring that the likely significant environmental effects of a project are properly understood and mitigated where appropriate before relevant consents are granted. An EIA Report is necessary for installations aiming to harness the power of wind for energy production (wind farms) if the project is likely to have significant effects on the environment. As Morven North meets both of these criteria, an EIA is required as part of the application.

[1] Part 3 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 with part 4 detailing the EIA Report process.

4 Other legislation

4.1.1.1 In addition to the Marine Planning Framework, the following legislation is also of relevance to the consenting and development of Morven North.

4.2 Energy Act 2004

4.2.1.1 The Energy Act 2004 (as amended) makes provision for, among other aspects, the development, regulation and encouragement of the use of renewable energy sources and giving effect to international agreements relating to pipelines and offshore installations.

Safety Zones

4.2.1.2 Under Section 95 of the Energy Act, where a renewable energy installation is proposed to be constructed, and the Scottish Ministers consider it appropriate for safety reasons, designated areas may be declared as Safety Zones.

4.2.1.3 Safety Zones are intended to ensure the safety of the renewable energy installation or other installations in the vicinity during construction, Operation and Maintenance (O&M), extension or decommissioning. Safety Zones may exclude non-OWF vessels from navigating through a designated Safety Zone area for a specific period.

4.2.1.4 Morven North expects to apply for Safety Zones during construction and major maintenance activities, around certain offshore structures (i.e. wind turbines).

Decommissioning

4.2.1.5 The statutory requirements for the decommissioning of Offshore Renewable Energy Installations (OREIs), and their respective electricity lines, are contained within Sections 105 to 114 of the Energy Act 2004 (as amended by the Energy Act 2008 and the Scotland Act 2016). Under the terms of the Energy Act, any persons responsible for these installations or lines in Scottish waters or in a Scottish part of a Renewable Energy Zone (REZ) can be requested by the Scottish Minsters to prepare, and carry out, a costed decommissioning programme. This decommissioning programme will be prepared for submission to, and approval from, Scottish Ministers (Scottish Government, 2022b).

4.2.1.6 Scottish Government offshore renewable energy decommissioning guidance (Scottish Government, 2022b) states that "an indication of the decommissioning proposals should be included as part of the statutory consenting or licensing process so that the feasibility of removing the infrastructure can be assessed as part of the application process". Additionally, it states that "a full description should be provided, supported by diagrams, of all items associated with the generating station to be decommissioned" prior to construction, and that "the Scottish Ministers expect that decommissioning programmes should be submitted for approval no later than six months in advance of construction, and that the first drafts should be submitted about 18 months in advance" (Scottish Government, 2022b).

4.2.1.7 The power to determine specific approaches to decommissioning is held by the Scottish Ministers, including specifying what form, timing and size of financial securities are necessary. The content expected within decommissioning programmes includes:

- decommissioning standards;
- financial security;
- residual liability;
- industry cooperation and collaboration.

4.2.1.8 Further details on decommissioning can be found at Volume 1, Chapter 3: Project Description, of the EIA Report.

4.3 Habitats Regulations

4.3.1.1 Article 3 of EU Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna (hereafter referred to as the 'Habitats Directive') required the establishment of a European network of conservation sites, referred to as Special Areas of Conservation (SACs), in order to help protect and conserve habitats and species identified in Annex I and II of the Directive. These habitats and species (excluding birds) were considered to be most at risk at a European level.

4.3.1.2 Under Article 4 of the EU Council Directive 2009/147/EC on the conservation of wild birds (hereafter referred to as the 'Birds Directive') lists of vulnerable bird species (detailed in Annex I of the Birds Directive) are provided protection through the implementation of Special Protection Areas (SPAs).

4.3.1.3 The requirements of the Habitats and Birds Directive relevant to Morven North are transposed into the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (hereafter referred to as the 'Habitats Regulations').

4.3.1.4 By virtue of the Conservation (Natural Habitats, &c.) (EU Exit) (Scotland) (Amendment) Regulations 2019, functions relating to SACs and SPAs have been transferred to the appropriate authorities or bodies in the UK/Scotland, as these no longer form part of the EU Natura 2000 Network.

4.3.1.5 Instead, the Habitats Regulations have created a UK-wide network of protected sites, including both the inshore and offshore marine areas in the UK, which retain the same protections as previous Natura 2000 sites and is referred to as the National Site Network. It includes all existing SACs and SPAs, and subsequent new SACs and SPAs which may be designated and continue to be referred to as European Sites. Furthermore, under Scottish Government policy, Ramsar Sites (wetlands of international importance designated under the Ramsar Convention) are also protected under the same statutory regimes.

4.3.1.6 Under the Habitats Regulations, Scottish Ministers must consider whether any plan or project, is likely to have a significant effect on a European Site before it can be authorised or carried out. If there is potential for a LSE[2] to occur, then an Appropriate Assessment (AA) of the implications on that site and its conservation objectives must be undertaken by the competent authority. This process is known as the HRA.

4.3.1.7 The HRA process, comprising Stage 1 (HRA screening) and, if required, Stage 2 AA, must be carried out before consent or authorisation can be given for Morven North. Permission should only be granted at Stage 2 by the competent authority where it is determined that the plan or project will not result in an adverse effect on the integrity of a designated site either alone or in combination with other plans and projects, unless HRA derogation requirements, including the securing of compensation measures, are met. A HRA Stage 1 screening report for the Morven Site was submitted to MD-LOT in July 2023 which screened a number of European sites to be progressed into a Report to Inform Appropriate Assessment (RIAA) for Morven North which has been submitted as part of the application. The RIAA concludes that the potential for adverse effects on site integrity cannot be ruled out for four SPAs and three qualifying features. It also considers on a *without prejudice* basis that adverse effects on site integrity may be possible for some other sites and species based on precedent from recent derogation decisions of the Scottish Ministers and the assessment undertaken using NatureScot's more precautionary assessment approach. As such, a derogation case with proposed compensation measures is provided as part of the application for these sites and species, partially on a *without prejudice* basis.

4.4 European Protected Species

4.4.1.1 European Protected Species (EPS) are species of plants and animals (other than birds) protected by law throughout the EU. They are listed within Annex IV of the Habitats Directive. It is an offence, with certain exceptions, to deliberately or recklessly capture/collect, disturb or injure an EPS.

4.4.1.2 Certain activities likely to cause disturbance or injury which would otherwise constitute an offence, can be carried out legally under an EPS Licence, as follows:

- Within Scottish Territorial Seas, an EPS Licence may be required under the Conservation (Natural Habitats, &c) Regulations 1994 (as amended) where there is potential for activities to injure or cause disturbance to an EPS. NatureScot is responsible for the administration of most licences in relation to EPS in Scotland. The exception is for purely marine species for purposes under regulation 44(2)(e) to (f), where MD-LOT on behalf of the Scottish Ministers, is the licensing authority.
- Within Scottish Offshore Waters (the area between the seaward boundary of Scottish Territorial Seas and the seaward boundary of the Scottish part of the Exclusive Economic Zone (EEZ)), an EPS Licence may be required under the Conservation of Offshore Marine Habitats and Species Regulations 2017 where there is potential for activities to injure or cause significant disturbance to an EPS (defined as a population level effect rather than at the level of individuals). MD-LOT is the licensing authority for these EPS Licences.
- Guidance from the Scottish Government (2023) states that if an activity taking place in the Scottish Territorial Sea (0nm to 12nm) is likely to cause to disturbance or injury to basking sharks, a licence is required to undertake activity legally. Basking sharks are protected from disturbance in Scotland under the Wildlife and Countryside Act 1981.

4.5 Priority marine features

4.5.1.1 Scottish Ministers formally adopted a list of 81 Priority Marine Features (PMFs) in 2014. The PMFs cover a variety of habitats and species that are a priority for conservation in Scottish Offshore Waters. PMFs include a range of intertidal and continental shelf habitats, deep sea habitats, mammals, fish and shellfish and other invertebrates.

4.5.1.2 The Priority Marine Features Guidance (Scottish Natural Heritage (SNH), 2016) addresses the policy requirement to conserve and protect PMFs, included in The Scottish Government Strategy for Marine Nature Conservation in Scotland's Seas (Scottish Government, 2010), and the NMP (including via policy Gen 9 Natural Heritage) (Scottish Government, 2015).

4.5.1.3 It should be noted that some PMFs are already protected as qualifying features of European sites, or via EPS legislation, and therefore will be considered from the HRA perspective as well as in the EIA Report where relevant.

4.6 Marine Strategy Framework Directive

4.6.1.1 On 15 July 2008, the Marine Strategy Framework Directive (MSFD) came into force and was officially written into UK law by the Marine Strategy Regulations in 2010. The UK's Good Environmental Status (GES) targets, as well as the approach for achieving these, were outlined in a "UK programme of measures" (Department for Environment, Food and Rural Affairs (DEFRA), 2015).

4.6.1.2 When determining whether to grant approval for developments, Scottish Ministers must ensure that in doing so it would not compromise achieving or maintaining GES. This is implemented in the UK through the Marine Strategy Regulations 2010 with some slight interpretation amendments made after EU Exit (Scottish Government, 2020c).

4.7 Marine Protected Areas

4.7.1.1 The management of Nature Conservation MPAs is aided by arrangements that are laid out in both the Marine (Scotland) Act 2010 and the MCAA 2009. Section 126 of the MCAA 2009 refers to Marine Conservation Zones (MCZs), which by virtue of Section 116 of the MCAA 2009 are the same as MPAs in Scotland. Under Section 126, MD-LOT, as the public authority, are obligated to consider if an activity is capable of affecting (other than insignificantly) a protected feature of a Nature Conservation MPA, or any ecological or geomorphological process on which the conservation of any protected feature of a Nature Conservation MPA is dependent.

4.7.1.2 Full authorisation for the activity must not be granted by MD-LOT unless the person applying for the authorisation satisfies MD-LOT that either:

1. there is no significant risk of the activity hindering the achievement of the conservation objectives for the Nature Conservation MPA; or
2. if there is a significant risk of the activity hindering the achievement of the conservation objectives for the MPA, that: (i) there is no other means of proceeding with the activity which would create a substantially lower risk of hindering the achievement of those objectives, (ii) the benefit to the public of proceeding with the act clearly outweighs the risk of damage to the environment that will be created by proceeding with it, and (iii) the person will undertake, or make arrangements for the undertaking of, measures of equivalent environmental benefit to the damage which the act will or is likely to have on the Nature Conservation MPA concerned.

4.7.1.3 If MD-LOT are of the belief that there is, or could be, a significant risk of the proposal hindering the achievement of the conservation objectives, then they are obliged to notify the appropriate statutory nature conservation bodies (NatureScot for MPAs within 12nm or the Joint Nature Conservation Committee (JNCC) for MPAs out with 12nm) of that fact.

4.8 Wildlife and Countryside Act 1981

4.8.1.1 The Wildlife and Countryside Act 1981 contains provisions to protect native wildlife and their habitats. It was primarily enacted to implement the Birds Directive and the Bern Convention and enhancing the protection of Sites of Special Scientific Interest (SSSI). The Act controls the release of non-native species and serves as a primary mechanism for wildlife protection in Britain (HM Government, 2025b).

4.9 National Planning Framework 4

4.9.1.1 National Planning Framework 4 (NPF4) was adopted in February 2023 and is the national spatial strategy for Scotland and sets out spatial principles, regional priorities, national developments and national planning policy (Scottish Government, 2023d). This includes the overall vision for working towards a Net Zero Scotland by 2045. The overarching spatial principles are:

- Just transition;
- Conserving and recycling assets;
- Local living;
- Compact urban growth;
- Rebalanced development;
- Rural revitalisation.

4.9.1.2 National Development 3: Strategic Renewable Electricity Generation and Transmission Infrastructure supports renewable electricity generation, repowering and expansion of the electricity grid.

4.9.1.3 A total of eighteen national developments are identified within NPF4, these include (as National Development 3) the development of “Strategic Renewable Energy Generation and Transmission Infrastructure” with these developments being required across the entirety of Scotland.

4.9.1.4 The relevance of being classed as a National Development is captured within the Statements of Need for such developments within NPF4. National Developments are described as "significant developments of national importance that will help to deliver the spatial strategy” It is then further explained 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 planning terms, this confirms that developments classed as being of national importance are considered to be acceptable in terms of planning principle.

4.9.1.5 With regard to National Development 3, it is stated that the Need for such developments is derived from the determination that “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" and that developments falling into this class include "On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity". The direct reference to offshore wind within this confirms the need for Morven North in planning policy terms.

4.9.1.6 Whilst NPF4 is largely onshore focussed, Policy 11 supports the development of all forms of renewable, low carbon and zero emissions technologies, subject to any adverse impacts being addressed and mitigated, both onshore and offshore.

5 Electricity and energy system development for Net Zero

5.1 Introduction

5.1.1.1 This chapter sets out why a significant capacity of new offshore wind generation is needed in the UK to support the delivery of the UK and Scottish Governments' Net Zero targets.

5.2 Electricity demand in the United Kingdom

5.2.1.1 GB electricity demand increased slowly in the 1990s and early 2000s. From 2005 to 2025 however, electricity demand has fallen year-on-year. Today's view of future GB electricity demand is one of returning growth, through:

- the switching of sources of final-use power for heating and transport from carbon intensive sources to electricity, the generation of which can be decarbonised using technologies already available today;
- the least-cost energy efficiency measures, such as introduction of low-voltage LEDs for lighting, have now been implemented across many business and domestic consumers;
- economic restructuring in GB away from manufacturing to a service-based economy has largely occurred, however the growth of new high-technology and highly skilled manufacturing, both contributing to national economic growth and prosperity, is likely to place additional pressures on the electricity sector.

5.2.1.2 The FES pathways achieve Net Zero through an increase in electricity demand which displaces fossil fuels as an energy source in many sectors. Consequentially, low carbon electricity supply will need to increase further to meet increasing electricity demand, including the potential for increased anticipated demand for green hydrogen, which could be produced using renewable electricity to electrolyse water with zero carbon emissions.

5.2.2 Annual electricity demand

5.2.2.1 The majority of industry projections of GB electricity demand to 2050 are for a significant increase from today's level of circa 300TWh. Note that 1TWh = 1,000,000MWh (one million megawatt hours). For comparison, the average consumption of a domestic property in GBis approximately 3MWh/Yr

5.2.2.2 The amount by which forecasts increase varies according to the level of decarbonisation of non-energy sector demand, and the source of that decarbonisation. For example, hydrogen is an important energy vector which may be able to help decarbonise hard to reach sectors of transport, space heating and heavy industry. Off-grid hydrogen production would require the generation of low carbon power, but this may not be allocated for within the transmission system demand projections for 2050 (i.e. in addition to the views included in the following list):

- Government's Clean Power Plan anticipated a doubling of demand by 2050, with rapid growth expected over the 2030s and 2040s (UK Government, 2024), p11;
- NESO presents a range from 559TWh for their counterfactual pathway to between 705 and 797TWh for the three Net Zero pathways (FES, 2025), Table 2;
- The Energy Systems Catapult forecasts 525 to 700TWh (ESC), pp23 & 27;
- The CCC's Sixth Carbon Budget presents a range from 550 to 680TWh [Ref 39, Table 3.4.a].

5.2.2.3 The increasing level of future demand is relevant to the need for low carbon generation capacity because sufficient capacity must be developed to meet that demand. Further, as demand on winter days could be much higher than that on milder days, the timing of periods of high demand and high supply will be important, as will building sufficient generation capacity to meet demand under a variety of weather conditions.

5.2.2.4 Figure 5.1 shows how NESO's GB electricity demand pathways developed from 2019 (prior to the UK's 2019 commitment to Net Zero), and from 2023 to 2025. Each annual pathway is represented

as a shaded area ranging from the lowest demand scenario to the highest scenario per delivery year, for those scenarios which met the 2050 climate targets of the time.

5.2.2.5 GB electricity demand pathways show a significant increase from earlier pathways. The increased electrification of transport, heat, and industrial demand is essential for the achievement of Net Zero and is a key driver for future increases in electricity demand.

5.2.2.6 Moving energy consumption from fossil fuels to low carbon electricity can also deliver cost savings. For example, the running costs of EVs are significantly lower than the running costs of petrol and diesel vehicles (Department for Transport).

5.2.2.7 Section 6.5 also explains that an increase in UK-based low carbon electricity generation provides price protection for GB consumers by shielding them from the effects of volatile international energy markets. Such a shield may also help encourage consumers away from fossil fuels and towards electricity in other sectors, for example home heating and cooking, providing that those supplies are plentiful, reliable and secure.

5.2.2.8 The range of demand provided by recent sources shows a shallow increase in GB electricity demand over the coming five years. Once electrification policies really start to take hold through the 2030s, electricity demand pathways then start to ramp up significantly until electrification is complete. In comparison to FES 2024 pathways, FES 2025 pathways favoured electrification over the use of hydrogen. An increase in forecast population growth and more tempered less optimistic views on energy efficiency improvements has led to higher electricity demands across all pathways compared to FES 2024. The GB electricity demand forecasts shown include the use of electricity in the production of hydrogen.

