**Shetland Islands Council Climate Change Strategy**

**Strategic Environmental Assessment**

**Post-Adoption Statement**

**[](http://www.shetland.gov.uk/)**

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## Introduction and the Strategic Environmental Assessment Process

Shetland Islands Council (SIC) adopted the Shetland Islands Council Climate Change Strategy 2023-2028 on 13 December, 2023. Prior to its adoption, the Strategy underwent a Strategic Environmental Assessment (SEA) as required by the Environmental Assessment (Scotland) Act 2005. This Post-Adoption Statement has been prepared in accordance with the Act.

The SEA process has followed this sequence:

1. A Screening Report was submitted to the Strategic Environmental Assessment Gateway (SEA Gateway) to determine if the Strategy would need to undergo an SEA. After a consultation period, it was determined that the Strategy would require an SEA.
2. Simultaneously, a Scoping Report was submitted to the SEA Gateway which included a summary of key environmental topics in Shetland and an assessment of how they would likely be affected by the proposals of the Climate Change Strategy. This also underwent a period of consultation with statutory Consultation Authorities (CAs) which produced recommendations for the structure of the Environmental Report. These recommendations were taken on board.
3. An Environmental Report was prepared to accompany the Strategy, which considered:
   1. Any possible alternatives to the SIC Climate Change Strategy that would achieve the same outcomes with lesser negative environmental impact or greater environmental benefit;
   2. How the Strategy and Environmental Report underwent the SEA process;
   3. The relations between the Strategy and other documents with regards to environmental impact;
   4. Baseline data relating to the current state of the environment in Shetland;
   5. Each of the Strategy objectives’ likely effect on the environment, if known, and whether the effect will be at a local, regional, national, or international scale;
   6. How potential negative environmental effects of these objectives can be mitigated and how potential positive environmental effects can be enhanced;
   7. Monitoring arrangements for assessing the Strategy’s impact on the environment as it relates to the potential impacts laid out in the Environmental Report and;
   8. How the Environmental Assessment affected the development of the Strategy.
4. The Strategy and Environmental Report underwent a 6-week consultation period with the public and with the statutory CAs during which comments were collected. Due to a bureaucratic error, this period was extended by one week and a half for the statutory CAs.
5. Comments from the consultation period were noted and integrated into the Strategy where appropriate. These responses and any edits made in response to them can be found in Table 2 of this document. The Strategy was passed by Shetland Islands Council on 13 December, 2023.

The Strategy, accompanying Environmental Report, and this Post-Adoption Statement are available online at: [www.shetland.gov.uk/climatechange](http://www.shetland.gov.uk/climatechange)

They can also be accessed at:

Shetland Islands Council Environment & Estate Operations

North Gremista Industrial Estate

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## How environmental considerations have been integrated into the Shetland Islands Council Climate Change Strategy

The protection and enhancement of the environment have been at the centre of the Strategy’s design from the outset. Because much of Shetland’s emissions are land-based, there is an inextricable link between protecting and restoring the natural environment and mitigating climate change. Undergoing the SEA process has further enhanced this focus on environmental factors. The SEA consultation has also brought welcome perspective from the consultation authorities and wider public on how environmental benefits can be maximised.

The following table -Table 1- contains says what the Strategy’s SEA Objective is for each SEA topic and how each environmental topic has been taken into account in the Strategy. It then explains how the topic has been taken into account in the development of the Strategy. This table is derivative of the table found in Section 2.5.4 of the SIC Climate Change Strategy Environmental Report.

