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EXECUTIVE SUMMARY

Background

1. In May 2010, the Scottish Government published a Draft Plan for Offshore Wind in Scottish Territorial Waters for public consultation. The Draft Plan set out aspirations for developing this sector, recognising the potential for offshore wind to make a significant contribution to targets for renewable energy generation as part of Scotland’s wider commitment to climate change mitigation.

2. In accordance with the Environmental Assessment (Scotland) Act 2005, a Strategic Environmental Assessment (SEA) was undertaken alongside the development of the Draft Plan. The findings of the assessment were set out in the Environmental Report, and public opinions on it, together with the Draft Plan, were invited.

3. The purpose of the consultation on the Draft Plan and its SEA was to encourage wide debate on the overall approach to offshore wind in Scotland. This report sets out the findings from this consultation process.

4. A total of 855 responses to the consultation were received, of which 118 were from organisations and the remainder (737) were from individuals. The level of detail and issues covered by the responses varied, from detailed concerns about specific developments, to broader perspectives on the Draft Plan as a whole and its SEA. Whilst not all consultees agreed with the approach to the Plan or some of its content, and others had considerable concerns about impacts on specific sectors such as fishing or navigation, the consultation process has ensured that these views have been expressed and can now be taken into account as the Plan is finalised.

Key Findings

5. There was a general view across the different types of consultees that the Draft Plan and its SEA provided an important first step in the process of strategically planning offshore wind development in Scotland. However, some concerns were expressed about the scale and pace of change it implies, and the balance that is being struck between environmental, social and economic concerns. Many people called for much more detailed assessment of the positive and negative social and economic implications of the Plan. This work is in progress.

6. The findings also show that there is extensive and direct regional and local opposition to the Solway, Wigtown and Kintyre short term options. Most of these concerns arise from the visual impacts from the developments, their size and proximity to the coast, and their perceived implications for local tourism sectors. There are also some more regional and local level concerns over the proposals for Tiree (Argyll Array) and Islay. In the case of Tiree, issue also relate to the impact on the island’s culture and population, its fragile environment and infrastructure.

7. In contrast, there is support for the Draft Plan and its SEA from other regions, including the North and East. In the Western Isles and Orkney, respondents
including the local Councils are seeking to progress more development in the short term than is currently proposed in the plan.

8. The fishing industry is concerned over the scale of short (2010-20) and potential medium (2020-30) term development and the related exclusion and displacement the industry will face especially if important spawning, nursery and fishing take zones are impacted. A combination of exclusion and hence increased local competition arising from displaced fishing activity were also raised as concerns.

9. The Shipping and Ports and Harbours sectors expressed concerns over the scale and position of developments off the Forth and Tay and within the Solway, and about large medium term options which have the potential to restrict access to the Minch and therefore require further consideration. The aviation industry is concerned that coastal airports may be affected especially for sites off the Forth and Tay, Tiree and Machrihanish.

10. Scottish Natural Heritage, some local authorities (Dumfries and Galloway Council and Argyll and Bute Council) the RSPB and Scottish Environment Link have raised concerns about the scale and location of proposed developments and in particular the overall environmental impacts of the Draft Plan as a whole, including some specific elements. The progression of a Habitats Regulations Appraisal (HRA) is expected to address many of these issues.

11. The offshore wind energy industry has generally welcomed the draft Plan and its SEA as an important first step in the process. However, it suggested that a regional, rather than site specific, approach would be more appropriate, to ensure that the SEA does not pre-judge environmental impact assessment (EIA) and mitigation that could be better addressed at a project level.

**Next steps**

12. A Habitats Regulations Appraisal (HRA) is currently underway, with the report due by the end of January 2011. In addition, the socio-economic assessment has now been commissioned, and will report within a similar timeframe. These two studies are of critical importance, and will be considered alongside consultee views on the draft Plan and its SEA.

13. All of the views expressed by consultees are being taken into account in finalising the Plan. It is considered important that the dialogue on offshore wind continues over the coming months. As a result, the Scottish Government will be undertaking further consultation events in early 2011 to:

- Provide feedback on the consultation analysis;
- Ensure that its assessment of consultee views is accurate and identify any further issues of relevance to the Plan;
- Explore the approach to finalising the Plan with consultees, to explore and test views on key decisions about its content.

14. The Final Plan and its accompanying post-adoption SEA statement will be published in March 2011.
1. INTRODUCTION

Background

1.1 In May 2010, the Scottish Government published a Draft Plan for Offshore Wind in Scottish Territorial Waters for public consultation. The Draft Plan set out aspirations for developing this sector, recognising the potential for offshore wind to make a significant contribution to targets for renewable energy generation as part of Scotland’s wider commitment to climate change mitigation.