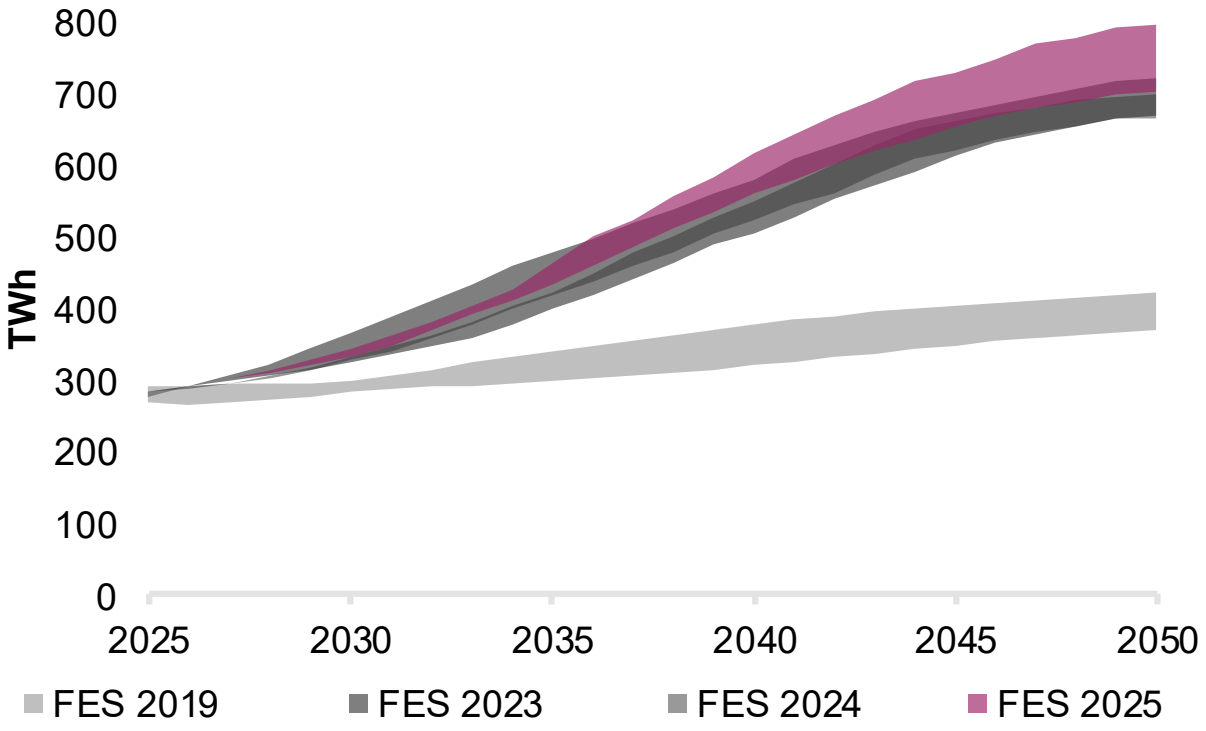

Figure 5.1: Evolution of GB electricity system demand projections (FES 2019, FES 2023, FES 2024 & FES 2025)

5.2.2.9 FES 2025 electricity demand pathways also increase the pace of switching to low carbon technologies versus FES 2024, with overall greater uptake of heat pumps and EVs alongside the

decarbonisation of industrial and commercial sectors. The use of hydrogen across multiple sectors is included but only in later years. Progress in 2024 and 2025 in developing hydrogen production in the UK has been slower than anticipated in the FES 2024 pathways.

5.2.2.10 Since the UK made its 2019 commitment to Net Zero, forecast GB electricity system demand in 2050 has converged towards 700TWh. Achieving Net Zero in the UK will require a significant increase in electricity demand, as shown in all recent Net Zero consistent FES pathways.

5.2.2.11 It is implicit that the trajectories shown in Figure 5.1 can only be met (and therefore Net Zero achieved) if there is sufficient operational low carbon electricity generation capacity to generate the low carbon energy demanded by consumers.

5.2.2.12 FES 2025 reports that, in 2024, consumer electricity demand was 267TWh. Generation from renewable, nuclear and other low carbon sources contributed 194TWh and unabated fossil fuel generation contributed 93TWh. Interconnector flows and system losses balanced supply with demand.

5.2.2.13 Consumer demand averages 310TWh in 2030 across the three Net Zero FES 2025 pathways, excluding electricity demand required for the production of hydrogen by electrolysis. Therefore, annual low carbon generation will need to increase by approximately 116TWh to deliver 'Clean Power by 2030'.

5.2.2.14 Consumer demand across the three Net Zero FES 2025 pathways averages 487TWh in 2040, again excluding electricity requirements for hydrogen production by electrolysis. Therefore, low carbon generation will need to increase by approximately a further 177TWh between 2030 and 2040 to keep power clean through the 2030s; electrolysis needs may increase this further.

5.2.2.15 Therefore, the magnitude of actions required over the period 2030 to 2035 to meet the UK's 2035 NDC, and over the 15 years following that to deliver full decarbonisation, will be at least similar to the magnitude of actions required over the period 2026 to 2030 to meet the UK's 2030 NDC. More actions will be required after 2030 to meet the 2035 NDC if the 2030 NDC is not met. And still more actions will be required after 2035 to meet subsequent NDCs and Scottish and UK legal obligations to achieve net zero by 2045 and 2050 respectively if the 2035 NDC is not met.

5.2.3 Peak electricity demand

5.2.3.1 The future daily profile of electricity demand is less easy to predict, but estimated peak demand (its highest instantaneous level) remains a key determinant of required installed generation capacity.

5.2.3.2 Figure 5.2 shows the range of peak GB electricity system demand (using NESO's Average Cold Spell methodology) from 2025 to 2050. In the three Net Zero pathways, peak demand is anticipated to range between 62GW and 65GW by 2030 (2023, for comparison, was 58GW); between 89GW and 103GW in 2040, and between 104GW and 119GW in 2050 (FES, 2025), Figure F.54.

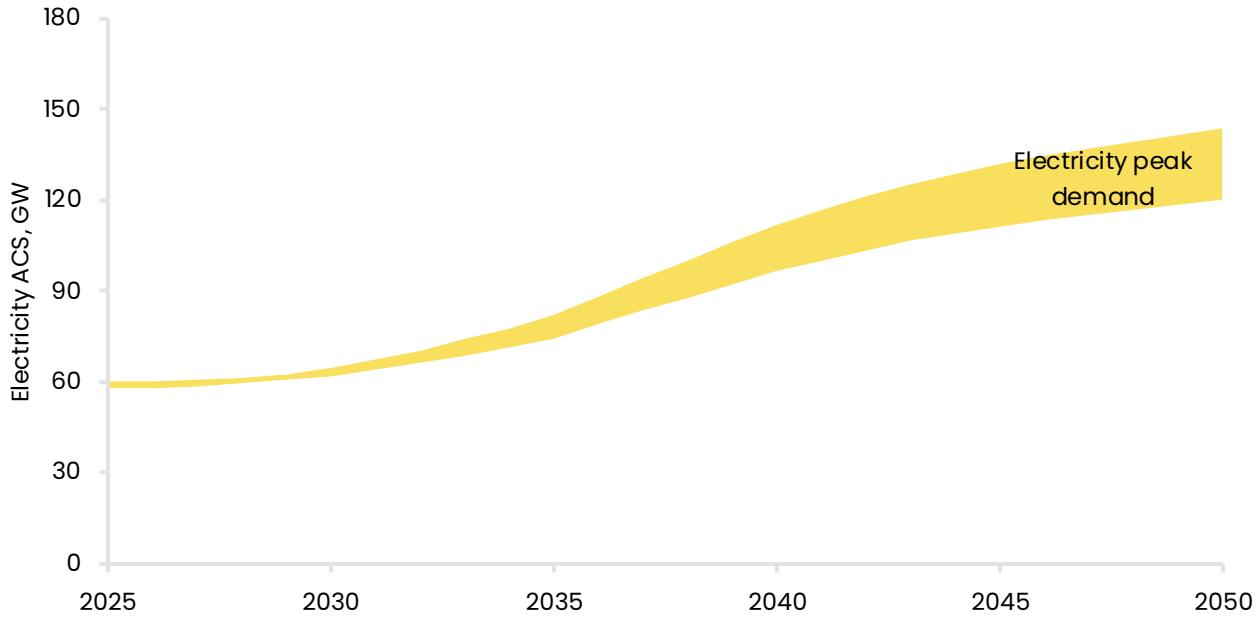

Figure 5.2: Average cold spell electricity system peak demand (GW, including losses, excluding station demand, exports and storage charging) (FES, 2025), Figure F.54

5.2.3.3 All FES 2025 Net Zero consistent pathways show an increase in peak demand from the late 2020s, driven by underlying industrial and commercial demand growth (through substitution of other energy sources) and the electrification of heating and transport.

5.2.3.4 Historically, electricity peak demand has tended to occur on winter weekday evenings, when industrial and commercial demand overlaps with residential. However, NESO stated that "as the share of renewable electricity supply increases, electricity peaks could occur at other times" (FES, 2024), p101.

5.2.3.5 EVs and hydrogen vehicles will require the deployment of additional electricity generation capacity and may also act as integration measures for renewable and baseload generation, capable of shifting load from when demand is high, to periods where supply is higher.

5.2.3.6 Sufficient electricity generation capacity will need to be deployed to be able to meet instantaneous demand, as well as forecast annual demand, under normal and unfavourable weather conditions, supporting the need for significant growth in UK low carbon electricity generation capacity.

5.2.3.7 In summary, the capacity of new low carbon schemes which will need to come online prior to 2030 to achieve 'Clean Power by 2030' is unprecedented. However, an even greater capacity of new low carbon schemes will need to come online in the 2030s to keep power clean through to 2040 and beyond, as the growing need to decarbonise other sectors is also met.

5.2.3.8 This provides evidence for the need for new low carbon generation facilities to continue to come online into the 2030s, to meet that anticipated growth in demand.

5.3 Electricity supply in the United Kingdom

5.3.1.1 Meeting the UK Government's Clean Power target means that clean power will be generated in sufficient quantities to meet the UK's total annual electricity demand, with carbon-emitting generation used as backup but used only when essential.

5.3.1.2 Government has established a target to deliver and sustain a Clean Power system (UK Government, 2024), p25.

5.3.1.3 Decarbonisation of the electricity sector, and the growth of that sector to enable electricity to be used to decarbonise other (non-traditional) sectors, is a key strategy to deliver wider decarbonisation in the UK. The decarbonisation of all sectors is essential for the UK to meet Net Zero (CCC, 2024a), p8.

5.3.1.4 Clean Power must be sustained year after year to ensure that carbon emissions from all sectors continue to reduce. This Statement of Need does not seek to justify or promote the exclusion of any generation technologies from the future GB generation mix.

5.3.1.5 Figure 5.3 shows historical electricity generation in the UK from 1996 to 2024 by fuel source, measured in TWh, and the resulting average grid carbon intensity, measured in gCO2(e)/kWh.

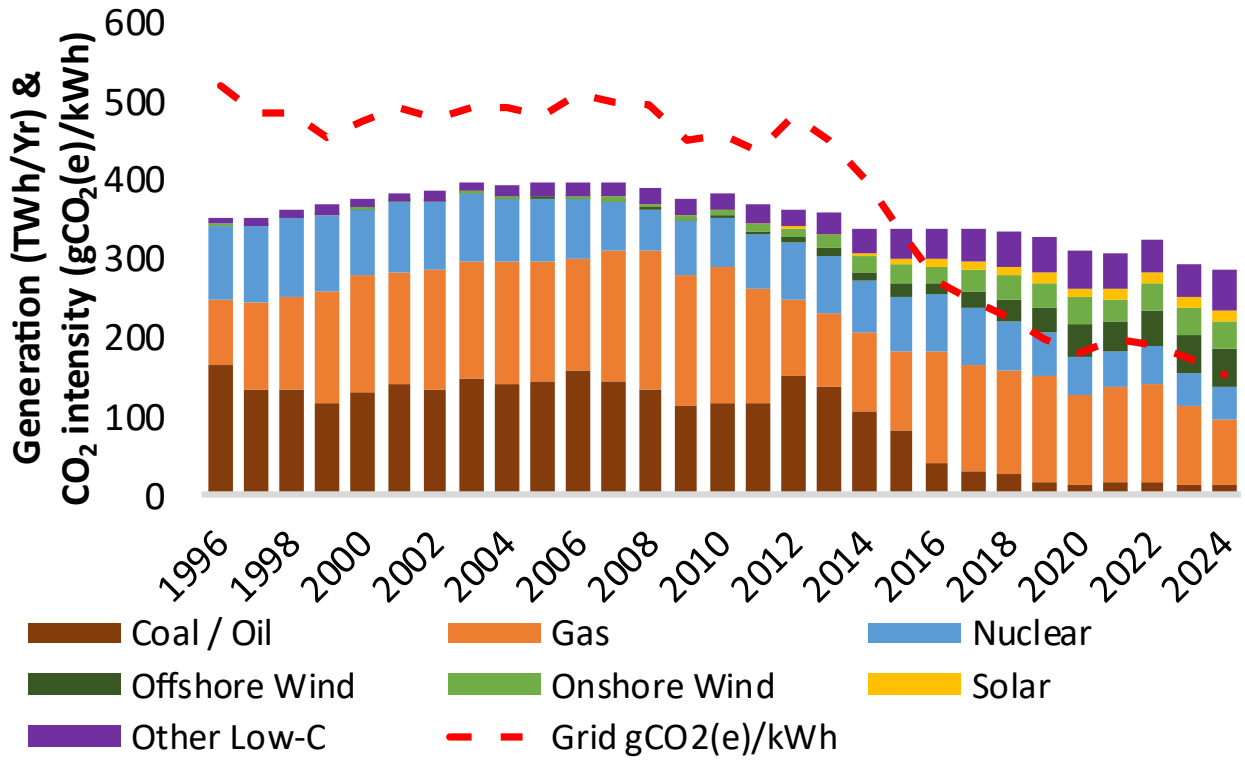

Figure 5.3: Historical annual electricity generation and carbon intensity (Generation: TWh/Yr. Carbon Intensity: gCO2(e)/kWh) (DESNZ, 2025e), Tables 5.6 & 5.14

5.3.1.6 Renewable generation, including renewable wind and solar, increased from near zero in 1996 to approximately 40% of UK generation in 2023 and 2024. Offshore wind generation in 2023 and 2024 averaged 49TWh/Year and is currently the second largest electricity generation technology in GB terms of annual output.

5.3.1.7 Figure 5.3 shows that generation from burning coal and oil reduced from approximately half of UK generation in 1996 to nearly zero in 2024. The last UK oil fired power station closed in March 2015 and the last coal fired power station closed in September 2024.

5.3.1.8 Nuclear generated over one-quarter of the UK's electricity needs in 1996 but contributed just 14% in 2023 and 2024 as existing plant have closed. Gas has contributed approximately 40% of UK

generation each year throughout much of the period shown but contributed just 35% in 2023 and 30% in 2024 as it has been replaced by renewable generation and imports.

5.3.1.9 GB Grid carbon intensity reduced from over 500 gCO2(e)/kWh in 1996 to 154 gCO2(e)/kWh in 2024, a reduction of 70%, while electricity generation reduced by just 19% over that period. (DESNZ, 2025e), Table 5.14.

5.3.1.10 The carbon intensity of the GB electricity system has reduced since 1996 due to a regulatory increase in the cost of emissions from high carbon intensity generation assets, the subsequent closure of British oil and coal fired power plants, and a significant increase in low carbon, low-marginal cost generation (predominantly wind and solar) since 2010.

5.3.1.11 As well as providing pathways for future national electricity demand, the FES provide pathways for how that demand could be met. Figure 5.4 shows electricity generation in the UK from 2025 to 2050 by source technology, measured in terawatt hours under NESO's 'Holistic Transition' pathway, and the resulting average grid carbon intensity, measured in gCO2(e)/kWh.