Table 1

|  |  |  |  |
| --- | --- | --- | --- |
| SEA Topic | SEA Objective | Taken into account in the SIC Climate Change Strategy | How is the topic taken into account or what is the reason for it not being taken into account? |
| Biodiversity, flora and fauna | To protect, conserve and enhance the biodiversity of Shetland. | Yes | * The need to protect and enhance biodiversity and ecology has been established from the outset. We learned in the Net Zero Route Map exercise that Shetland’s largest source of emissions is its land, which presented the task of preserving and restoring natural features. This was at the forefront of the Strategy’s development. * The Nature-based Solutions section of the Strategy calls for achieving biodiversity gains and protecting rare and endemic species. |
| Population and Human Health | Support thriving, healthy and resilient communities. | Yes, in part by aligning with prior PPS on active travel | * The Strategy aligns with the Shetland Active Travel Strategy. Both Strategies make clear that replacing car miles with active travel ones will have the dual benefits of reducing GHG emissions and improving Shetlanders’ health. * Strategy sections such as Energy, Buildings, and Transport set out how climate action that shifts away from fossil fuel and improves energy efficiency is also likely to improve human health and well-being by making living and working safer, warmer, and more affordable. * Strategy sections such as Empowerment and Communications explain how Council climate action will be inclusive of disadvantaged and minority groups. |
| Soil | Safeguard the soil quality and geodiversity in Shetland, particularly of peat and other carbon rich soils. | Yes | * The need to protect and enhance Shetland’s soil has been established from the outset. We learned in the Net Zero Route Map exercise that Shetland’s largest source of emissions is its land, which presented the task of preserving and restoring carbon-rich soils. This was at the forefront of the Strategy’s development. * The Nature-based Solutions section outlines the Council’s strategic approach to enhancing peatland restoration in Shetland. * The Nature-based Solutions section also commits the Council to try to protect carbon-rich soils from planned development. |
| Water | Enhance and sustainably interact with the water environment of Shetland. | Yes | * The Nature-based Solutions section of the Strategy includes a commitment to explore blue carbon. * Climate change adaptation in Shetland will require planning for increased flood risk. Any changes made to reduce flood risk are encouraged to be done using nature-based solutions such as dunes. |
| Air | To maintain air quality and reduce levels of nuisance throughout Shetland. | Yes | * Air quality in Shetland is excellent. However, improvements will be made by transitioning from fossil fuels to renewable energy and reducing the number of car miles travelled in Shetland. |
| Climatic factors | * Reduce greenhouse gas emissions * Promote and enable adaptation to climate change | Yes | * The need to address climatic factors is at the centre of the Shetland Islands Council Climate Change Strategy. The actions and objectives have been written based on the most effective pathway for SIC to reach net zero as identified in the Net Zero Route Maps exercise undertaken in 2021 and 2022. * Objectives and actions in the Strategy which are designed to adapt the Council to the effects of climate change are aligned with the latest guidance from Adaptation Scotland to be effective and aligned with adaptation action across the rest of Scotland. |
| Cultural heritage | Safeguard distinctive cultural heritage features and their settings | Yes | * By preparing Shetland’s natural heritage and infrastructure for the effects of climate change, the Strategy aims to maximise benefits to Shetland’s cultural heritage and mitigate any potential negative effects. |
| Landscape | Protect and manage the special characteristics of Shetland’s landscapes and seascapes. | Yes, in part by aligning with national PPS – National Planning Framework 4 | * The need to protect and enhance Shetland’s unique landscape has been established from the outset. We learned in the Net Zero Route Map exercise that Shetland’s largest source of emissions is its land, which presented the task of preserving and restoring carbon-rich soils. This was at the forefront of the Strategy’s development. * The Nature-based Solutions section outlines the Council’s strategic approach to enhancing peatland restoration in Shetland. * The Nature-based Solutions section also commits the Council to try to protect carbon-rich soils from planned development. |
| Material assets | Promote the sustainable use of natural resources and material assets. | Yes, in part by aligning with national PPS on the circular economy | * The Resources and Waste section of the Strategy is driven by an aim to increase the use of sustainably-made, natural, and reusable materials. The Strategy aligns with *Making Things Last: a circular economy strategy for Scotland* and with the approach towards a circular economy favoured by the Scottish Government, evidenced by the upcoming Circular Economy bill. |

## How the Environmental Report has been taken into account in the Shetland Islands Council Climate Change Strategy

The SIC Climate Change Strategy has taken the Environmental Report into account throughout its structure and content by:

* Identifying and maximising environmental co-benefits in each Strategy section.
* Aligning the Strategy with existing environmental legislation, including the United Nations Sustainable Development Goals, Scotland’s National Planning Framework 4, and Shetland’s Local Development Plan 2.
* Developing a Nature-based Solutions section of the Strategy, which directly addresses the need to protect and restore the environment in undertaking climate action.
* Taking into account statutory consultee comments following issue of a scoping report outlining the key environmental issues, the options to be assessed and the scope of the draft Strategy that are to be addressed in the Environmental Report.
* Taking into account statutory consultee and public comments following consultation on the draft Strategy and its accompanying Environmental Report.
* Integrating mitigation and enhancement of the environmental effects of the Strategy where opportunities for each –where appropriate- were identified.