1.2 In accordance with the Environmental Assessment (Scotland) Act 2005, a Strategic Environmental Assessment (SEA) was undertaken alongside the development of the Draft Plan. This process identified the significant environmental effects of the plan and its reasonable alternatives. The findings of the assessment were set out in the Environmental Report, and public opinions it, together with the Draft Plan, were invited. This report sets out the findings from this consultation process.

The Consultation Process

1.3 The Draft Plan and the SEA Environmental Report were published for consultation, and people were invited to submit their opinions on both. The Scottish Government recognised the critical importance of using the Draft Plan as a starting point for a nation-wide discussion of the scope for developing offshore wind in Scottish Territorial Waters. The SEA Directive states a clear requirement for ‘early and effective’ engagement of the public, and so opinions on the Environmental Report were also invited.

1.4 The consultation period was initially scheduled to conclude by 16 August 2010, but was extended for 6 weeks as a result of public feedback. The Plan and its Environmental Report were widely advertised.

1.5 In addition to the formal written consultation process, the Scottish Government held seven meetings with key sectoral stakeholders and organisations. In addition, 17 public meetings were held across the regions.

Table 1: Outline of the Consultation Process

<table>
<thead>
<tr>
<th>May 2010 Pre-consultation workshops</th>
<th>July 2010 Stakeholder Consultation</th>
<th>August - September 2010 Regional workshops</th>
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<tbody>
<tr>
<td>Offshore Wind Industry</td>
<td>Shipping, Ports and Aviation</td>
<td>Ullapool</td>
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<tr>
<td>Fishing Industry</td>
<td>Tourism and Recreation</td>
<td>Inverness</td>
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<tr>
<td>Shipping and ports</td>
<td>Scottish Renewables</td>
<td>Edinburgh</td>
</tr>
<tr>
<td>SEA Consultation Authorities</td>
<td>Scottish Coastal Forum /</td>
<td>Dumfries</td>
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<tr>
<td>NGOs</td>
<td>Scottish Environment LINK</td>
<td>Wigtown</td>
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<td></td>
<td>Institute of Ecology and</td>
<td>Campbeltown</td>
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<td></td>
<td>Environmental Management</td>
<td>Oban</td>
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<td></td>
<td>Aquaculture and fishing</td>
<td>Stornoway</td>
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<td>Kirkcudbright</td>
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<td>Islay</td>
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</table>
Overview of Responses

1.6 In addition to the views shared at the sectoral and regional workshops, a total of 855 formal responses were made to the consultation on the Plan and the Environmental Report.

1.7 Of the total number of responses 118 were received from organisations or businesses, and 737 from individuals. The following organisations provided responses:

Aberdeen City Council
Annandale & Eskdale Area Committee
Argyll and Bute Council
Argyll Renewables Communities
Association of Salmon Fishery Boards & Rivers & Fisheries Trusts of Scotland
Association of Wigtown Booksellers
Breaks Surf Shop
Briggs Environmental Services Ltd
British Ports Association
Campbeltown Community Council
Campbeltown Loch Berthing Company Limited
Campbeltown Trading Association
Chamber of Shipping
Civil Aviation Authority
Clyde Fishermen's Association
Colvend and Southwick Community Council
Comhairle nan Eilean Siar
Cree Valley Community Council
Danish Ministry of the Environment
Department of Enterprise, Trade and Investment
Discover Scotland
Douglas Hall Fisheries
Drummore Bowling Club
Dumfries and Galloway Council
E.ON
Fife Council
Fishermen's Association Ltd (FAL)
Forth & Tay Offshore Wind Developers Group
Fred Olsen Renewables Ltd
Friends of Hestan Island Association
Future Electric Limited
Galloway and Upper Nithsdale Liberal Democrats
Galloway Fisheries Trust
Galloway Static Gear Fisherman's Association
Garlieston Community Council
Gatehouse of Fleet Community Council
Gillespie Leisure Limited
Highlands and Islands Airports Limited (HIAL)
Highlands and Islands Enterprise
Historic Scotland
Infratil Airports Europe Limited
Natural England
Neart na Gaoithe - Mainstream Renewable Power
Newton Stewart Sub-Aqua Club
North Berwick Environmental Trust
Northern Ireland Environment Agency
Northern Lighthouse Board
Ochtrelure and Belmont Community Council
Orkney Islands Council
Portpatrick Community Council
Riders of the West
River Eden and District Fisheries Association
Royal Yachting Association Scotland
RSPB
Rusko Holidays
Scottish Boating Alliance
Scottish Borders Council
Scottish Campaign for National Parks
Scottish Canoe Association
Scottish Environment LINK
Scottish Environment Protection Agency (SEPA)
Scottish Fishermen's Federation
Scottish Natural Heritage
Scottish Renewables / RenewableUK
ScottishPower Renewables
Seaenergy Renewables Limited
SeaFish
Seagreen Wind Energy Limited
Shetland Islands Council
SLP Energy
Small Isles and Mull Inshore Fisheries Group
SMRU
SMRU Ltd/SOI Ltd
Solway Coast AONB
Solway Firth Offshore Wind Developer Group
Solway Firth Partnership
South Rhins Community Development Trust
sportscotland
1.8 In terms of the overall character of responses, as Figure 1 below shows, 82% of all the responses focused on three of the proposed short term options, whilst the remainder considered the Plan more broadly. Virtually all responses focusing on the specific short term options took the form of objections to the developments.