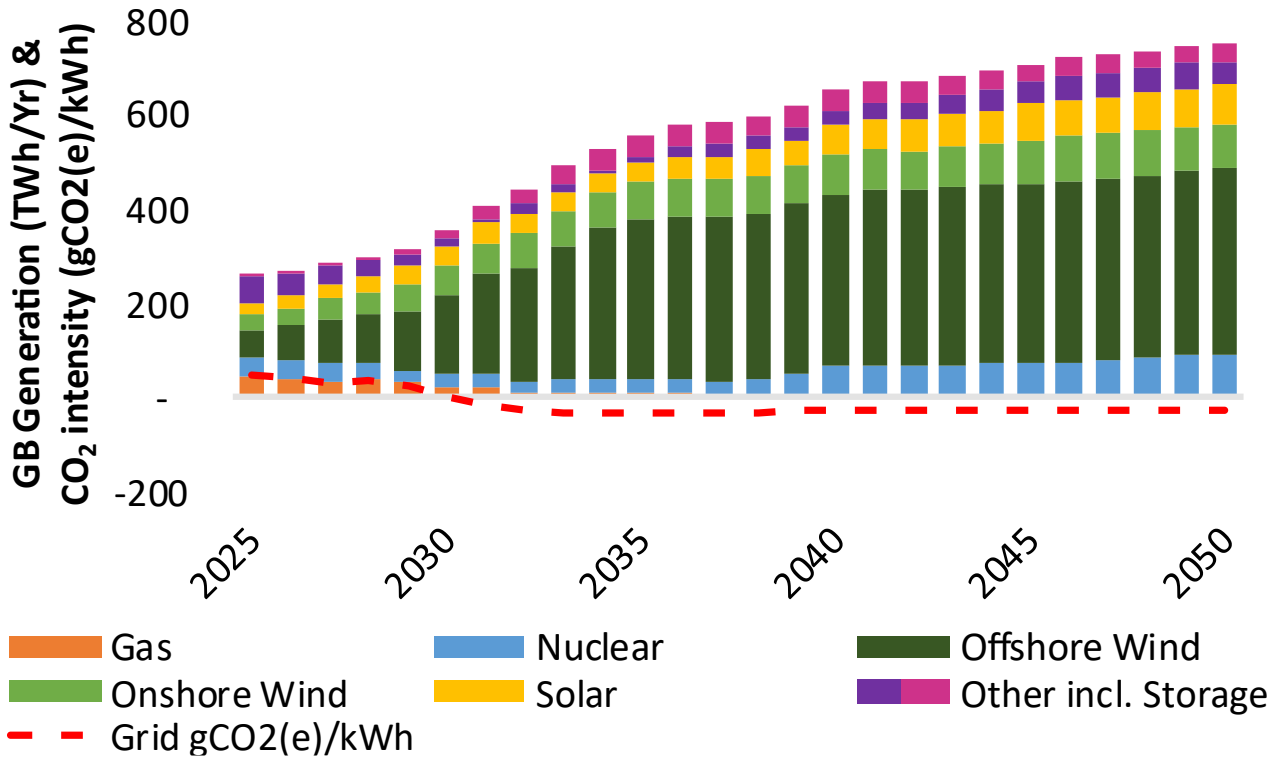

Figure 5.4: Projected electricity generation (TWh/Yr) and carbon intensity (gCO2(e)/kWh) (FES, 2025), Tables F.13 & ES1 – 'Holistic Transition'

5.3.1.12 The 'Holistic Transition' pathway shown in Figure 5.4 shows offshore wind generation increasing from 61TWh in 2025 to 397TWh in 2050. Nuclear generation more than doubles from 44TWh to 94TWh over the same period. Solar generation increases approximately four-fold, from 22TWh to 83TWh. In each of the three Net Zero consistent pathways, offshore wind generates in excess of 365TWh in 2050, demonstrating that offshore wind has a particularly important role as the backbone of the clean power system (UK Government, 2024), p13.

5.3.1.13 These low carbon generation sources, if delivered, will provide the much-needed electricity required to reduce grid carbon intensity from current levels to "well below 50gCO2e/kWh by 2030", aligned

with Government' Clean Power target (UK Government, 2024), p26. To achieve the Government's mission to deliver its Clean Power target, the roll-out of low carbon and negative carbon emissions generation will have to be similar in pace and scale to that included in NESO's current Net Zero consistent pathways.

5.3.1.14 Critically, grid carbon intensity in NESO's 'Holistic Transition' pathway reaches zero at the same time as unabated gas generation ceases. CCUS technology must be deployed at scale and integrated into the existing gas generation network, to enable gas technology to have a role in the future electricity system. Abated gas generation (i.e. gas plus CCUS) is included in the purple 'Other' category in Figure 5.4. Figure 5.4 also shows only the generation and not the power consumption of storage assets (e.g. Pumped Storage (Hydro), batteries and other energy storage technologies).

5.3.1.15 Figure 5.4 does not show either import or export interconnector flows. However, the UK is also pursuing a strategy of interconnection with other markets. Interconnectors are physical cables through which energy can flow in either direction. Market forces determine which direction the energy flows, from lower priced to higher priced markets. Interconnectors can therefore support energy security and affordability but leave markets vulnerable to international price shocks.

5.3.1.16 Interconnector imports (i.e. flows from abroad into Great Britain) can also displace GB-based fossil fuel generators from the grid and therefore help reduce the carbon intensity of the GB electricity system. However, interconnector imports do not directly contribute to the Clean Power target, which aims to ensure that the capacity of clean electricity sources in Britain is sufficient to meet annual British electricity consumption in normal weather conditions. For this reason, the Government is seeking clean GB-based generation to support its drive to achieve Net Zero.

5.3.1.17 As the Government's Clean Power Plan states: "By accelerating the switch to domestic renewable electricity sources and accelerating the application of clean electricity to the wider energy system, we will be able to reduce our reliance on fossil fuels faster. This enhances energy security, making the UK less vulnerable to global market disruptions or geopolitical tensions that affect energy prices" (UK Government, 2024), p21.

5.3.1.18 The UK has traditionally been an importer of energy from European markets, however NESO FES pathways show the UK to be a net exporter of energy from 2030. Interconnectors may still play an important role in the future in meeting UK electricity demand at certain times of the day or year.

5.3.1.19 The share of UK electricity generation which is to be met by offshore wind power is projected to increase from 23% in 2025 to between 45% and 52% by 2050 under all Net Zero pathways.

5.3.1.20 It is UK Government energy policy to "ensure that there is sufficient electricity to always meet demand; with a margin to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events" (DESNZ, 2023), Para 3.3.1.

5.3.1.21 The Government's Clean Power Plan also states that "Our 2030 mission will grow the UK's overall generation capacity and expand our network infrastructure so that we can safely and securely meet changing demand patterns in 2030 and beyond…" (UK Government, 2024), p24 by ensuring that by 2030 and in the years afterwards, in a typical weather year, "Clean sources produce at least as much power as GB consumes in total" (UK Government, 2024), p25. In 2025 the share was 64% (UK Government, 2026b).

5.3.1.22 The expected growth in electricity demand leads to a need for increased capacities of electricity generation. The national policy shift from dispatchable carbon-emitting generation to low carbon renewable generation also implies that electricity generation capacity must grow.

5.3.1.23 To improve the likelihood of being able to ensure system adequacy from renewable generators in all but the most unlikely of meteorological situations, a large capacity of interconnected assets from as broad as possible a range of technologies and geographies may be beneficial.

5.3.1.24 Figure 5.5 shows, for the same 'Holistic Transition' pathway, the significant increase in installed capacity of each technology required to meet the output projections shown in Figure 5.4 above.

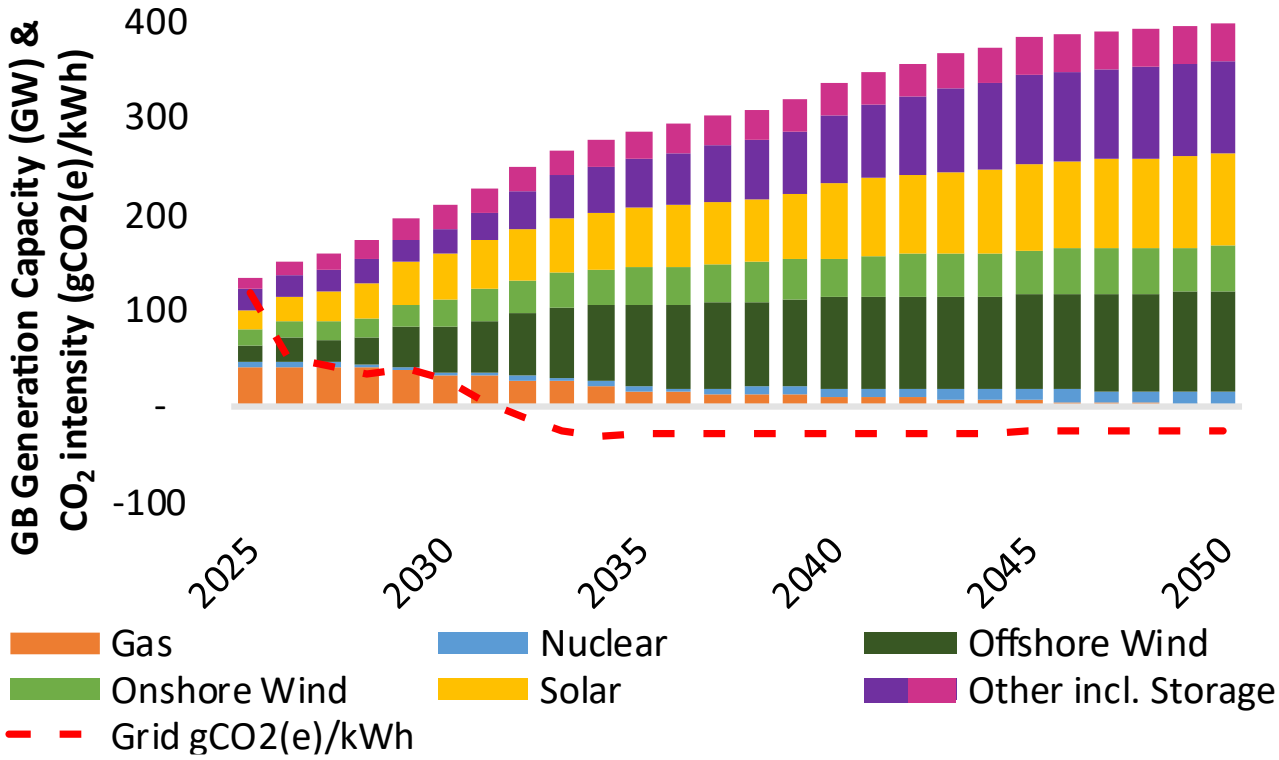

Figure 5.5: Projected electricity generation capacity and carbon intensity (Capacity: GW. Carbon Intensity: gCO2(e)/kWh) (FES, 2025), Tables ES.09 & ES1 – 'Holistic Transition'

5.3.1.25 Figure 5.5 shows that total electricity generation capacity must increase to approximately three-fold the current installed capacity in order to generate sufficient output to meet demand in 2050. The 'Holistic Transition' capacity pathway to 2035 is broadly consistent with the capacity ranges set out by the Government in its Clean Power Plan (UK Government 2024), Table 1.

5.3.1.26 The quantity of new generation capacity required in the UK to meet its Net Zero targets is enormous, and unprecedented in relation to capacity growth over any historical period. Yet different expert bodies such as the Energy Systems Catapult, and the National Infrastructure Commission, have provided similar and broadly consistent pathways ever since the Net Zero target was written into law in 2019.

5.3.1.27 UK energy policy advocates for a prudent approach, planning infrastructure development on a conservative basis "to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios" (DESNZ, 2023), Para 3.3.10. Prudence means not over-relying on technologies which are yet to be proven, have long development lead-times, or which have historically experienced funding difficulties. For this reason, NESO's pathways include major contributions from proven wind and solar generation rather than CCUS, hydrogen or new nuclear capacity. Government's Clean Power 2030 Action Plan is consistent with this fact (UK Government, 2024), Table 1.

5.3.1.28 Such an expansion of capacity across many technologies and over such long and concurrent timeframes, does not come without risk. It is very possible, if not probable, that one or more

technologies will miss their targets. This would increase the need for technologies which are successfully being deployed to accelerate their deployment further, in compensation.

5.3.1.29 Challenges to deployment may include international competition in supply chains, technology and labour markets. The Clean Power

5.3.1.30 Plan states that "we need to act – and act quickly – because 6 years is a short time in building energy infrastructure. We are not alone in wanting to rebuild our energy system and are competing with other countries for investment and to secure supply chains [and]… it can take over a decade to develop and build renewables projects" (UK Government, 2024), p18.

5.3.1.31 The need for new renewable electricity generation projects is urgent, and the continued delivery of low carbon generation facilities including offshore wind beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. It is also important to continue to bring forward schemes in case the decarbonisation progress to 2030 is slower than planned either through delays to renewable generation project delivery or attrition of projects from development pipelines.

5.3.1.32 Meeting the UK's Carbon Budget commitments requires a significant effort to reduce to near zero carbon emissions from electricity generation by 2035 at the latest, and a significant and sustained increase in the use of carbon free electricity in other sectors from the early 2030s onwards. Both requirements lead to the need for a full pipeline of offshore wind projects in the UK to contribute to the delivery of a carbon free electricity system and then to keep the electricity system carbon free as other sectors are electrified.

5.3.1.33 Therefore, all pipeline renewable generation projects are needed to help meet the UK's future carbon reduction commitments, whether they are targeting delivery in the 2020s or the 2030s. Constraining projects out of the pipeline limits the UK's future options on how to move at the pace required to ensure that the legal commitment to Net Zero by 2050 remains on track.

5.4 The role of offshore wind in the United Kingdom

5.4.1.1 The UK is a world-leader in offshore wind technology and the Government's Clean Power Plan capacity ranges seek to support the delivery of 43GW to 50GW of operational capacity by 2030, up from 14.8GW operational in Q2 2024 (UK Government, 2024), Table 1.

5.4.1.2 Government's FES-derived capacity range for offshore wind is 72 to 89GW by 2035 (UK Government, 2024), Connections Reform Annex (updated), Table 1.

5.4.1.3 None of NESO's FES 2025 pathways meet the Government's election manifesto target of quadrupling offshore wind capacity by 2030. Only one FES 2025 pathway meets the previous Government's 50GW target. This highlights the massive scale of offshore wind capacity required to achieve Net Zero. Of the three Net Zero consistent FES 2025 pathways, offshore wind capacity in 2030 ranges between 42GW and 48GW, generating between 143TWh and 178TWh of low carbon energy each year. Offshore wind pathway capacities rise to between 68GW and 86GW in 2035, generating between 267TWh and 342TWh each year, and rise again to 92GW to 94GW in 2040, generating between 362TWh and 367TWh each year.

5.4.1.4 Offshore wind is expected to produce a significant proportion of the UK's future low carbon electricity needs, however the Government's proposals take a multi-technology approach to the future electricity system, in part to increase security of supply during variable weather conditions.

5.4.1.5 Offshore wind is not tasked with meeting, and cannot be expected to meet, future UK electricity needs on its own. However, offshore wind has a particularly important role as the backbone of the clean power system (UK Government, 2024), p13.

5.4.1.6 Figure 5.5 shows FES pathway ranges for offshore wind capacity from 2019, 2023, 2024 and 2025, with each range shown as a shaded area covering the pathway with the lowest forecast capacity to the highest capacity in each year.

5.4.1.7 Figure 5.6 shows that the range of future offshore wind capacity for different FES pathways increased from FES 2019 to FES 2023.

5.4.1.8 The UK's Net Zero commitment in 2019 manifested in the FES pathways as a significant increase in offshore wind capacity, shown by the middle-tone grey range in Figure 5.6 (the 2023 forecast) being higher than the lightest grey 2019 forecast.

5.4.1.9 The range of pathways made in 2024 is narrower than the 2023 pathways and growth slows from the late 2030s in comparison to the 2023 pathway. The 2025 pathway is broadly consistent with the 2024 pathway, albeit with a slower ramp in capacity year-on-year through the late 2020s.

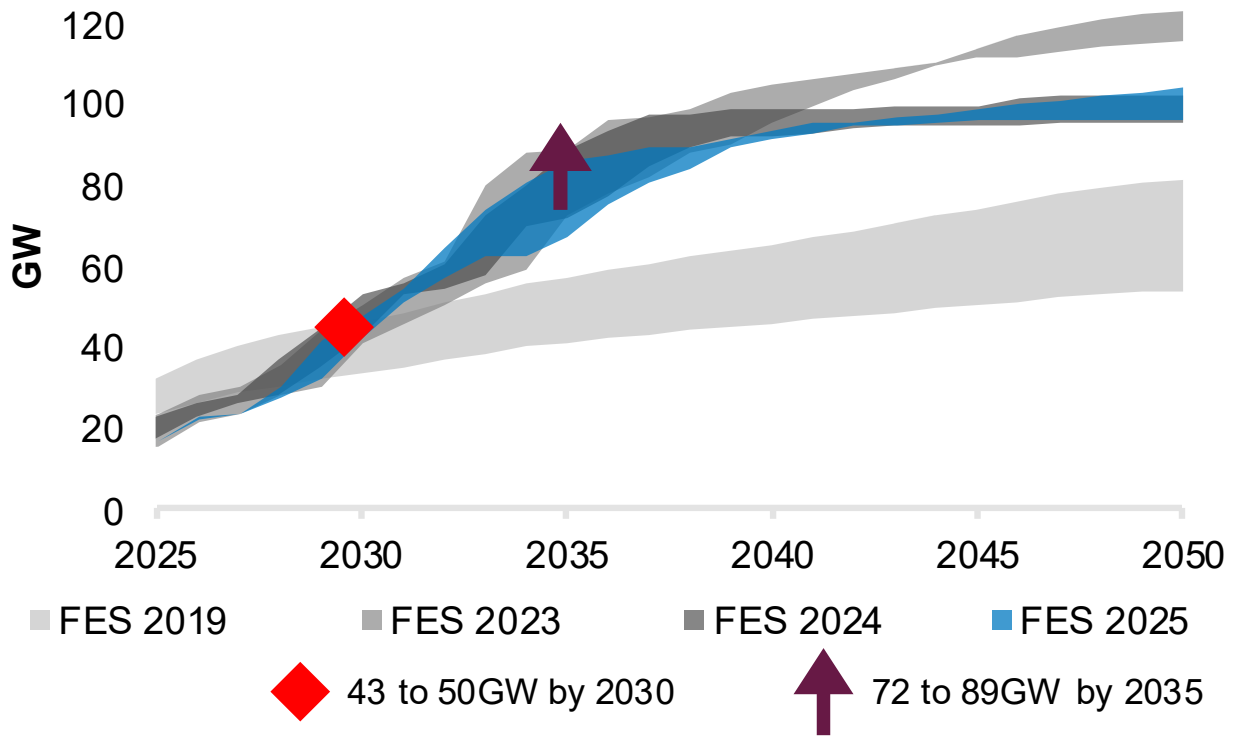

Figure 5.6: Current and potential future connected capacity of offshore wind technology (FES 2019, FES 2023, FES 2024 & FES 2025)

5.4.1.10 The purple arrow shows the top end of the 2035 capacity range and the red diamond shows the Government's 2030 capacity range for offshore wind capacity, both sourced from the Government's Clean Power Plan (UK Government, 2024), Connections Reform Annex (updated), Table 1.