## How opinions expressed during consultation have been taken into account in the Shetland Islands Council Climate Strategy

Table 2

|  |  |  |  |
| --- | --- | --- | --- |
| Strategy Section | Consultation source | Consultation response | How the response has been taken into account |
| Energy | Internal (SIC) | Suggested to add to Energy Objective 4: ‘with a particular focus on low income households.’ | Added |
| Entire Strategy | Historic Environment Scotland (HES) | The current draft does not make any reference to the historic environment. We consider that this could make it difficult for the strategy to align with Historic Environment Policy for Scotland (HEPS) and Our Past Our Future: The Strategy for Scotland’s Historic Environment, and to take advantage of the many opportunities that cultural heritage and the historic environment offers for addressing the climate and nature crises. | The Shetland Islands Council Climate Change Strategy is a way to guide and align climate action across Council services. It will be the impetus for a number of specific and detailed projects and plans, which will be expected to align with HES documents where needed. The Strategy is also fully aligned with Shetland Local Development Plan 2, which itself is aligned with HES’s strategies. A Shetland-wide Climate Change Strategy is currently under development via the Shetland Partnership and we believe this is a better vehicle to align with and realise the policies and principles as set out in the HEPS and Our Past Our Future documents. |
| Enablers | Historic Environment Scotland (HES) | We are broadly supportive of the enablers and strategic objectives set out in the draft Strategy. However, it is essential that delivery of those strategic objectives is underpinned by an understanding of the key role of the historic environment in climate action.  The historic environment is not just designated buildings and sites but rather our surroundings as they have been shaped, used and valued by people in the past, and continue to be today. The historic environment will be key to delivery of a Just Transition and brings with it specific opportunities and challenges.  The historic environment is fundamental to every place in Scotland and is impossible to separate from the rest of our environment. We advocate a holistic approach, which seeks to optimise mutual benefits for the natural and historic elements of the environment.  Our comments on the Themes below will explain how you can make connections between the historic environment and climate action. | Text added to ‘Climate Change Risks to Shetland’: ‘This also includes risk to the wider historic environment, including natural heritage sites and areas of significant natural value.’ |
| Energy | Historic Environment Scotland (HES) | An increase in renewable energy development is likely to have effects on the historic environment of Shetland, both at site specific levels, and cumulatively. In establishing a presumption towards renewable energy and islands-based generation, it will be essential that decision making is informed by, and aligns with, historic environment strategy and policy, including Our Past Our Future, HEPS and NPF4. It would be helpful if the Strategy could provide more detail about how this SO will interact with planning policy relating to renewables development. | The approach to renewable energy development will be further detailed with the development of the Shetland Energy Strategy –SIC as a local authority has limited influence on large energy developments, therefore this strategy provides a high level overview of aspects related to climate. The Energy Strategy will align with the above documents and policies, as does the Shetland Local Development Plan 2. |
| Buildings | Historic Environment Scotland (HES) | Traditional buildings (those which are pre-1919) make up 19% of our existing housing stock in Scotland, and a significant proportion of our infrastructure is historic. The maintenance, reuse and adaptation of existing heritage assets mitigates resource scarcity, prevents waste and can reduce carbon emissions if low carbon materials are used. It also makes best use of the embodied carbon in the built assets we already have.  These buildings have particular requirements when seeking to improve energy efficiency. It is vital therefore that all action which drives energy efficiency and zero-emissions heat takes into account the needs of traditionally constructed buildings and their users. Poor specification and/ or installation can result not only in a failure to achieve optimum energy efficiency, but could also affect the health and wellbeing, and finances of users of the building, and be damaging to the fabric and the cultural significance of the building itself.  In order to achieve a Just Transition, it is essential that the significant number of people who use, live in or have responsibility for traditional buildings have access to the right knowledge, skills, materials and measures to enable optimum transition to energy efficiency and zero emissions heating.  Effective delivery of heat decarbonisation and energy efficiency for traditional and historic buildings should be a key strand of action for the Strategy. | Text added to ‘Mitigation and Net Zero’: ‘…and should always be undertaken in a way that is considerate of the historic and natural environment.’ |
| Resources & Waste | Historic Environment Scotland (HES) | Outcomes related to the circular economy should consider traditional buildings. The historic environment is part of our circular economy. We have invested huge amounts of carbon in our historic structures – in building them, in maintaining them, and in adapting them  We can get the best value from this investment by keeping our historic structures in use and adapting them to new uses. Where that isn’t possible, we should reuse or recycle the resources that created them. | The Shetland Islands Council Climate Change Strategy is supportive of a circular economy and mitigating the unnecessary waste of embodied carbon. Using local and existing materials further supports the Strategy’s aims of shortening supply chains and re-using wherever possible. The desired outcomes of the Strategy are fully aligned with this comment. |