5.4.1.11 The UK's current offshore wind pipeline shows great potential to deliver significant decarbonisation and energy security benefits. However, it is clear from recent scheme and contracting progress that delivery of the pipeline should not be taken for granted.

5.4.1.12 To achieve the top end of the 2035 capacity range, installations must exceed the most ambitious FES 2025 pathway over the next ten years.

5.4.1.13 To achieve the top end of the 2030 capacity range, an even more ambitious deployment rate is needed over the next five years.

5.4.1.14 NESO's Connections Reform process re-ordered the connections queue to prioritise those projects which are both more ready to proceed and strategically aligned with Government's capacity ranges. High-level results were published by NESO in December 2025 (NESO, 2025). They showed that offshore wind prioritisations have been made to the top of the 2035 national capacity range. NESO have stated that all offshore wind projects which were 'ready' at the time of their prioritisation are in the re-ordered queue.

5.4.1.15 The Applicant has been notified by NESO that Morven North has been prioritised as a Gate 2 Phase 2 project, with a connection window currently anticipated to be from 2031 to 2035 inclusive. However, at the time of submission of this Statement, NESO expect to communicate the firm connection date for Morven North to the Applicant in early 2027 (after consent applications will be submitted). This means that at present, the Applicant does not have a firm connection date for Morven North..

5.4.1.16 The important role that offshore wind is expected to play in reducing carbon emissions underscores the need for unprecedented capacities of offshore wind schemes to come forwards for delivery in the 2020s as well as to continue to come forwards for delivery in 2030 and beyond.

5.5 Electricity demand and supply in Scotland

5.5.1.1 NESO's FES do not provide an accessible regional breakdown of future electricity demand or supply pathways to Net Zero. However, the CCC does include high-level values of their modelling assumptions for Scotland's balanced pathway to Net Zero in Scotland's Carbon Budgets (CCC, 2025b).

5.5.1.2 The CCC's balanced pathway is for electricity demand in Scotland to nearly treble over the next 20 years from 21TWh in 2025 to 59TWh in 2045. (CCC, 2025b), Table 3.12. Key drivers of increasing demand are:

- An increase in the share of EVs in Scotland's car, van and HGV fleet, from below 5% in 2025 to circa 90% in 2045 (CCC, 2025b), Table 3.2;
- A doubling of annual industrial demand for electricity from 4.5TWh in 2025 to 10TWh in 2045, either directly or through the use of hydrogen as an intermediary energy vector (CCC, 2025b), Table 3.5;
- An increase in the share of domestic properties in Scotland with a low carbon electrified heating system (including heat pumps, heat networks and direct electric systems) from 10% in 2025 to 92% in 2045 (CCC, 2025b), Table 3.6, alongside energy efficiency and energy-saving practices reducing traditional electricity demand in the domestic sector;
- The balanced pathway also includes energy efficiency gains of 23-32% across commercial and public sector energy demand, as well as all heat demand for those sectors in 2045 being met by low carbon sources such as heat pumps, low carbon heat networks, electric resistive heating, and biomass boilers (CCC, 2025b), Table 3.8;
- Fuel switching from fossil fuels to low carbon hydrogen as well as reducing the carbon emissions associated with sourcing and refining fossil fuels through electrification and other methods. The CCC balanced pathway for low carbon hydrogen assumes that it is predominantly produced via electrolysis (93%) in periods where zero carbon electricity generation is surplus to demand requirements, therefore materially adding to electricity demand.

5.5.1.3 The CCC's balanced pathway shows electricity supply in Scotland to be completely decarbonised by 2030, however the amount of electricity generated will grow substantially out to 2045 to meet the UK Government's standards for security of supply and surplus electricity exported to the rest of the UK or stored and used to produce hydrogen from electrolysis.

5.5.1.4 The CCC state that "Renewables have an essential role to play in meeting Scotland's carbon budgets and the wider UK emissions targets" (CCC, 2025b), p92. Further, that:

"The capacity of transmission and distribution networks will need to be increased at pace to ensure supply is able to be transported to sources of demand as electricity generation is increasingly decarbonised and demand grows." (CCC, 2025b), p92.

5.5.1.5 While recognising that policy in the electricity supply sector is largely reserved, the CCC recommend the urgent approval of large-scale electricity infrastructure projects in Scotland. (CCC, 2025b), p94. In the CCC's balanced pathway, "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." (CCC, 2025b), p92.

5.5.1.6 The CCC notes Scottish plans to develop an additional 30GW of offshore wind capacity "over the next 10 to 15 years" (CCC, 2025b), p115 although it is noted that this ambition is lower than the ambition of up to 40GW of new offshore wind capacity by 2040 as stated in the Updated Scottish Offshore Wind Policy Statement (Scottish Government, 2026).

5.6 Development pipelines and attrition

5.6.1.1 Offshore wind developments in the UK are permitted only in areas of seabed which have been identified and allocated to potential developers by The Crown Estate or for developments in Scottish Territorial Waters or in Scotland's EEZ, by CES.

5.6.1.2 The Crown Estate's consultation document: Future of Offshore Wind considered that "running successive leasing rounds in the period out to 2030 would deliver the best value and opportunity for developers". However, "The timing and number of rounds, and the scale of each, remain under consideration" (The Crown Estate, 2024), p20.

5.6.1.3 The Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition (Scottish Government, 2026) underlines the commitment to delivering the existing project pipeline at scale, including all ScotWind and INTOG projects, resets the Scottish Government's offshore wind policy ambition to deliver up to 40GW of new offshore wind capacity by 2040, in addition to the already operational or consented capacity, and clarifies that no further offshore wind leasing rounds are planned in the near term.

5.6.1.4 Therefore, until any future lease rounds are held by The Crown Estate or CES, the pipeline of offshore wind projects in the UK must include only those which have been or may be granted seabed leases under Leasing Rounds 1 to 6 (including Round 1&2 extensions), Scottish Territorial Waters, 2017 Extensions, Test and Demonstration, ScotWind, INTOG and The Crown Estate's Capacity Increase Plan (2025). Any future leasing rounds may result in the award of capacity which could come online from the second half of the 2030s.

5.6.1.5 Although lists and registers provide important evidence towards current and future generation capacities, the listing of a project on any grid connection register, a planning database or a commercial contract register does not guarantee that the scheme will come forward at the scale and timeframes listed, if at all.

5.6.1.6 Delivering the many schemes with connection agreements in the late 2020s and beyond will be dependent on a significant number of onshore and offshore transmission network reinforcement works. The Clean Power Plan makes it clear that a significant amount of network development is required to facilitate connections to satisfy Government's 2030 and 2035 capacity ranges for offshore wind. The risks associated with delivering networks to accommodate these ranges should not be understated.

5.6.1.7 While it is not a given, there is potential for any network development delays to affect multiple offshore wind schemes. This is important because NESO's approach to offshore transmission

development is currently favouring a network of connections with transmission assets being shared by multiple schemes. Previously offshore transmission assets have been developed for individual schemes.

5.6.1.8 The benefit of NESO's revised approach is the opportunity to capture efficiencies in offshore infrastructure design, thus increasing the speed and reducing the environmental and financial cost of offshore infrastructure. However, the impact of a delay on the delivery of an offshore transmission development may be felt across more than one scheme.

5.6.1.9 In February 2023 NESO shared their analysis that "only 30-40% of projects in the [connections] queue make it to fruition" (NESO, 2023).

5.6.1.10 Scottish Renewables recommended a 30% MW attrition rate in their 2018 "An industry view of the Draft Sectoral Marine Plan for Offshore Wind" to reflect the more challenging conditions in Scottish Offshore Waters relative to the rest of the UK, particularly regarding water depth, ground conditions and grid charges (Marine Directorate, 2020), p31.

5.6.1.11 Of the 216GW of projects of all generation technologies (i.e. excluding storage) listed on Government's January 2026 Q4 Renewable Energy Planning Database (UK Government, 2026a), just 48.4GW are operational and 39.8GW will not move forwards due to having been refused planning consent, having been abandoned (by the developer), or their planning permission has expired.

5.6.1.12 Analysis of the CfD Register (LCCC) shows that even schemes which have achieved consent and a revenue contract are not guaranteed to be delivered. 88 schemes with CfDs have had their CfD terminated or have registered a reduction to the capacity of the CfD Unit (although in some cases mean the reduced capacity may come forward with other commercial arrangements):

- Offshore wind: five schemes (3,808MW) terminated, 1,512MW reduction on 25 schemes still going forwards, 32 schemes unchanged from contract award;
- Onshore wind, including Remote Island Wind: ten schemes (942MW) terminated, 102MW reduction on 16 schemes still going forwards, 56 schemes unchanged from contract award;
- Biomass / Waste / CHP / Advanced Conversion schemes: thirteen schemes (292MW) terminated, 25MW reduction on two schemes still going forwards, three schemes unchanged from contract award;
- Solar PV: fourteen schemes (429MW) terminated, 140MW reduction across 28 schemes still going forwards, 170 schemes unchanged from contract award.

5.6.1.13 Developers may elect to terminate CfD contracts for a variety of reasons, including change of ownership or commercial opportunities outside of the CfD framework. Reducing the capacity allocated to a CfD contract may also improve the commercial performance of a scheme under certain market conditions. However, the risk of non-delivery is higher for capacity which has not yet commenced its CfD contract, and which has dropped out of or been terminated from, its CfD contract.

5.6.1.14 The results of CfD Allocation Round AR7 were published in early 2026 and include 8.4GW of contracted offshore wind capacity, 1.5GW of which will be located in Scottish waters. These results, and those of CfD AR7a (for onshore technologies, announced in February 2026) are expected to be included on the CfD Register as Applicants sign contracts in 2026.

5.7 United Kingdom offshore wind pipeline analysis

5.7.1.1 Evidence for the need for a significant increase in the capacity of UK offshore wind generation is provided at Section 5.4 of this Statement, and Section 5.8 provides the same but for Scotland. This section analyses the current pipeline of projects in relation to that future need both in terms of total offshore wind capacity and when it might become operational.

5.7.1.2 The total offshore wind capacity projection set out in Figure 5.7 includes all projects which have been awarded leases and are either operational or are still progressing through development. This

includes projects from Leasing Rounds 1 to 4 (including Round 1&2 extensions), Scottish Territorial Waters, 2017 Extensions, Test and Demonstration, ScotWind and INTOG rounds. Offshore Wind Leasing Round 5 for floating offshore wind in the Celtic Sea is underway. Leases for two of three sites were signed in October 2025 and the third was signed in March 2026. Total Leasing Round 5 capacity is up to 4.5GW. CfD AR7 results have been included in this analysis.

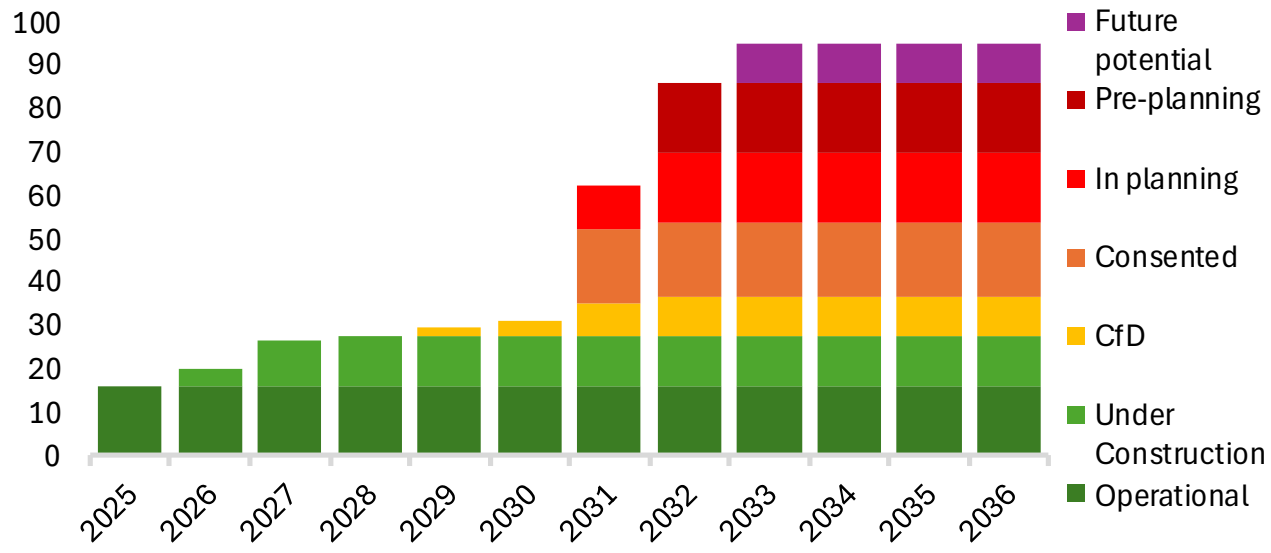

Figure 5.7: Modelled future commissioned offshore wind capacity (Great Britain, fixed bottom and floating) (GW), (TCE & CES data, REPD, TEC)

5.7.1.3 In May 2025, the Secretary of State for Energy & Net Zero agreed with a recommendation previously brought forward by The Crown Estate (TCE) that projects located in seven areas of seabed already under agreement to offshore wind developers (Capacity Increase Programme (CIP) projects) be granted permission to proceed, on the basis of a derogation to the Habitats Regulations (2010), with compensation measures to address the impact on marine habitats and species:

"As a significant amount of new renewable energy infrastructure is needed to meet the fifth and sixth carbon budgets and our legally binding target to achieve Net Zero by 2050 under the Climate Change Act 2008, I am satisfied that … all the projects within the CIP are necessary in order to meet the significant need for new offshore wind infrastructure and to combat climate change" (DESNZ, 2025f).

5.7.1.4 CIP Plan projects have therefore also been included in this analysis at their full potential capacity, totalling an increase of c.4.5GW on previously agreed capacities.

5.7.1.5 Offshore wind projects have been classified according to their development status. This has been informed by data from TCE and CES matched with data from the government's Renewable Energy Planning Database (UK Government, 2026a) and from NESO's Transmission Entry Capacity (TEC) Register (TEC, 2025). Other market information has also been used to supplement this data. The classification categories are:

- Operational: already fully commissioned. No capacity degradation is assumed in future years. A total capacity of 16.1GW.

- Under Construction: includes capacity currently operating but not yet fully commissioned. Developer updates have been used to assess when these projects will fully commission. A total capacity of 11.4GW[2].
- CfD: this capacity has secured a CfD contract but has not yet started construction. Full commissioning has been assumed to occur 5 years after CfD award, or the published connection date, whichever is later. A total capacity of 9GW[3].
- Consented: projects which have achieved consent are assumed to apply for a CfD in the next available round (currently, annually). Full commissioning is assumed to occur 5 years after CfD award, or the TEC connection date, whichever is later. A total capacity of 17.3GW[4].
- In planning: All fixed bottom projects currently in planning have been in planning for more than one year and are therefore assumed to be eligible to bid in the next CfD Allocation Round AR8. All fully or partially floating projects currently in planning are assumed to exit planning with consent in time to bid in CfD AR8 (assumed 2026) or CfD AR9 (assumed 2027). Projects then proceed with the same development pathway as consented projects from CfD to commissioning. A total capacity of 16.1GW[5].
- Pre-planning: all capacity in pre-planning (a total of 16.3GW[6]) is assumed to exit the planning process with consent in time to bid in CfD AR9 and then proceed with the same durations as Consented projects from CfD to commissioning.
- Future potential: All future potential capacity (9.2GW[7], which includes the R5 Celtic Sea leasing round potential of 4.5GW) is assumed to exit planning in time to bid in the 2028 CfD round (AR10) and then proceed with the same durations as Consented projects from CfD to commissioning.