| Business & Industry | Historic Environment Scotland (HES) | Ensuring a continuing supply of the specialist skills required to conserve and maintain traditional buildings is vital, not least for the important contribution the repair, reuse and retrofit of historic assets can make to reducing carbon emissions and achieving national net-zero targets. Upskilling and attracting talent with historic environment skills is an important consideration in a just transition.  The repair, maintenance and retrofit of existing heritage assets delivers good, green jobs. Investing in the skills training and employment pathways for the sector will enable economic and social resilience at a local level, as well as prevent money and carbon being wasted through poorly informed decisions that can lead to maladaptation. However, formal provision of skills training is currently focused in urban areas- this is a challenge for developing skills in remote, rural and island communities.  Developing the skills and supply chains necessary to deliver heat decarbonisation and energy efficiency for traditional and historic buildings should be a key strand of action for the Strategy. | The challenge of green skills and jobs in the buildings sector is of critical importance to the SIC Climate Change Strategy, and the desired outcomes of the Strategy and Action Plan are fully aligned with this comment. |
| Nature-based Solutions | Historic Environment Scotland (HES) | We advocate a holistic approach, which seeks to optimise mutual benefits for the natural and historic elements of the environment. All of our landscapes, rural and urban, are part of the historic environment. Natural and cultural benefits and outcomes are often interdependent.  Activities such as peatland restoration, tree planting, grazing management, water management and wetland expansion have the potential for both positive and negative effects for the historic environment. Nature based solutions should seek to bring benefits for the historic environment too. | A key environmental objective of the SIC Climate Change Strategy is to maximise co-benefit improvements to the historic environment at every opportunity, including when implementing nature-based solutions. Where nature-based solutions to climate change may have an effect on the historic environment, these will be expected to align with the principles of NPF4 and bring benefits to the historic environment at a project level. |
| SEA State of the Environment, Key Issues, and Objectives | Historic Environment Scotland (HES) | Our comments at scoping recommended that you broaden the scope of your baseline and objectives for the historic environment to encompass the broad range of interconnections between the historic environment and climate change. We note that you chose not to adopt this approach, and that this is reflected in the assessment findings. | The SIC Climate Change Strategy is a high-level document which determines the strategic direction of the Council’s climate action. It is our understanding that the interactions between the historic environment and climate change are better determined at a project- or plan-level, though this Strategy aims for these projects and plans maximise benefits to the historic environment wherever possible. |
| SEA Scope of Assessment | Historic Environment Scotland (HES) | For a number of SO assessment, the text commentary suggests that only effects on cultural heritage sites in the care of SIC have been considered. In the majority of cases it’s not clear why this very narrow baseline has been chosen for assessment, with a potential resultant failure to identify effects for the wider historic environment. | This Strategy document governs and aligns climate action within the Council as an organisation. There will be a separate document for the entire Shetland area developed by the Shetland Partnership and Climate Change Steering Group. Our understanding is that Shetland’s historic environment varies greatly from place to place which is why we have chosen to refer to a narrow baseline and rely instead on detailed assessments conducted for each resultant project. |
| SEA Assessment Findings | Historic Environment Scotland (HES) | The assessment has found neutral or unknown effects for the historic environment across all strategic objectives (SOs).  We agree that in some cases, interactions between the SO and historic environment are unclear or minimal. However, for a significant number of SOs, we would have expected the assessment to identify potential interactions and provide an assessment of likely effects appropriate to the level of detail of the Strategy, particularly under the themes of Energy, Buildings, Resources and Waste, and Nature Based Solutions.  Where specific spatial information is not available, it is often possible to make a meaningful generic or spatially high-level assessment. This is valuable in identifying mitigation and enhancement measures which can apply both to the Strategy in question, but will also be key to informing better environmental outcomes at lower, more spatially defined, levels. We consider this to be the case with a large number of the elements of this Strategy.  We consider that assessment at the appropriate level, and a broader approach to understanding the interconnections between the historic environment and climate change actions, would have enabled the assessment to identify ways in which the Strategy could better optimise the role of the historic environment in addressing the climate crisis, whilst also protecting and promoting the historic environment. For example:  • Strategic Objective (SO): Planning and decision-making which favours renewables within a holistic power system.  Renewable energy developments frequently raise issues for protection of the historic environment. We would expect assessment of this SO to explore the potential negative effects of renewable energy developments on the site and setting historic environment assets, and to also consider the cumulative effects of increased renewable energy developments.  • Strategic Objective (SO): Promote heat decarbonisation and energy efficiency across Shetland and increase levels of energy efficiency and net zero works occurring across Shetland buildings through skills development, building capacity, raising awareness and streamlining access to available funding.  Delivery of appropriate heat decarbonisation and energy efficiency in traditional and historic buildings may require different approaches, skills and materials to those needed for more modern buildings. We would have expected the assessment to identify a mix of positive effects from appropriate repair and retrofit, and the potential for negative effects where inappropriate measures are used. Mitigation and enhancement measures would embed the historic environment and its role in climate action into the Strategy, and also in lower level plans and actions. | The SIC Climate Change Strategy Strategic Objectives are developed with the aim of achieving favourable climate outcomes and do not preclude an approach to completing necessary climate works that acknowledges the importance of the historic environment in Shetland. It is expected that more specific and detailed plans and strategies which aim to complete these objectives will also aim to maximise benefits to the historic environment. |
| SEA Monitoring | Historic Environment Scotland (HES) | You have not set out how you intend to monitor the environmental effects of the Strategy. This information should be included in the Post Adoption Statement. | Primarily, the monitoring of environmental effects is expected to be agreed and detailed within future project plans that are created in support of this Strategy and future Action Plan. As previously stated, these projects will be site, area, or objective-specific which we believe warrants their monitoring schedules being the same. These will be supported by current environmental monitoring such as that completed for the Local Nature Conservation Sites. |
| Engagement with the wider Shetland economy (Not a Strategy section, but noted nonetheless) | Shetland Net Zero Energy Forum (SNZEF) | As we understand it, the main purpose of the SIC Climate Change Strategy is to provide a mechanism for the Council to demonstrate compliance with statutory requirements to reduce greenhouse gas emissions associated with its operations. In this regard, the strategy sets out strong governance arrangements for prioritising climate related decision making throughout the organization. The scope of the strategy also encompasses the external reach of Shetland Islands Council in decarbonising other sectors of the Shetland economy. Here we feel the strategy would benefit from increased engagement with the wider economy to develop a more ambitious strategy. For example, the strategy talks about influencing, inspiring, encouraging and expecting climate action but falls short in describing a strategic vision for other goals of the net zero transition, such as community wealth building through community or local ownership of revenue generating energy projects. There is an opportunity here to set out a strategy that is more ambitious and that more of Shetland can get behind. | The SIC Climate Change Strategy addresses the sectors that are under the Council’s direct control. There will be a separate strategy for the wider Shetland area, the Shetland Climate Change Strategy, developed by the Shetland Partnership and Climate Change Steering Group. This Strategy will deal with the wider Shetland economy more directly and will have a level of ambition matching that of Shetland’s civil society. |
| Measureable targets (Not a Strategy section but noted nonetheless) | Shetland Net Zero Energy Forum (SNZEF) | The strategy refers to monitoring and reporting as a means to understand the rate of progress being made toward the actions described in the Climate Change Action Plan, with analysis of progress against targets and data related to annual GHG emissions reported annually. However, the measurable emission reduction targets that are described in the strategy address net zero, waste and transportation only. Presumably other measures are outlined in the Climate Change Action Plan, but whether they exist as emission targets, interim targets or effortbased performance indicators is not stated, leaving us unable to determine if the Council’s plans are ambitious or achievable. More clarity in how the Council will measure and report its progress toward emission reductions would be helpful. A pictorial representation of a road map aligning activities, targets and dates would be helpful in showing comprehensively what the Council needs to achieve and when if net zero is to be reached by 2045. Ideally the strategy would be something that can be easily summarised in terms of targets that matter most to local folk e.g. “All Shetland homes insulated to level X by year Y” or “Heating costs down to the national UK average by year Z”. More information would also be helpful to understand how the Council is responding to its statutory duties as a public body. For example, the Heat Networks (Scotland) Act 2021 requires local councils to identify, consult on and designate potential heat network zones in their areas, and to conduct building assessment reports of non-domestic public sector buildings to determine if they are suitable to connect to a heat network. How does the Council’s Climate Change Strategy align with the Scottish Government’s objective of increasing the availability of electricity produced by renewable sources for transportation and industry by reducing its use for heat in homes and buildings? | The SIC Climate Change Action Plan contains key performance indicators for each of its aims, which will clarify plans to mitigate and adapt to climate change. Progress against these actions will be measured internally within the Council and will be reported on annually in a Climate Change Progress Report. This format of this report is as-yet undetermined, but will cover all of the actions and Strategic Objectives of the SIC Climate Change Strategy and Action Plan and will summarise the Council’s key climate activities in the report year. |