5.7.1.6 The Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition (Scottish Government, 2026) clarifies that no further offshore wind leasing rounds are planned in the near term and therefore any future leasing rounds would be unlikely to result in capacity which is operational prior to the mid-2030s because of the timeframes involved.

5.7.1.7 By comparing already operational capacities and current capacity assumptions, 4.9GW of net attrition has occurred versus lease award capacities for projects which are under construction or have been awarded CfDs (41.4GW). This is equivalent to an attrition rate of 11.9%.

5.7.1.8 For those projects which have made it through to operation (16.1GW), average timescales for development and construction (at a year-granularity) were:

- Lease award to planning consent: 4 to 5 years;
- Planning consent to operation: 4 to 5 years. Larger, more recent projects have taken 1 to 2 years longer;
- A total development duration from lease award to full commercial operation of over 9 years.

[2] Dogger Bank A, Dogger Bank B, Dogger Bank C, Sofia, Hornsea 3, East Anglia 2, East Anglia 3, Inch Cape (Scot, 1.1GW).

[3] GreenVolt (Scot, 0.6GW) and AR7 awards to Awel y Môr (incl. CIP expansion), Berwick Bank B (Scot, 1.4GW), Dogger Bank South East, Dogger Bank South West, Norfolk Vanguard East, Norfolk Vanguard West, Erebus and Pentland (Scot, 0.1GW).

[4] Seagreen 1A (Scot, 0.5GW), Berwick Bank (Scot, 2.7GW), Hornsea 4, East Anglia 1 North, Norfolk Boreas, Rampion 2 (incl. CIP expansion), , Sheringham Shoal (incl. CIP expansion), Dudgeon (incl. CIP expansion), Galloper & Five Estuaries CIP extension, Mona, Morecambe, Morgan, Outer Dowsing, West of Orkney (Scot, 2GW), White Cross, Salamander (Scot, 0.1GW), ForthWind.

[5] Greater Gabbard (North Falls), Ayre (Scot, 1GW), Buchan (Scot, 1GW), Caledonia (Scot, 2GW), MarramWind, Muir Mhòr (Scot, 0.8GW), Ossian (Scot, 3.5GW), Aspen (Scot, 1GW), Cenos (Scot, 1.4GW), Culzean (Scot, just 3MW).

[6] Arven, Arven South, Bellrock, Bowdun, Broadshore, Havbredey, MachairWind, Morven, Spiorad na Mara, Stoura, Stromar, Talisk (All Scot, a total of 14.3GW), and Dogger Bank D.

[7] Gwynt Glas, Ocean Winds, Equinor (Irish Sea), CampionWind Blyth Demonstration Phases 2&3, Beech, Cedar, Flora, Judy, Malin Sea Wind, Scaraben, Sinclair (All Scot, a total of 4.4GW) and Llyr 1 & 2.

5.7.1.9 This compares to assumptions made by the Department of Energy Security and Net Zero (DESNZ) (Electricity Generation Costs 2025) for a reference 1.3GW project:

- Pre-development period: 7 to 15 years (medium: 7 years);
- Construction period: 2 to 5 years (medium: 3 years);
- A total pre-development and construction period of 9 to 20 years (medium: 10 years).

5.7.1.10 This analysis provides quantifiable evidence that:

- There has been attrition to date (so attrition should be expected in the future);
- Government's current medium project development assumptions now reflect recent industry experience.

5.7.1.11 The following assumptions have been made in producing this analysis.

- No further attrition. Whereas net offshore wind attrition has been 11.9% of initial capacity estimates at lease award for projects which have made it through to fruition.
- No failures or delays at CfD award stage. The CfD allocation rounds are competitive so it should be expected that some projects are not awarded CfDs on their first attempt. For example, no CfD contracts were awarded to offshore wind projects at CfD AR5 (2023). Subsequent attempts may be successful, but each unsuccessful attempt would incur at least one year of delay.
- No delays to project development project timelines. Project development progresses in line with historically achieved duration assumptions for construction phases with a duration of 5 years from CfD award to operation. The data also shows that projects which have already delivered took on average 9 years versus DESNZ's updated medium assumption of 10 years from lease award to operation (i.e. including pre-planning activities).
- No construction constraints. Europe is planning to construct significant capacities of offshore wind through the late 2020s and early 2030s so European supply chain or construction resources and raw materials may be constrained, delaying construction start or extending construction timelines.

5.7.1.12 The analysis shows that by assuming full delivery of all capacities listed at Paragraph 5.7.1.5 and delivered according to the assumptions set out at Paragraph 5.7.1.11, fully commissioned offshore wind capacity may increase from its current level of 16.1GW to a maximum of 29.6GW by year end 2029 and a maximum of 31.3GW by year end 2030.

5.7.1.13 Based on current project status and development timeframes with i.e. zero capacity attrition and zero delivery delays versus the timing assumptions set out at Paragraph 5.7.1.11, the capacity of offshore wind operational by 31 December 2030 may reach 31.3GW, 11.7GW lower than the lower bound of Government's capacity range for 2030 (43GW).

5.7.1.14 Further, that the same assumptions indicate that this capacity could be almost fully operational by the end of 2033. However, it is necessary to note the following achievements are all pre-requisites for installed capacity to reach the bottom of the UK Government's 2035 FES-derived capacity range (72GW) by 31 December 2035:

- The delivery of all 11.4GW of offshore wind currently under construction;
- Construction commencing and completing on the one offshore wind project with a CfD where construction has not yet commenced to deliver the full (9GW in this category);
- Achieving financial close on all 17.3GW of currently consented projects before the end of 2030 such that construction can complete by the end of 2035;
- The grant of planning consent and achieving financial close on all 16.1GW of projects currently in planning such that construction can complete by the end of 2035;
- Approximately ten percent of all projects currently in pre-planning or future potential (2.3GW of a total of 25.4GW) securing planning consent and achieving financial close such that construction can complete by the end of 2035.

5.7.1.15 Although the same assumptions indicate that, before pipeline attrition, the capacity of offshore wind operational by 31 December 2030 could reach 62.3GW, this projection would require an unprecedented 31GW of offshore wind delivery in 2030 alone. Historical delivery rates provide evidence that this level of capacity delivery is highly likely not to be achieved.

5.7.1.16 The analysis also shows that the total capacity of offshore wind projects in the UK before attrition is 95.1GW, i.e. only 6GW higher than the top of the UK Government's 2035 FES-derived capacity range and only 1GW higher than the highest NESO FES 2025 Net Zero compatible pathway for 2040 installed capacity.

5.7.1.17 These pre-requisites are a significant undertaking and are all more ambitious than any progress made in the development of offshore wind in the UK to date. Further, they must all be achieved otherwise installed offshore wind capacity in 2035 will be below the UK Government's FES-derived range, requiring more projects to come forwards to make up for capacity shortfalls in the 2030s.

5.7.1.18 This data shows that an unprecedented scale and pace of actions is required from now, through 2030 and beyond at every step of the development process to deliver Government's offshore wind Clean Power Capacity Range. Other technologies have similar challenging capacity ranges to reach to sustain a successful pathway to clean power and Net Zero. Yet, such a scale and pace of development has not been achieved before in the UK in any generation technology.

5.7.1.19 It is therefore possible that some technologies will fall short of their capacity ranges, requiring other technologies to over-deliver to achieve a clean power system. If any technologies other than offshore wind fall short of their capacity ranges, offshore wind capacity may need to exceed the top of the UK Government's 2035 FES-derived capacity range (89GW) by 31 December 2035. To do so would require not only all of the actions listed above to be delivered, but approximately three-quarters of the remaining pre-planning or future potential capacity would also need to be delivered, achieving a MW attrition rate of just 6.5% across all current leased capacities.

5.7.1.20 Put another way, to achieve the top of the UK Government's 2035 FES-derived capacity range (89GW) by 31 December 2035 would require:

- 35.3GW of new capacity to be granted planning consent in the next five years (7.1GW/year) when consents have averaged just 4.3GW/year since 01 January 2022;
- 52.5GW of new Contracts for Difference to be awarded in the next six years (8.9GW/year) when CfD awards have averaged just 3.2GW/year since 01 January 2022;
- 72.9GW of offshore wind built in the next ten years (7.3GW/year) when construction has averaged just 1.1GW/year since 01 January 2022.

5.7.1.21 Therefore, a prudent approach would be to assume that not all of the capacity identified in TCE and CES current and future seabed lease awards will deliver to the timeframes indicated, and some may not deliver at all.

5.7.1.22 Projects listed on the TCE and CES registers cannot be considered as viable alternatives to Morven North because they cannot be assumed to deliver to the same timeframes, if at all. Further, the capacity of operational projects needed before 2035 is significantly higher than the capacity of projects likely to deliver within the same timeframes, therefore all projects which can deliver in the 2030s (including Morven North), either to meet the 2035 capacity range, or to meet future capacity ranges, whether or not to compensate for shortfalls in meeting previous capacity ranges, should be considered as being needed in addition to, as opposed to instead of projects which have already been prioritised for connection by NESO.

5.7.1.23 This analysis indicates that without Morven North, the shortfall in delivered offshore wind capacity versus UK Government aims would be even greater than it currently appears to be, especially in the period beyond 2030 during which growth in low carbon electricity generation capacity is required to enable and unlock carbon emission reductions in other sectors.

5.7.1.24 The capacity of offshore wind required to be delivered in the next decade is likely to be higher than current projections and, in that context, all projects, including Morven North, which are currently under development and with a seabed lease with TCE or CES, are needed.

5.8 Scottish offshore wind pipeline analysis

5.8.1.1 The updated Scottish Offshore Wind Policy Statement (Scottish Government, 2026), sets out the Scottish Government commitment to maximise the deployment of offshore wind in Scotland, by resetting its ambition and aiming for the development of up to 40GW of new offshore wind capacity by 2040.

5.8.1.2 Figure 5.8 is comparable to Figure 5.7 except that the projects shown are only those located in Scottish waters.

5.8.1.3 The data shows that current operational installed offshore wind capacity in Scotland is 4.3GW. A further 1.1GW is under construction; 2GW has secured a CfD (but construction has not yet started) and 5.3GW has been consented but has not yet secured a CfD.

5.8.1.4 The analysis indicates that at most 6GW of offshore wind will likely be connected by 31 December 2030, but up to 20.4GW may be connected by 31 December 2031 if all projects deliver to their current capacity and timeline assumptions. However, as with the UK position shown in Figure 5.7, historical delivery rates provide evidence that this level of capacity delivery is highly likely not to be achieved.

5.8.1.5 The analysis also shows that the total capacity of offshore wind projects in Scotland before attrition is 45GW, i.e. 5GW higher than the Scottish Government's updated 2040 ambition. However, 0.4GW of net attrition has occurred versus lease award capacities for Scottish projects which are under construction or have been awarded CfDs (7.8GW). This is equivalent to an attrition rate of 5%.

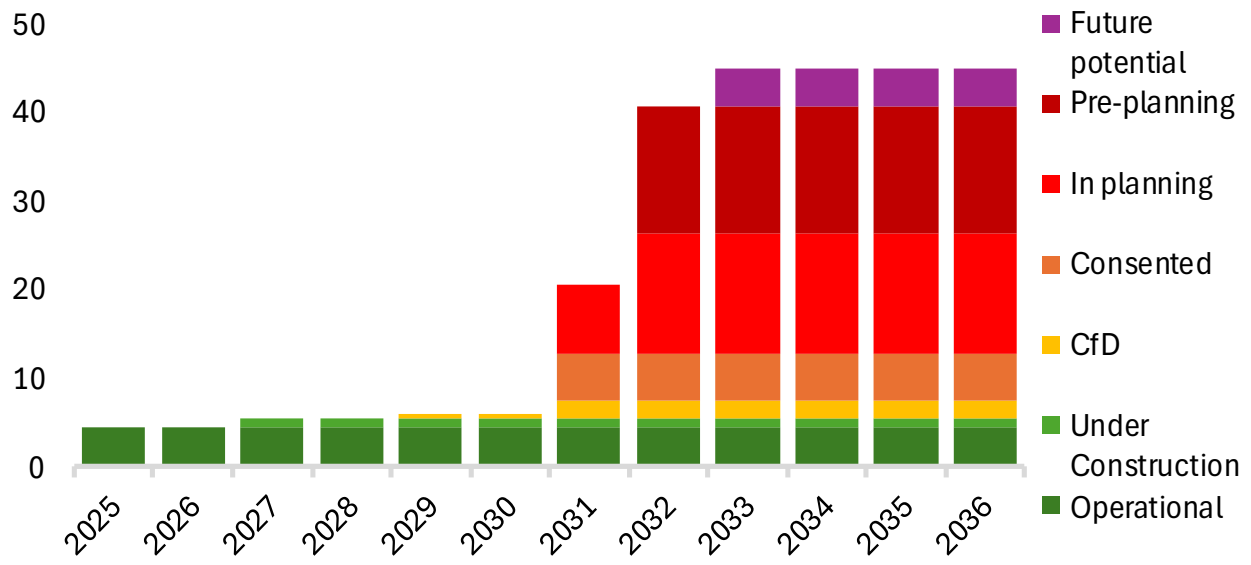

Figure 5.8: Modelled future commissioned offshore wind capacity (Scotland, fixed bottom & floating) (GW), (TCE & CES data, REPD, TEC)

5.8.1.6 To meet the Scottish Government's updated ambition, Scottish offshore wind pipeline projects would require:

- 27.2GW of new capacity to be granted planning consent (84% of a total of 13.7GW currently in planning, 14.2GW in pre-planning, and 4.4GW of 'future potential' (IN/TOG) capacity);
- 32.6GW of new Contracts for Difference to be awarded, nearly five times the capacity of CfD awards to Scottish projects to date (7.4GW);
- a total of 35.7GW of new capacity constructed (including the completion of 1.1GW currently under construction), equivalent to a minimum of 2.4GW every year from 2026 to 2040, compared to a historical Scottish average annual construction rate of 0.7GW over the last five years.

5.8.1.7 This analysis is consistent with the previous UK-level analysis. It demonstrates the enormous magnitude of the task ahead of Scotland to meet its updated offshore wind capacity ambition, particularly in the development of projects to the planning consent stage, to secure the pipelines of projects with the potential to deliver before 2040.

5.8.1.8 In this regard, Morven North which in combination with Morven South could deliver a seabed lease capacity of 3GW across the whole Morven Site, is a significant opportunity to deliver a meaningful contribution towards Scotland's offshore wind capacity aims. To disregard Morven North would be to increase the risk of Scotland falling short of its updated offshore wind capacity aims, and therefore also risk falling short of its carbon emissions reduction trajectory towards Net Zero in Scotland in 2045.

5.8.1.9 Further, of the total capacity of schemes listed (45GW), over one-half (26.3GW) are partially or fully floating offshore wind schemes with most delivery assumed to be from 2032 onwards.

5.8.1.10 Floating offshore wind is an exciting and important technology which has already achieved success in demonstration, pilot and smaller scale schemes in Scottish waters and elsewhere. However, as a nascent technology, its delivery at scale and in deeper waters, further away from shore, has not yet been achieved.

5.8.1.11 Therefore, the development and connection of fixed bottom schemes, which are by contrast proven in delivery at the size and scale and in similar locations as Morven North can be assessed as a lower-risk approach to delivering offshore wind capacity ahead of and alongside floating offshore wind.

5.8.1.12 This analysis also demonstrates the importance of Scottish offshore wind to the achievement of UK offshore wind targets.

6 Need for offshore wind and summary of benefits arising

6.1 Introduction

6.1.1.1 The development of new capacities of offshore wind delivers benefits to the three fundamental UK energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering Net Zero carbon emissions by 2050.

6.2 Carbon emission reductions

6.2.1.1 Key elements of the UK Government's strategy to reach Net Zero are to decarbonise the electricity system and to substitute carbon intensive fossil fuels with low carbon sources of energy both within and out with the electricity sector.

6.2.1.2 Large-scale offshore wind facilities will produce significant quantities of low carbon electricity which will support decarbonisation of the UK's electricity system.

6.2.1.3 Further, the electricity generated by offshore wind facilities can be used directly to decarbonise other sectors. The generation of sufficient quantities of low carbon electricity to meet demand from other sectors is a key requirement of the CCC's balanced pathway for Scotland's Carbon Budgets.

6.2.1.4 Electricity produced by offshore wind facilities which are connected to the national electricity system could be used to electrolyse water to produce hydrogen with no carbon emissions. That hydrogen could then be transported to meet end-use demand, or stored for later use, including to generate low carbon electricity in hydrogen turbines or industrial facilities when renewable supplies are insufficient to meet demand.

6.2.1.5 Grid-connected offshore wind facilities therefore may also indirectly support low carbon flexible electricity generation and the decarbonisation of harder to reach sectors such as industrial demand, heavy transport and home heating.