| Clarity and accessibility of the Strategy | Shetland Net Zero Energy Forum (SNZEF) | The Climate Change Strategy commits to clarity and accessibility, but the volume of supporting information tends in some cases to overwhelm the strategic content. At 61 pages, the current draft is not as accessible as it could be. Much of the background information about climate change and climate change planning is supplemental to the strategy and could arguably be moved to appendices. As outlined in (3), more clear and specific targets would be welcome. Furthermore, the strategy commits to accessible communications, but uses terms such as “strategically upgrade building fabric to minimize heat loss” (when “insulate” would be adequate) and although the term “co-benefit” is well explained, it is questionable whether the introduction of terms like this offer any benefit to the general reader. In summary: the strategy would be clearer if its goals were more specific – and it would be more accessible if it were more concise | The final draft of the Strategy text and formatting have been amended to include better signposting that clarifies which sections are background and supporting information and which are new strategic content. |
| Climate Change & Climate Risks to Shetland | Shetland Net Zero Energy Forum (SNZEF) | These sections contain general information about climate change that could be helpful to some readers but is secondary to the core strategic content: much of it might be better situated in an appendix. | The final draft of the Strategy text and formatting have been amended to include better signposting that clarifies which sections are background and supporting information and which are new strategic content. |
| Climate Change Targets | Shetland Net Zero Energy Forum (SNZEF) | General information about how climate change targets are set could be helpful to some readers but is supplemental to the strategy and is better suited to an appendix. Specific information about how SIC is responding to its statutory duties as a public body is directly relevant to the strategy and would be helpful to include in more detail in the strategy. | The final draft of the Strategy text and formatting have been amended to include better signposting that clarifies which sections are background and supporting information and which are new strategic content. The word choice of each section was carefully and thoroughly workshopped with relevant Council service areas to achieve maximum buy-in and to include a range of Council activities. |
| Mitigation and Net Zero, Adaptation, Just Transition, Co-benefits | Shetland Net Zero Energy Forum (SNZEF) | These sections contain general information about climate change that will be helpful to some readers but is supplemental to the strategy and is better suited to an appendix. Within Co-Benefit, there is no mention of the potential for local or community ownership of future revenue generating energy projects. The strategy could consider how our neighbour communities in Norway, Faroe – as well as Orkney and the Western Isles – have been more successful in maximizing returns to the local community from energy transition projects. Some of these examples could be listed in the document as stated examples to emulate e.g. Orkney windfarm which though smaller will generate more for that community than Viking, municipally owned energy in Faroe, community energy in Åland, etc. | The final draft of the Strategy text and formatting have been amended to include better signposting that clarifies which sections are background and supporting information and which are new strategic content. Maximising community benefit is one of the most desirable co-benefits of the SIC Climate Change Strategy. There will be a greater focus on community benefit in the Shetland Energy Strategy, which is in consultation at the time of this Statement’s publication, and in the Shetland Climate Change Strategy being developed by the Shetland Partnership and Climate Change Steering Group. |
| Net Zero Route Map and Data | Shetland Net Zero Energy Forum (SNZEF) | Key findings of the SIC Net Zero Route Map are directly relevant to the strategy and helpful context to understanding Council priority setting. The information provided however is quite detailed, and some of it could arguably be moved to an appendix. Information about the Shetland Net Zero Route Map will be helpful to some readers but is secondary to the strategy and as presented tends to muddy the waters somewhat around the scope and primary purpose of the SIC Climate Change Strategy. This could be tackled by layout/design (e.g. put Roadmap info in a different coloured box) or by moving some of the information to an appendix. | The final draft of the Strategy text and formatting have been amended to include better signposting that clarifies which sections are background and supporting information and which are new strategic content. |
| Strategy Development and Structure | Shetland Net Zero Energy Forum (SNZEF) | This section describes how the Council manages its own business well but more would be welcome on how the Council interacts with the community and private sector, and ideally would be co-developed with those people and organisations. | The SIC Climate Change Strategy addresses the sectors that are under the Council’s direct control. There will be a separate strategy for the wider Shetland area, the Shetland Climate Change Strategy, developed by the Shetland Partnership and Climate Change Steering Group. This Strategy will deal with the wider Shetland economy more directly and will have a level of ambition matching that of Shetland’s civil society. |
| Monitoring and Reporting | Shetland Net Zero Energy Forum (SNZEF) | Clarity and transparency of emission reduction targets and interim targets is needed. | The monitoring and reporting regime was elaborated upon in the SIC Climate Change Action Plan and in the Shetland Islands Council Climate Change Progress Report template submitted with the Strategy and Action Plan to Council. |