6.2.1.6 Figure 5.4 of this Statement shows NESO's Holistic Transition pathway which includes approximately 380TWh of offshore wind generation in the UK in 2045, alongside approximately 170TWh in combination from onshore wind and solar. The CCC's balanced pathway key indicators are for approximately 210TWh of renewable generation in Scotland (i.e. offshore and onshore wind and solar) in 2045, demonstrating the importance of Scottish renewable generation, including offshore wind, to total UK low carbon generation.

6.2.1.7 This is an important point because it provides evidence to support the scale of offshore wind facilities needed in Scotland and in the UK to meet Net Zero across all end-use sectors.

6.2.1.8 The analysis at Section 5.7 and Section 5.8 of this Statement shows that there is a significant risk to the timings and quantum of delivery of the Scottish and UK pipelines for offshore wind, even before the effects of attrition on that pipeline are considered.

6.2.1.9 Therefore, given the urgent and unprecedented need for low carbon generation and for offshore wind in particular, the schemes currently listed on Scottish and UK pipelines cannot be considered as alternatives to Morven North. This is because many pipeline schemes may not come forward at all. Or, if they do come forward, they are likely to be needed as well as Morven North, rather than in its place.

6.3 Secure energy supplies

6.3.1.1 Reducing Scotland's and the UK's dependency on hydrocarbons has important security of supply 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

potentially volatile foreign hydrocarbon supplies. The development of offshore wind facilities in Scotland is important for Scottish and UK electricity security of supply and the affordability of energy.

6.3.1.2 An increase in Scottish wind generation capacity will help to sustain Scotland's low carbon electricity supply through a wider range of weather conditions.

6.3.1.3 It will also help to increase the maximum level of wind generation available on the UK's electricity system at any one time, therefore increasing the proportion of UK electricity demand met by home-grown, low carbon generation, during periods when demand is highest.

6.3.1.4 The UK's Clean Power target is for over 95% of annual UK electricity demand to be met by UK-based low carbon generation. Accelerating the switch to domestic renewable energy sources and achieving the Clean Power target will enhance energy security (UK Government, 2024), p21.

6.4 Lower traded wholesale electricity costs for consumers

6.4.1.1 In the UK power market, generators schedule output in response to whether a market price signal for a specific period is above or below their marginal cost of generation. The marginal cost of generation is defined as the input fuel, carbon emissions, and other variable costs of generating one additional MWh.

6.4.1.2 Renewable generation has very low or zero marginal costs and therefore renewable assets generate as much power as they are able to, when they are available (i.e. whenever the wind is blowing or there is sunlight) and whenever power prices are positive.

6.4.1.3 The marginal cost of generation for conventional assets is higher than zero because of input fuel and carbon emissions costs. Conventional assets only generate when the market price is higher than their marginal cost of generation.

6.4.1.4 UK power is a 'pay as clear' market, meaning that the price of power is set at the marginal cost of the most expensive asset needed to meet demand for the period in question. If input fuel costs increase, marginal costs increase, and the price of power therefore also increases.

6.4.1.5 This is shown in simplified form in Figure 6.1. The shaded area shows the capacity of assets (x-axis, increasing) against the marginal cost of generation (y-axis). This is called the 'stack'. Renewable assets are to the left of the stack, at a zero marginal cost of generation (the light blue shaded area does not go higher than the line y = 0). Conventional assets are in the middle. The mid-blue shaded area shows that some assets have lower marginal costs than others and so will generate ahead of more expensive assets. Peaking assets, with very high marginal costs, are to the right of the stack.

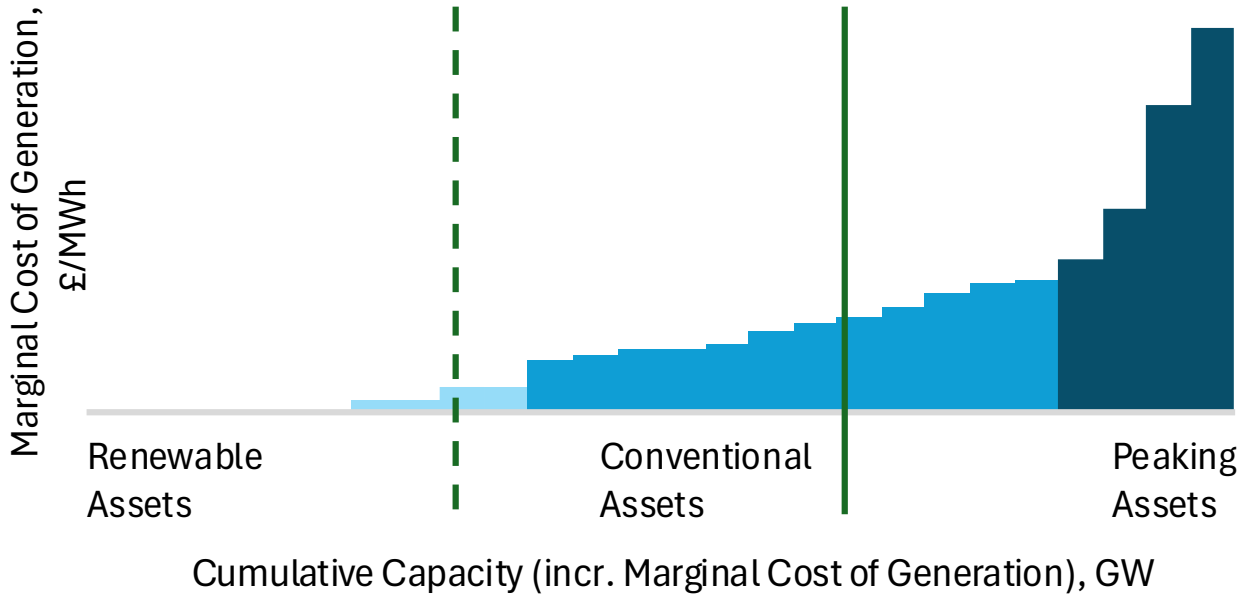

Figure 6.1: The marginal cost of generation sets the UK's price of electricity

6.4.1.6 The green vertical lines represent levels of electricity demand. As demand increases, e.g. from the dashed to the solid green line, assets with increasingly expensive marginal cost of generation schedule themselves to meet demand, and market price increases. As demand falls (the green line moves to the left), assets fall 'out of the money' (i.e. generation costs exceed market revenues) and stop generating. Market price therefore decreases to that set by a different asset with a cheaper marginal cost of generation.

6.4.1.7 Increasing the output of renewable assets reduces the traded price of power. As renewable generation output increases, more electricity is generated at a zero marginal cost (the 'zero height' portion of the x-axis increases in length). For a fixed level of demand (i.e. a static green vertical line), the most expensive assets stop generating, leaving cheaper units to set the price of power.

6.4.1.8 The competitive marginal cost of generation of offshore wind facilities, indicate that consenting such facilities, including Morven North, would be likely to help to reduce the UK's average traded wholesale electricity costs.

6.5 Shielding consumers from volatile international energy markets

6.5.1.1 An electricity system which is largely independent of fossil fuels is urgently needed not only to deliver decarbonisation, but also to shield consumers from high and volatile energy prices, including those arising from geopolitical influence.

6.5.1.2 Volatile international energy markets impact the cost of fuel used in carbon-emitting generation. If international energy prices increase, fuel costs increase, and the marginal cost of carbon-emitting assets will also increase. This effect is seen in the UK's electricity price, when carbon-emitting generators are providing energy to the UK's electricity system.

6.5.1.3 This is because carbon-emitting assets require an input fuel (e.g. gas, and the cost of that fuel must be included in the generator's marginal cost of generation). The cost of the carbon emitted must also be included in the generator's marginal cost of generation.

6.5.1.4 As the Government's Carbon Budget and Growth Delivery Plan (UK Government, 2025) explains, "Around 30% of inflation in 2022 … came from energy bills rising … The main driver of high energy

bills remains international gas prices … reducing our exposure to volatile international gas prices is the only way to reliably bring down bills and protect the UK from global energy shocks."

6.5.1.5 The electricity generated by wind is not dependent on fossil fuels. Therefore, the marginal cost of electricity generated by such facilities, including Morven North, will not be affected by international energy prices.

6.5.1.6 Subject to system operability needs, at times when wind and other renewable generation is high enough to push carbon intensive assets fully off the grid, the price of power is no longer set by assets with volatile input fuel costs.

6.5.1.7 The development of greater capacities of wind and other renewable generation will further increase the frequency of periods during which renewable assets set the price of power.

6.5.1.8 During periods when international energy prices are high, UK electricity prices will also be high (see Section 6.4). However, schemes which operate under a CfD arrangement will still provide a shield for consumers.

6.5.1.9 This is because if wholesale market prices extend above the Strike Price (see Section 2.3.4), the difference will be collected from generators and redistributed back to consumers.

6.5.1.10 Alternative revenue arrangements with similar characteristics as the CfD can provide similar consumer protection.

6.5.1.11 Through market mechanisms such as the CfD, wind and other renewable generation facilities reduce the UK's dependency on international energy markets and reduce the UK consumer's exposure to their volatile prices.

6.5.1.12 The electricity generated by Morven North will therefore help to provide such a shield for electricity consumers and reduce the UK's exposure to volatile energy price effects. Morven North would help the UK attain its objectives of increasing self-reliance of electricity from non-fossil fuel sources and therefore offers substantial benefits to UK consumers.

6.6 Specific benefits of scheme

6.6.1 Capacity delivery

6.6.1.1 Section 5.7 of this Statement provides evidence that Morven North will deliver capacity to support the UK Government's aim to deliver a Clean Power system and keep the system clean by delivering some capacity in the 2030s as well as supporting the Scottish Government's ambition for up to 40GW of new offshore wind capacity by 2040.

6.6.1.2 The analysis at Section 5.7 and Section 5.8 of this Statement shows that there is a significant risk to the timings of delivery of the Scottish and UK pipelines for offshore wind, even before the effects of attrition on that pipeline are considered.

6.6.1.3 Morven North, part of the Morven Site with an overall seabed lease capacity of 3GW, is a significant opportunity to deliver a meaningful contribution towards Scotland's offshore wind capacity aims.

6.6.1.4 To disregard Morven North would be to increase the risk of Scotland falling short of its aim to deliver up to 40GW of offshore wind capacity by 2040, therefore falling short also of its carbon emissions reduction trajectory towards Net Zero in Scotland in 2045.

6.6.1.5 Further, without Morven North, the risk of there being a shortfall in delivered offshore wind capacity versus UK Government aims would increase versus the case that Morven North is developed.

6.6.1.6 The Government's Clean Power Plan establishes capacity ranges for 2030 and 2035 which, if reached, would support a pathway towards achieving national Net Zero by 2050. Section 5.7 of this Statement provides evidence to support the need for Morven North in reaching the 2035 capacity range levels (whether achieved in 2035 or later) and for meeting expected future capacity ranges for later years.

6.6.1.7 This is because in the period beyond 2035, further growth in low carbon electricity generation capacity is required to enable and unlock carbon emission reductions in other sectors.

6.6.2 Location

6.6.2.1 The Applicant secured a seabed lease from CES as part of the 2022 ScotWind seabed leasing round. Morven North is located in ScotWind Option Area E1. This Option Area has two other schemes proposed within it, one of which (Ossian Offshore Wind Farm) has already submitted its application for Section 36 Consent for construction and operation.

6.6.2.2 Option Area E1 is located near to an operational offshore wind development (Seagreen 1) and other consented offshore wind developments (Seagreen 1A and Berwick Bank). The location is well understood and has been surveyed, reducing the risk of complexities or delays during construction if consent was to be granted.

6.6.2.3 In 2024 NESO published beyond 2030 (NESO, 2024b), which builds on their 2022 HND (NESO, 2022) and facilitates the connection of offshore wind directly as a result of the ScotWind Leasing Round, in addition to the offshore wind connections facilitated in the HND.

6.6.2.4 Section 2.3.2 of this Statement describes NESO's task to develop and deliver a network strategy for the UK. The actions required to deliver a zero carbon electricity system should not be underestimated, partly because of the large number of concurrent developments, uncertainties around their delivery timings, and the potential to optimise the connection of these developments through shared transmission infrastructure.

6.6.2.5 Reducing uncertainties in relation to which projects require connection, and when, is likely to simplify network planning activities and may allow for focussed and prioritised infrastructure delivery to support achieving the Scottish and UK Governments' Net Zero ambitions in a cost effective and timely manner. This is as true in the development of offshore networks as it is in the development of the onshore networks required to transmit low carbon energy from its point of generation to consumers across the network without undue constraint.

6.6.2.6 Morven North is coming forward with a grid connection solution including radial grid connection at either Hawthorn Pit or Branxton with the ambition of achieving a fully consented development that provides a firm input to NESO's offshore and onshore transmission development plans at the earliest available opportunity. The proximity of Morven North to other schemes provides the potential for coordinated and efficient offshore infrastructure development to deliver significant quantities of offshore wind power to the timeframes required.

6.6.2.7 As part of the ongoing Connections Reform process, NESO has informed the Applicant that Morven North has been prioritised as a Gate 2 Phase 2 project, with a connection window currently anticipated to be between 2031 and 2035 inclusive. NESO currently propose to advise the Applicant of its firm connection date for Morven North by early 2027 (after consent applications will be submitted). This means at present the Applicant does not have a firm connection date for Morven North. The same is true for Morven South. It is possible that Morven North could connect to either Hawthorn Pit or Branxton and therefore could be the first or second project built out across the Morven Site, subject to grid connection dates. The Applicant proposes to maximise the decarbonisation benefit deliverable from the Morven Site through the two grid connection arrangements and range of potential grid connection dates.

6.6.3 Technology

6.6.3.1 Offshore wind is a critical element of Scotland's Climate Change Plan because of the significant natural resource potential available.

6.6.3.2 Fixed bottom offshore wind technology is well known and well advanced. While other low carbon technologies suitable for deployment in Scotland may show promise, for example thermal generation (including bioenergy) with Carbon Capture and Storage, hydrogen power plants, tidal energy or floating offshore wind) they have not yet have been delivered at the scale required. Therefore, they carry potentially higher levels of risk associated with their technical delivery and associated decarbonisation and security of supply benefits.

6.6.3.3 Projects which are further advanced in their development, for example those which have consent, land and/or seabed rights and are fully funded, are likely to have a lower attrition rate than less well advanced projects, because of the gates which have been successfully navigated to bring the project to its advanced status.

6.6.3.4 By submitting Morven North for planning consent, the Applicant would then be eligible to apply to the appropriate CfD Allocation Round to support its funding decision.

6.6.3.5 This is an important consideration because of the proposed scale of the project and may support the contraction of development timescales subject to planning consent, taking the funding decision and securing an appropriate grid connection.

6.6.3.6 Further, Morven North would connect directly to Great Britain's electricity transmission system, meaning that the electricity generated by Morven North may be used either directly by consumers (as electricity), or by grid-connected hydrogen electrolysers as may be developed in the future to store energy for later dispatch, so supporting the delivery of a flexible energy system.

6.6.4 Alternatives

6.6.4.1 In previous planning considerations, the Scottish Ministers have considered the policy contained in NPS EN-1 that projects for CNP Infrastructure deliverable in alternative locations are unlikely to be suitable alternatives.

6.6.4.2 To support this planning argument, the analysis at Section 5.7 and Section 5.8 of this Statement shows that there is a significant risk to the timings of delivery of the Scottish and UK pipelines for offshore wind, before the effects of attrition and development delays are considered on that pipeline.

6.6.4.3 Therefore, the analysis leads to the conclusion that the pipeline of projects analysed at those sections cannot be considered as potential alternatives to Morven North, because many of the projects listed may not make it through to fruition (see Section 5.6) and therefore that those that do are likely needed as well as, rather than instead of, Morven North.

6.7 Conclusions

6.7.1.1 Morven North is a proposed large-scale electricity generation facility comprising fixed bottom offshore wind technology. If consented, Morven North will make a significant contribution to both Scottish Government and UK Government energy policy aims.

6.7.1.2 The development of new offshore wind facilities is essential to both Scottish and UK Government policies and legally binding targets. The evidence shows that electricity generation capacity must triple or quadruple to keep pace with such demand growth, and that offshore wind has a crucial role to play in delivering the back bone of a Net Zero UK energy system.

6.7.1.3 Fixed bottom offshore wind technology is well known and well advanced. The location for Morven North is well understood and has been surveyed. In combination, these factors reduce the risk of complexities or delays during construction if consent was to be granted.

6.7.1.4 Morven North will support the Scottish Government commitment to maximise the deployment of offshore wind in Scotland, by resetting its ambition and aiming for the development of up to 40GW of new offshore wind capacity by 2040.

6.7.1.5 Further, once operational, Morven North would support delivery of the UK Government's Clean Power target, so supporting it in achieving its energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering Net Zero carbon emissions by 2050.

7 Planning appraisal

7.1 Principle of development

7.1.1.1 The project and its delivery is of national importance. The need for Morven North in relation to its contribution to meeting Scottish Government and UK Government energy policy aims and legislative targets is supported by the narrative and analysis included in this Statement, summarised in Section 6 with the key conclusions set out in Section 6.7.

7.1.1.2 However, the need for Morven North is also enshrined within Policy. The NMP supports the sustainable development of offshore wind, in suitable locations with a wider objective of tackling climate change. This principle is further outlined and confirmed through the SMP-OWE which, as above, seeks to contribute to achieving Scotland's energy and climate change objectives by providing a spatial strategy and was used to inform the ScotWind leasing process of which Morven North is part of – emphasising the suitability of the site through this spatial strategy and describing such sites as the preferred strategic locations for the sustainable development of offshore wind and marine renewables. As above, the SMP-OWE is under review but within this process an overarching objective is retained which seeks to "maximise the delivery of low carbon electricity from offshore wind farms in Scottish waters in support of the Scottish Government's target to cut GHG emission to Net Zero by 2045 and to do so by maximising the delivery of CES's ScotWind and INTOG leasing rounds between now and 2035". As set out, Morven North would have an important impact upon meeting climate change targets, through the delivery and development of a site allocated for offshore wind development, thus acknowledging the suitability of the location for development in principle.

7.1.1.3 Within the wider context, Scotland's terrestrial planning system also references the national importance of offshore wind through NPF4 which confirms that the delivery of offshore wind is considered to be a National Development and thus, benefits from an established planning needs case which sets out and confirms the acceptability of the principle of development in this regard.

7.1.1.4 Taking all of the above into account, the principle of development is considered to be acceptable through delivering an allocated offshore wind development site which in turn would help to deliver on wider climate change and sustainability targets as set out within policy.

7.1.1.5 The principle of development is established through the suite of International, National and UK-wide Policy as set out within this document. A specific, project level planning assessment is also required to be carried out, primarily focussed on the NMP.

7.2 Summary of significant effects (EIA report conclusions)

7.2.1.1 The below topic and EIA Report Chapter Specific summaries effectively outline the conclusions of the EIA Report assessments covering the entire range of environmental considerations relevant to Morven North. These summaries tie in with Appendix A of this Planning and Needs Statement which then takes the summary, which for every topic below concludes that there are no residual LSE[1], and then confirms compliance with relevant policy considerations as a result of this.

7.2.2 Physical Processes (Volume 2, Chapter 7)

7.2.2.1 Table 7.29 of Volume 2, Chapter 7 summarises the potential impacts, mitigation measures and the conclusions of LSE[1] on physical processes in EIA terms and concludes that there will be no likely significant effects on physical processes arising from Morven North during the construction, O&M or decommissioning phases.

7.2.2.2 In addition, Table 7.30 provides a summary of the potential cumulative impacts, mitigation measures and the conclusion of LSE[1] on physical processes in EIA terms and concludes there will be no likely

significant cumulative effects from Morven North, alongside other projects/plans. No likely significant transboundary effects have been identified either, in regard to effects of Morven North.

7.2.3 Benthic Subtidal Ecology (Volume 2, Chapter 8)

7.2.3.1 Table 8.46 of Volume 2, Chapter 8 provides a summary of the potential impacts, mitigation measures and conclusion of LSE[1] on benthic subtidal ecology in EIA terms, where it summarises that overall, there will be no LSE[1] on benthic receptors arising from Morven North during the construction, O&M and decommissioning phases.

7.2.3.2 Table 8.47 summarises the potential cumulative impacts, mitigation measures and the conclusion of likely significant cumulative effects on benthic subtidal ecology in EIA terms and concludes there will be no likely significant cumulative effects on benthic receptors from Morven North, cumulatively with other projects plans. In addition, no likely significant transboundary effects have been identified with regard to effects of Morven North.

7.2.4 Fish and Shellfish Ecology (Volume 2, Chapter 9)

7.2.4.1 Table 9.55 of Volume 2, Chapter 9 summarises the potential impacts, mitigation measures and the conclusion of LSE[1] on fish and shellfish ecology in EIA terms and overall concludes that there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases.

7.2.4.2 Table 9.56 summarises the potential cumulative impacts, mitigation measures and the conclusion of likely cumulative significant effects on fish and shellfish ecology in EIA terms and concludes that overall, there will be no likely significant cumulative effects from Morven North alongside other projects/plans. In addition, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.2.5 Marine Mammals (Volume 2, Chapter 10)

7.2.5.1 Table 10.89 of Volume 2, Chapter 10 summarises the potential impacts, mitigation measures and conclusion of LSE[1] in respect to marine mammals and concludes that there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases.

7.2.5.2 Table 10.90 presents a summary of the potential cumulative impacts, mitigation measures and the conclusion of LSE[1] and concludes that there will be no likely significant cumulative effects from Morven North, alongside other projects and plans. No likely significant transboundary effects have been identified either, in regard to effects of Morven North.

7.2.6 Offshore Ornithology (Volume 2, Chapter 11)

7.2.6.1 Table 11.103 provides a summary of the potential impacts, mitigation measures and the conclusion of LSE[1] on offshore ornithology in EIA terms with an overall conclusion that there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases.

7.2.6.2 Table 11.104 provides a summary of the potential cumulative impacts, mitigation measures and conclusions of LSE[1] on offshore ornithology in EIA terms, which includes assessment of collision with rotating blades, displacement and combined collision and displacement, with an overall conclusion that there will be no LSE[1] from Morven North in conjunction with other projects/plans. Additionally, no likely significant transboundary effects have been identified.

7.2.7 Commercial Fisheries (Volume 2, Chapter 12)

7.2.7.1 Table 12.24 of Volume 2, Chapter 12, Commercial Fisheries, of the EIA Report provides a summary of the potential impacts, mitigation measures and the conclusion of LSE[1] on commercial fisheries in EIA terms. Overall, it concludes that there will no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases. Table 12.25 presents a summary of potential

cumulative impacts, mitigation measures and the conclusion of likely significant cumulative effects on commercial fisheries in EIA terms, which considers:

- cumulative reduction in access to, or exclusion from established fishing grounds;
- cumulative displacement leading to gear conflict and increased fishing pressure on adjacent grounds;
- cumulative disturbance of commercially important fish and shellfish resources leading to disruption or displacement of fishing activity.

7.2.7.2 Cumulative impacts of reduced access and associated displacement arising from Morven North in combination with other projects and plans have been assessed and are predicted to result in effects of minor adverse significance, which is not significant in EIA terms, for fishing fleets. An exception to this is the UK demersal otter trawl/seine and scallop dredge fisheries where moderate adverse effects were concluded. These likely significant cumulative effects result from the presence of other offshore wind farm developments and management measures being implemented within MPAs. Morven North's contribution to these likely significant cumulative effects is limited, which reflects the low levels of fishing activity within Morven North and the ability for fishing to resume. Additional mitigation, in the form of regional scale monitoring of fisheries activity is proposed and will be delivered via the Fisheries Mitigation Monitoring Communication Plan (FMMCP) (presented in Volume 4, Annex 3: Fisheries Mitigation Monitoring Communication Plan), to which future updates may be informed by monitoring outcomes. Overall, this reduces the residual effect of cumulative reduced access and associated displacement to be minor adverse and not significant in EIA terms. No likely significant cumulative effects are concluded in relation to disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity.

7.2.7.3 Furthermore, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.2.8 Shipping and Navigation (Volume 2, Chapter 13)

7.2.8.1 Table 13.31 of Volume 2, Chapter 13 provides a summary of the potential impacts, designed-in mitigation measures and the conclusions on LSE[1] on shipping and navigation in EIA terms, and concludes that there will be no likely LSE[1] arising on shipping and navigation receptors from Morven North during construction, O&M or decommissioning phases.

7.2.8.2 Table 13.32 summarises the potential Scenario 2 (Morven Site) impacts, designed-in mitigation measures and the conclusions on LSE[1] on shipping and navigation in EIA terms and concludes that there will be no LSE[1] arising on shipping and navigation receptors from Morven North and Morven South during the construction, O&M or decommissioning phases (Scenario 2).

7.2.8.3 Furthermore, Table 13.33 provides a summary of the potential cumulative impacts, designed-in mitigation measures and the conclusions on likely significant cumulative effects on shipping and navigation in EIA terms, inclusive of Scenario 3a (Morven North and Tier 1 developments), 3c (Morven Site and Tier 1 developments), and 4 (Morven Site, Tier 1 and Tier 2 developments) and concludes that there will be no likely significant cumulative effects on shipping and navigation receptors from Morven North cumulatively with other projects/plans.

7.2.8.4 In addition, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.2.9 Marine Archaeology (Volume 2, Chapter 14)

7.2.9.1 Table 14.24 of Volume 2, Chapter 14 provides a summary of the potential impacts, mitigation measures and the conclusion on LSE[1] on marine archaeology in EIA terms and concludes that overall, there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases.

7.2.9.2 In addition, as demonstrated in Table 14.25 which presents a summary of the potential cumulative impacts, mitigation measures and the conclusion of likely significant cumulative effects on marine archaeology in EIA terms, there will be no likely significant cumulative effects from Morven North alongside other projects/plans. Furthermore, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.2.10 Aviation (Military and Civil) (Volume 2, Chapter 15)

7.2.10.1 Table 15.19 of Volume 2, Chapter 15: Aviation (Military and Civil) presents a summary of the potential impacts, mitigation measures and the conclusion of LSE[1] on aviation (military and civil) in EIA terms. Overall, it is concluded that there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases. Table 15:20 of Volume 2, Chapter 15: Aviation (Military and Civil) presents a summary of the potential cumulative impacts, mitigation measures and the conclusion of LSE[1] on aviation (military and civil) in EIA terms. The cumulative effects assessed include:

- creation of physical obstacle to aircraft operations;
- wind turbines causing interference to aviation radar.

7.2.10.2 In relation to cumulative effects, Table 15.20 demonstrates that after secondary mitigation has been considered, there will be no likely significant effects either from Morven North along or cumulatively alongside other projects/plans, or indeed from a whole project assessment. In addition, no likely transboundary significant effects have been identified in regard to effects of Morven North.

7.2.11 Other Sea Users, Marine Infrastructure and Communications (Volume 2, Chapter 16)

7.2.11.1 Table 16.23 of Volume 2, Chapter 16: Other Sea Users, Marine Infrastructure and Communications summarises the potential impacts, mitigation measures and the conclusion of LSE[1] on other sea users, marine infrastructure and communications in EIA terms and concludes that overall, there will be no LSE[1] arising from Morven North during the construction, O&M or decommissioning phases.

7.2.11.2 Additionally, Table 16.24 summarises the potential cumulative impacts, mitigation measures and the communications of likely significant cumulative effects on information on other sea users, marine infrastructure and communications on EIA terms and concludes that there will be no likely significant cumulative effects from Morven North, alongside other projects/plans. Furthermore, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.2.12 Socio-economics (Volume 2, Chapter 17)

7.2.12.1 Table 17.35 of Volume 2, Chapter 17: Socio-economics provides a summary of the potential impacts, mitigation measures and the conclusion of LSE[1] on socio-economics in EIA terms. Overall, it is concluded that there will be moderate beneficial and temporary economic effects in the Local Socio-Economic Study Area during the construction phase, arising from Morven North.

7.2.12.2 Additionally, Table 17.36 summarises the potential cumulative impacts, mitigation measures and the conclusion of likely significant cumulative effects on socio-economics in EIA terms and no significant cumulative effects from Morven North are anticipated. Furthermore, no likely significant transboundary effects have been identified in regard to effects from Morven North.

7.2.13 Climate Change (Volume 2, Chapter 18)

7.2.13.1 In regard to climate change, Table 18.33 of Volume 2, Chapter 18: Climate Change presents a summary of the potential impacts, mitigation measures and the conclusion of LSE[1] on climate change in EIA terms. Overall, it has concluded that there will be the following LSE[1] arising from Morven North during the construction, O&M or decommissioning phases:

- Beneficial effects arising in regard to GHG emissions, from the consumption of materials and activities required to facilitate the O&M phase and estimated abatement of UK grid emissions;

- Beneficial effects from net whole lifetime GHG effects of Morven North.

7.2.13.2 Table 18.34 of Volume 2, Chapter 18: Climate Change presents a summary of the potential cumulative impacts, mitigation measures and the conclusion of likely significant cumulative effects on climate change, in EIA terms. Overall, it is concluded that the following likely significant cumulative effects from Morven North will arise, alongside other projects/plans:

- GHG emissions arising from the manufacturing and installation under Scenarios 1, 2 and 3;
- Beneficial effects in GHG emissions, arising from the consumption of materials and activities required to facilitate the O&M phase of Scenarios 1, 2 and 3 and estimated abatement of UK grid emissions;
- Net whole lifetime GHG effects of Scenarios 1, 2 and 3 (beneficial).

7.2.13.3 As a result of implementation of additional mitigation measures, all adverse likely significant effects are reduced to not significant residual effects. Furthermore, no likely significant transboundary effects have been identified in regard to Morven North.

7.2.14 Major Accidents and Disasters (Volume 2, Chapter 19)

7.2.14.1 As detailed in section 19.11 of Volume 2, Chapter 19: Major Accidents and Disasters, during the scoping stage of the assessment, all potential major accidents and disasters associated with Morven North were identified, and its vulnerability to such events evaluated (see able 19.12 for further details). This assessment concluded that all reasonably foreseeable worst-case scenarios can be effectively managed to an acceptable level through the implementation of existing control measures, and that there is no LSE[1] for any of the identified risk events presented in Table 19.12.

7.2.14.2 Morven North is not expected to result in any major accidents or disasters following the incorporation of designed-in measures and adopted mitigation, therefore an assessment of cumulative effects was not considered necessary. In addition, no likely significant transboundary effects have been identified in regard to effects of Morven North.

7.3 Policy appraisal

7.3.1.1 As per Section 7.1 above, the principle of development is considered to be acceptable. While the principle is considered to be acceptable the project still requires to be assessed against all relevant policy, covering a wide range of environmental considerations.

7.3.1.2 A detailed NMP policy assessment is included in Appendix A, this sets out all relevant policies and provides commentary and assessment on how the proposal is considered to comply with these, based on the topic specific EIA Report summaries outlined in 7.2 above. As an overview, through consideration of all the predicted likely significant effects and, considering mitigation measures proposed to reduce or manage impacts, there are considered to be minimal residual effects. Through assessment of the residual effects against policy, it is clear that Morven North meets the relevant policy requirements which aim to increase renewable energy capacity, while minimising effects on human health, minimising wider environmental harm and ensuring that conflicts with other users of the marine environment are kept to a minimum.

7.3.1.3 As set out above, the granularity of the NMP and the policies within is such that compliance with these and thus the NMP as a whole, allows for wider policy compliance with, firstly, the UK Marine Policy Statement whose key objectives closely align with those of the NMP.

7.3.1.4 When read as a whole, taking account of all topic chapters, the EIA Report also allows for a conclusion to be reached with regard to the Sectoral Marine Plan for Offshore Wind Energy, where Morven North can fully demonstrate cognisance has been taken of all key objectives, opportunities and risks with steps taken to address all of these as appropriate.

7.3.1.5 Morven North is considered to comply with all overarching, general and renewable energy specific policies. The project represents the delivery of an offshore wind farm, being delivered within a

location allocated for such a use. The delivery of the offshore wind array, in principle, accords with a wide range of international, UK-wide and Scottish policy aimed at reducing the effects of climate change and facilitating a move away from fossil fuels.

7.3.1.6 As demonstrated through the EIA Report, Morven North can be successfully integrated into the marine environment within this location, respecting and co-existing with natural and cultural heritage receptors, other infrastructure and users of the marine area. Where adverse likely significant effects have been identified, these can be mitigated to the extent where they reduce such effects to acceptable levels and thus can comply with NMP policy.

8 Conclusions

8.1.1 General conclusions

8.1.1.1 The scale and pace of action required to reduce emissions to meet Scotland and the UK's legally binding Net Zero targets is now larger than ever it has previously been. The dates by which those targets must be met are getting closer, and decarbonisation actions have not kept pace with decarbonisation plans in recent years, resulting in emissions reducing more slowly than previously established trajectories. It is therefore essential that rapid progress is made otherwise the legally binding targets of Net Zero in Scotland by 2045 and across the UK by 2050 will not be met.

8.1.1.2 The 2026 Updated Offshore Wind Policy Statement (Scottish Government, 2026) substantially increases the Scottish Government's offshore wind policy ambition, aiming to deliver up to 40GW of new offshore wind capacity by 2040.

8.1.1.3 NPF4 confirms the need for Morven North and other projects like it, recognising that "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".

8.1.1.4 It is clear from the UK's energy and planning policies and forecasts by the CCC that electricity demand is expected to approximately double or more by 2050 as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport.

8.1.1.5 The evidence suggests that electricity generation capacity must triple or quadruple to keep pace with such demand growth, and that offshore wind has a crucial role to play in delivering the 'back bone' of a Net Zero UK energy system.

8.1.1.6 Therefore, although the need for new low carbon electricity generation infrastructure is urgent, the need for a pipeline of projects ready to deliver is also critical and must be of an unprecedented scale. Such infrastructure brings forward benefits across all aspects of Scottish and UK energy policy, including decarbonisation, energy security and affordability.