| Leadership and Governance | Shetland Net Zero Energy Forum (SNZEF) | The strategy appears to set out strong governance arrangements for prioritising climate related decision making throughout the Council. A strategic vision for achieving other goals of the net zero transition, such as community wealth building, is needed. | Co-benefits section, under economic benefits it was added: ‘Potential for local or community ownership of future revenue generating energy projects.’ |
| Money | Shetland Net Zero Energy Forum (SNZEF) | Decisions about the allocation of money and resources should place value on actions and projects that support long term community benefits as well as emissions reductions. As regards community wealth building, the elephant in the room is that more community and local ownership of revenue generating energy projects would be a direct path to increasing local economic benefit. | The SIC Climate Change Strategy’s Money section guides and aligns the management and distribution of the Council’s own funds. Community wealth building was nonetheless a desired outcome in the development of the Strategy. There will be a greater focus on community wealth building in the Shetland Climate Change Strategy being developed by the Shetland Partnership and Climate Change Steering Group. |
| Empowerment and Communications | Shetland Net Zero Energy Forum (SNZEF) | These sections emphasise one-way flow of information from the Council and do not recognise the significant experience and expertise within the local business community and organisations such as Shetland Net Zero. | The SIC Climate Change Action plan has further elaborated the numerous forums and opportunities for influence resulting from the objectives of the Strategy. The Action Plan is available on COINS. |
| Buildings | Shetland Net Zero Energy Forum (SNZEF) | Information about the requirements of the Council under the Heat Networks (Scotland) Act 2021 to identify, consult on and designate potential heat network zones. | Development of and consultation on possible heat networks will be developed as part of the Council’s Local Heat and Energy Efficiency Strategy (LHEES), the development of which is mandatory and part of the Climate Change Action Plan. This is expected to be completed in 2024. |
| Resources and Waste | Public | Why has there been no mention of creating a zero to landfill policy instead of extending the existing landfill site | Within the 5 year duration of this strategy landfill still will still be required for items such as asbestos and other materials which would be harmful if disposed of in any other way. |
| Buildings | Public | S.I.C. should develop a programme of installing solar panels on all S.I.C. buildings where practicable | Installing solar PV where appropriate is one of the actions in the SIC Climate Change Action Plan. |
| Transport | Public | SIC needs to have multiple EV charging points installed at all SIC properties where practicable. All schools should have EV charging points for staff and visitors. SIC needs, in partnership with communities, the scottish and UK governments to have fixed links built from the Shetland Mainland to Bressay, Whalsay, Yell and Yell to Unst | Completing and implementing SIC’s Electric Vehicle Infrastructure Expansion Strategy is a key component of transport in the Strategy. |
| Resources & Waste | Public | S.I.C. should broaden the range of domestic waste that it can recycle | Increasing recycling rates is a key component of Resources & Waste in the Strategy. |
| Leadership & Governance | Public | It is ridiculous to put climate change and Net Zero at the heart of decision making. Leading by example simply will not work and make us all poorer. | Noted |
| Alignment | Public | Perhaps alignment needs to be broadened to worldwide. If no else is on the same climate change path it is hardly worthwhile for the UK regions to go it alone. | The Strategy aligns with the United Nations’ Sustainable Development Goals and other international agreements on climate change. |
| Money | Public | I fear that many of the Climate Change/Net Zero ambitions will turn out to be wholly unaffordable. Some very difficult decisions will have to be made if extreme poverty for many is to be avoided. | Noted |
| Empowerment | Public | All views on climate change , including those who are sceptical about the extent of what can be done to prevent the climate changing for the worse. We need an frank and open debate about the whole strategy and just what can be achieved. | Noted |
| Energy | Public | Encouraging large scale wind power on these islands was a huge mistake. There is now a grave danger of even more large and inappropriate developments. Inherent difficulties with weather dependent resources may mean these types of project will ultimately be abandoned. | Noted |
| Buildings | Public | It is sensible to improve insulation in buildings. | Noted |
| Transport | Public | EVs are not necessarily a good solution here. Expense and charging issues do not make them an attractive choice, not to mention the dangers of lithium type batteries. | Noted |
| Resources & Waste | Public | Carbon capture and storage has yet to be proved to be viable or worthwhile. Waste to Energy produces GHG so is not completely a good solution. | Noted |
| Business & Industry | Public | Achieving net zero and delivering economic prosperity are not compatible. | Noted |
| Nature-based Solutions | Public | Protecting peatland has not been a priority to date where windfarms have been approved. Peatland should be left to evolve naturally, some of the so-called peat restoration that has been undertaken is little more than a token gesture. | Noted |
| Strategic Environmental Assessment | Public | Couldn't find a section with this title. | Every effort was made to make the documents accessible to readers, however we will always strive to make future consultation documents as clear and accessible for all readers and the technology they use. |