8.1.1.7 Even in isolation, each of these aspects is of critical national importance. Therefore, any project which provides benefits in more than one aspect could be justified to be afforded substantial weight in the planning balance.

8.1.1.8 However, no single project is likely to possess sufficient scale, deliverability, flexibility and efficiency attributes so as to meet the urgent need for all these benefits alone. It is therefore an accumulation of a large number of individual low carbon generation projects which together will deliver Scottish and UK energy policy aims and national legally binding decarbonisation targets.

8.1.1.9 In previous planning considerations, the Scottish Ministers have considered the policy contained in NPS EN-1 that projects for CNP Infrastructure deliverable in alternative locations are unlikely to be suitable alternatives. There is a significant risk to the timings of delivery of the Scottish and UK pipelines for offshore wind, before the effects of attrition and development delays are considered on that pipeline. Therefore, any pipeline of potential projects cannot be considered as potential alternatives to Morven North, because many of the projects listed may not make it through to fruition and therefore that those that do are likely needed as well as, rather than instead of, Morven North.

8.1.2 Specific to Morven North

8.1.2.1 Morven North is compatible with Scottish and UK planning and energy policies and would substantially help attain policy objectives, serving the public interest. Maximising the capacity of generation at the proposed location, will deliver benefits to all GB energy consumers.

8.1.2.2 Morven North would make a significant contribution to both Scotland's and the UK's legally binding climate change targets by helping to decarbonise energy supply. Morven North would also contribute to other Scottish and UK aims for the energy system, including ensuring security of supply and shielding consumers from the effects of volatile international energy markets.

8.1.2.3 Consenting Morven North would provide greater certainty to NESO's network design activities, allowing NESO to target credible projects which are ready to connect in order to connect greater capacities of low carbon generation earlier and more efficiently than otherwise would be the case.

8.1.2.4 This Statement demonstrates that the need case for Morven North could be justified to be afforded substantial weight in the planning balance.

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Appendix A NATIONAL MARINE PLAN – POLICY COMPLIANCE

Table A. 1: NATIONAL MARINE PLAN – POLICY COMPLIANCE

Policy	Policy Text	Morven North Compliance
General Policies		
General Planning Principle		
GEN 1 General Planning Principle	There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.	Compliant. The development of Morven North would, in of itself, represent the use of the marine environment through sustainable development. As demonstrated below, this can be assessed as being consistent with wider policy requirements and objectives also.
Achieving a sustainable economy		
GEN 2 Economic benefit	Sustainable development and use which provides economic benefit to Scottish communities is encouraged when consistent with the objectives and policies of this Plan.	Compliant. As demonstrated through Volume 2, Chapter 17 of the Environmental Impact Assessment (EIA) Report (Socio-economics) there is expected to be a moderate beneficial and temporary economic impact as a result of Morven North. As such, considering the wider acceptability and compliance with policy, this is considered to fully accord with this policy.
GEN 4 Co-existence	Proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision making processes, when consistent with policies and objectives of this Plan.	Compliant. As demonstrated through Volume 2, Chapters 12: Commercial Fisheries, Volume 2, Chapter 13: Shipping and Navigation, Volume 2, Chapter 15: Aviation and Volume 2, Chapter 16: Other Sea Users, Marine Infrastructure and Communications; there are no residual adverse Likely Significant Effects (LSE)upon any of these sectors assessed. Therefore it can be concluded that Morven North could successfully co-exist with other activities within the Scottish Marine Area. Successful co-existence will be enabled through embedded mitigation and management plans and/or condition requirements, as appropriate.

Policy	Policy Text	Morven North Compliance
		Throughout the EIA Report and associated topic specific chapters, no residual adverse likely significant cumulative effects have been identified. To this end, it can also be concluded that Morven North can successfully co-exist with other developments and development sectors within the Scottish marine area.
Ensuring a strong, healthy and just society		
GEN 5 Climate Change	Marine planners and decision makers must act in the way best calculated to mitigate, and adapt to, climate change.	Compliant. In regard to climate change, Table 1.33 of Volume 2, Chapter 18: Climate Change presents a summary of the potential impacts, mitigation measures and the conclusion of LSE on climate change in EIA terms. Overall, it has concluded that there will be the following LSE arising from Morven North during the construction, Operation and Maintenance (O&M) or decommissioning phases: • Moderate adverse effects from Greenhouse Gas (GHG) emissions arising from the manufacturing and installation of Morven North, however following the implementation of further mitigation measures, the significance is reduced to a minor adverse (not significant) residual effect; • Beneficial effects arising in regard to GHG emissions, from the consumption of materials and activities required to facilitate the O&M phase and estimated abatement of United Kingdom (UK) grid emissions; • Minor adverse effects from GHG emissions arising from decommissioning works; • Beneficial effects from net whole lifetime GHG effects of Morven North.

Policy	Policy Text	Morven North Compliance
		Table 1.34 of Volume 2, Chapter 18: Climate Change presents a summary of the potential cumulative impacts, mitigation measures and the conclusion of LSE on climate change, in EIA terms. Overall, it is concluded that the following likely significant cumulative effects from Morven North will arise, alongside other projects/plans: • GHG emissions arising from the manufacturing and installation under Scenarios 1, 2 and 3; • Beneficial effects in GHG emissions, arising from the consumption of materials and activities required to facilitate the operation and maintenance phase of Scenarios 1, 2 and 3 and estimated abatement of UK grid emissions; • Minor adverse effects in GHG emissions, arising from decommissioning works and the recover (or disposal) of materials under Scenarios 1, 2 and 3; • Net whole lifetime GHG effects of Scenarios 1, 2 and 3 (beneficial). As a result of implementation of additional mitigation measures, all adverse LSE are reduced to not significant residual effects. Furthermore, no likely significant transboundary effects have been identified in regard to effects of Morven North. Given the above, Morven North can be considered to comply with this policy.
GEN 6 Historic environment	Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.	Compliant. Volume 2, Chapter 14: Marine Archaeology of the EIA Report concludes that there would be no LSE arising from Morven North. With regard to enhancement, as set out within the aforementioned Chapter, in the case where an unknown receptor is discovered during the

Policy	Policy Text	Morven North Compliance
		construction phase and further impacts are unavoidable, steps would be taken to set out a framework for further remedial measures to be applied on a case-by-case basis, in consultation with an archaeological curator, but could include, inter alia, recovery, relocation, excavation, conservation, stabilisation and/or recording of the receptor. This would also produce new information on a previously unknown receptor and would create the potential for the site to contribute to regional, national and/or international research objectives and provide considerable enhancement to the archaeological or historical interest and knowledge of the asset, which will secured via the relevant management plan and/or discovery protocols . Given all of the above, Morven North can be considered to comply with this Policy.
GEN 7 Landscape/seascape	Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape and visual impacts into account.	No conflict. Seascape and Landscape impacts from Morven North were scoped out of the assessment and thus, no adverse impacts are expected to arise, as previously agreed with the Marine Directorate – Licensing Operations Team (MD-LOT). Morven North does not therefore conflict with this policy.
Living within environmental limits		
GEN 9 Natural Heritage	Development and use of the marine environment must: a) Comply with legal requirements for protected areas and protected species	Compliant. As set out through Volume 2, Chapter 8: Benthic Subtidal Ecology, Volume 2, Chapter 9: Fish and Shellfish Ecology, Volume 2, Chapter 10: Marine Mammals and Volume 2, Chapter 11: Offshore Ornithology, the EIA Report assesses and confirms that no adverse LSE are expected from Morven North on any of these receptors. The Morven North Marine Protected Areas Assessment, (Chapter 7, additional information Documentation) conclude Morven North would not

Policy	Policy Text	Morven North Compliance
	b) Not result in significant impact on the national status of Priority Marine Features c) Protect and, where appropriate, enhance the health of the marine area	hinder the achievement of the conservation objectives of relevant Marine Protected Areas, either alone or in-combination with other plans and projects and the Morven North Habitats Regulations Appraisal concludes no Adverse Effects on Integrity for the project alone and proposes compensation measures to address concluded Adverse Effects on Integrity when Morven North is considered in-combination with other plans and projects. These assessments and steps taken with regard to mitigation align with legal and regulatory requirements. As such, Morven North can be considered to be compliant with this policy.
GEN 10 Invasive non-native species	Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.	Compliant. An Invasive Non-Native Species Management Plan (INNSMP) and Biosecurity Plan (Version 1) is included with the application as an Appendix to the EIA Report. This provides an overview of the proposed measures to be implemented to ensure biosecurity control and minimise potential impacts on the marine environment associated with Morven North. This would be further developed as the project progresses, post consent, but at this stage ensures that Morven North can comply with policy.
GEN 11 Marine Litter	Developers, users and those accessing the marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers.	Compliant. Through the Environmental Management Plan (EMP) and the Marine Pollution Contingency Plan (MPCP), included as appendices to the EIA Report, various preventative steps are covered in terms of any construction, O&M or decommissioning works being carried out. This includes adhering to best practice measures but also steps to be taken in the event of anything being dropped or spilled into the sea as a result of works. All staff are to be appropriately trained, and reporting mechanisms will be in place to ensure

Policy	Policy Text	Morven North Compliance
		that no incidents occur. Ultimately these steps will allow for compliance with this policy.
GEN 12 Water quality and resource	Developments and activities should not result in deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.	Compliant. Through the EMP and MPCP, included as appendices to the EIA Report, various preventative steps are covered in terms of any construction, O&M or decommissioning works being carried out. This includes adhering to best practice measures but also steps to be taken in the event of anything being dropped or spilled into the sea as a result of works. All staff are to be appropriately trained, and reporting mechanisms will be in place to ensure that no incidents occur. Ultimately these steps will allow for compliance with this policy.
GEN 13 Noise	Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such efforts.	Compliant. Sensitive species are not anticipated to be adversely affected by noise or vibration, this is confirmed through relevant Chapters including Volume 2, Chapters 9: Fish and Shellfish Ecology, Volume 2, Chapter 10: Marine Mammals, Volume 2, Chapter 11: Offshore Ornithology, including measures and commitments to reduce likelihood of impact as set out in Volume 4, Annex 2: Marine Mammal Mitigation Protocol (Version 1)
GEN 14 Air Quality	Development and use of the marine environment should not result in the deterioration of air quality and should not breach any statutory air quality limits.	Compliant. Through the EMP and MPCP, included as appendices to the EIA Report, various preventative steps are covered in terms of any construction, O&M or decommissioning works being carried out. This includes adhering to best practice measures and ensuring any pollution causing practices are appropriately managed. All staff are to be appropriately trained, and reporting mechanisms will be in place to ensure that no incidents occur. Ultimately these steps will allow for compliance with this policy.
Promoting good governance		

Policy	Policy Text	Morven North Compliance
GEN 17 Fairness	All marine interests will be treated with fairness and in a transparent manner when decisions are being made in the marine environment.	Compliant. As outlined above in relation to Policy GEN4 as well as the coverage of wider cumulative developments assessed through the EIA, account has been taken for all other potentially impacted marine users and no adverse residual LSE have been identified.
GEN 18 Engagement	Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.	Compliant. Morven North has met all statutory requirements in terms of engagement for a project of this nature. This has included extensive dialogue with MD-LOT and NatureScot throughout the process. Details can be found within Volume 1, Chapter 5: Consultation.
Using sound science responsibly		
GEN 19 Sound evidence	Decision making in the marine environment will be based on sound scientific and socio-economic evidence.	Compliant. The EIA Report has been compiled by Tetra Tech RPS Energy and associated consultants. These organisations are accredited and leading EIA consultants, who have produced and delivered a high standard of EIA Report using all relevant scientific and socio-economic evidence including site specific and project level surveys, where appropriate and of relevance.
GEN 21 Cumulative Impacts	Cumulative impacts affecting the eco-system of the marine plan area should be addressed in decision making and plan implementation.	Compliant. The EIA Report as a whole covers a wide ranging Cumulative Effects Assessment and includes specific topic by topic coverage of potential cumulative impacts. Overall no such impacts are identified as leading to likely significant cumulative effects and thus, Morven North is considered to comply with this policy.
Offshore Wind and Marine Renewable Energy		
Marine Planning Policies		
Spatial Planning		
RENEWABLES 1	Proposals for commercial scale offshore wind and marine renewable energy development should be	Compliant. Morven North sits within designated Scotwind Plan Option Area E1 and seeks to deliver

Policy	Policy Text	Morven North Compliance
	sited in the Plan Option areas identified through the Sectoral Marine Plan process (Map 9). Plan options are considered the preferred strategic locations for the sustainable development of offshore wind and marine renewables. This preference should be taken into account by marine planners and decision makers if alternative development or use of these areas is being considered. Proposals are subject to licencing and consenting processes.	an offshore wind farm array as proposed through the Sectoral Marine Plan.
RENEWABLES 4	Applications for marine licences and consents relating to offshore wind and marine renewable energy projects should be made in accordance with the Marine Licensing Manual and Marine Scotland's Licensing Policy Guidance.	Compliant. Both the mechanics of the application submission as well as the content and approach to submission itself have been carried out in accordance with relevant policy and guidance.
RENEWABLES 5	Marine planners and decision makers must ensure that renewable energy projects demonstrate compliance with Environmental Impact Assessment and Habitats Regulations Appraisal legislative requirements.	Compliant. The application as a whole has been prepared in line with the regulatory requirements of the relevant EIA Regulations and Habitats Regulations, detailed within the EIA Report and Habitats Regulations Appraisal (HRA) submitted with the application.,
RENEWABLES 6	New and future planned grid connections should align with relevant sectoral and other marine spatial planning processes, where appropriate, to ensure a co-ordinated and strategic approach to grid planning. Cable and network owners and marine users should also take a joined-up approach to development and activity to minimise impacts on the marine historic and natural environment and other users.	No conflict. The Morven North proposal covers the array only, with grid connection application(s) to be pursued separately. Any future application(s) to secure grid connections will be conducted with full consultation and collaboration with stakeholders, including MD-LOT, NESO and other interested parties. Each chapter of the EIA Report includes, where relevant, a Cumulative Effects Assessment (CEA) which considers the potential cumulative effects of Morven North and the two proposed grid connections. Volume 3, Annex 6.2: Shared Cumulative Effects Screening provides the CEA methodology and the long list of relevant projects, plans and activities which Morven North (and Morven South) may interact that may lead to a

Policy	Policy Text	Morven North Compliance
		cumulative effect, and provides a screening matrix used in the relevant EIA Report chapters, which identifies projects, plans and activities with a spatial or temporal overlap with Morven North, and Morven South.
RENEWABLES 7	Marine planners and decision makers should ensure infrastructure is fit for purpose now and in future. Consideration should be given to the potential for climate change impacts on coasts vulnerable to erosion.	No conflict. As Morven North relates only to the array site, no impacts are predicted in relation to coastal erosion and as such, the proposal does not conflict with this policy. Climate Change impacts have been assessed in relation to Morven North in Volume 2, Chapter 18: Climate Change
Maximising benefits from offshore renewables		
RENEWABLES 8	Developers bringing forward proposals for new developments must actively engage at an early stage with the general public and interested stakeholders of the area to which the proposal relates and of adjoining areas which may be affected.	Compliant. Morven North has met all statutory requirements in terms of engagement for a project of this nature. This has included extensive dialogue with MD-LOT and NatureScot throughout the pre-application process. Consultation for Morven North can be found within Volume 1, Chapter 5: Consultation and Volume 3, Annex 5.3: Community Engagement Statement
RENEWABLES 8	Developers bringing forward proposals for new developments must actively engage at an early stage with the general public and interested stakeholders of the area to which the proposal relates and of adjoining areas which may be affected.	Compliant. Morven North has met all statutory requirements in terms of engagement for a project of this nature. This has included extensive dialogue with MD-LOT and NatureScot throughout the pre-application process. Consultation for Morven North can be found within Volume 1, Chapter 5: Consultation and Volume 3, Annex 5.3: Community Engagement Statement
RENEWABLES 9	Marine planners and decision makers should support the development of joint research and monitoring programmes for offshore wind and marine renewables energy development.	Compliant. Included as part of the EIA Report are a raft of appendices detailing outline management plans which include requirements for ongoing monitoring which will shape the construction and operation of Morven North. The Applicant will liaise with relevant stakeholders, MD-LOT and NatureScot to aid in identifying opportunities for

Policy	Policy Text	Morven North Compliance
		proportionate, evidence led regional or strategic monitoring that can improve understanding of the environmental implications of offshore wind, particularly where recognised evidence gaps exist.
RENEWABLES 10	Good practice guidance for community benefit from offshore wind and renewable energy development should be followed by developers, where appropriate.	Compliant. The project is following all relevant guidance with regard to community benefit. Specific examples include in terms of Economic Benefits covered in Volume 2, Chapter 17: Socio-economics. The 2023 Morven North Supply Chain Development Statement outlines that Morven North is to be aligned with Scotland's Community Wealth Building approach and will engage with local communities to enhance the economic impacts of Morven North.