## How the results of any relevant consultation under regulation 14 of the Environmental Assessment of Plans and Programmes Regulations 2004 have been taken into account.

No trans-boundary consultations were undertaken under these regulations, as the SIC Climate Change Strategy is unlikely to have major effects on the environment of another Member State.

## The reasons for choosing the SIC Climate Change Strategy as adopted, in the light of the other reasonable alternatives considered

The scope of reasonable alternatives considered in the Environmental Report was limited because of political decisions taken by the Council prior to the adoption of the Strategy. In November 2022, the Shetland Islands Council Full Committee approved the Net Zero Route Maps and instructed the Director of Infrastructure Service to develop a Shetland Islands Council Climate Change Strategy and Action Plan using the data and recommendations gained through the Net Zero Route Map project, with a framework to allocate responsibility for actions and to measure, monitor, and report on progress.

The Strategy as it was adopted aligns with this instruction and with the recommendations of the Net Zero Route Map project, which also informs Shetland Islands Council’s net zero target of 2045. Alternative routes to achieving the same net zero and climate adaptation goals were considered during the Strategy’s development in workshops with service areas and senior management. However, these alternatives could not dilute the long-term outcomes of the Strategy. It was determined that no alternative considered would have significantly mitigated negative environmental outcomes or enhanced positive ones for two reasons:

1. Any changes made to the Strategy text must have achieved the same net zero or climate adaptation goal, which were already designed to maximise environmental co-benefits
2. Any changes made to the Strategy text will have been at a strategic level and would have been unlikely to impact the environmental effects of the desired outcome

## The measures that are to be taken to monitor the significant environmental effects of the implementation of the SIC Climate Change Strategy

Primarily, the monitoring of environmental effects is expected to be agreed and detailed within future project plans that are created in support of this Strategy and future Action Plan. As previously stated, these projects will be site, area, or objective-specific which we believe warrants their monitoring schedules being the same. These will be supported by current environmental monitoring such as that completed for the Local Nature Conservation Sites.

Any known significant environmental effects, positive or negative, will be reported on in the Nature-based Solutions section of the Shetland Islands Council Climate Change Progress Report. The SIC Climate Change Strategy is expected to be reviewed and renewed every 5 years and, should it require another environmental report at the time of its renewal, this Report will document any significant changes to the environment.