**Figure 1**

![Distribution of responses by type](image_url)

- Kintyre: 35%
- Solway Firth: 24%
- Wigtown Bay: 23%
- Other comments: 18%
1.9 Figure 2 below maps the geographic distribution of individual respondents who agreed to use and publication of their information. This shows clusters of interest around areas where development is proposed in the short term, including Tiree, Kintyre and the South West.

Figure 2
### Report Structure

1.10 Consultees were asked to focus their responses on twelve questions, although more general opinions were also invited. This report of these views is not a summary of each individual response, instead it sets out the analysis of the key issues and common themes emerging from the process as a whole. Based on the consultation questions, the remainder of this report is structured as follows:

<table>
<thead>
<tr>
<th>SECTION</th>
<th>INTRODUCTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION 2</td>
<td>COMMENTS ON THE SELECTION OF OPTIONS</td>
</tr>
<tr>
<td>1</td>
<td>Does the mapping of exclusion zones, environmental issues, and technical issues provide a reasonable basis for modelling the options?</td>
</tr>
<tr>
<td>2</td>
<td>Do you have any further technical or environmental information you think we should take into account as we refine the Draft Plan?</td>
</tr>
<tr>
<td>3</td>
<td>Do you consider that the Draft Plan presents a practical set of options?</td>
</tr>
<tr>
<td>SECTION 3</td>
<td>COMMENTS ON SPATIAL OPTIONS FOR DEVELOPMENT</td>
</tr>
<tr>
<td>4</td>
<td>Should any options be removed from the Draft Plan?</td>
</tr>
<tr>
<td>5</td>
<td>Are there other options we should consider in the medium or long term?</td>
</tr>
<tr>
<td>12</td>
<td>The Draft Plan has identified environmental and technical issues in the north and north west regions of Scotland, in particular. It may therefore be reasonable to give further consideration to these regions. Do you think that development in these regions, or individual options within them, should be given lower priority or perhaps deferred to the long term?</td>
</tr>
<tr>
<td>SECTION 4</td>
<td>COMMENTS ON THE SEA FINDINGS</td>
</tr>
<tr>
<td>10</td>
<td>The SEA has identified that there could be significant adverse effects, from the Draft Plan as a whole, on Scotland’s landscapes and seascapes. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have a view on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?</td>
</tr>
<tr>
<td>11</td>
<td>Do you have any other views on the findings of the SEA? Do you think that all the environmental effects (positive and negative) have been identified? Are there other issues that we should be taking into account in the preparation of the Draft Plan.</td>
</tr>
<tr>
<td>SECTION 5</td>
<td>COMMENTS ON THE OVERALL PLAN</td>
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<tr>
<td>6</td>
<td>How can the Draft Plan be improved? What should be taken forward differently and why?</td>
</tr>
<tr>
<td>7</td>
<td>Do you have views on the scale and pace of development that could be sustainably accommodated in Scottish Territorial Waters, taking into account the findings from the SEA and the technical assessment?</td>
</tr>
<tr>
<td>8</td>
<td>Have we got the balance right in the Draft Plan, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts?</td>
</tr>
<tr>
<td>9</td>
<td>The Plan, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often should this be done and why?</td>
</tr>
</tbody>
</table>

### Analysis of Consultation Responses
2. COMMENTS ON THE SELECTION OF OPTIONS

Overview

2.1 This section of the report focuses on the first three questions included in the offshore wind Draft Plan for consultees. These questions aim to explore the information and process that was used to identify the options for development, which were subsequently environmentally assessed and used to form the basis of the Draft Plan where appropriate. The responses to each of the questions are explored in turn.

Question 1: Does the mapping of exclusion zones, environmental issues, and technical issues provide a reasonable basis for modelling the options?

2.2 The development of the Draft Plan was informed by detailed consideration of a range of options for development. The options were identified using The Crown Estate’s Marine Resource System (MaRS), a tool for layering environmental and technical information which was used to ascertain where development may or may not be sustainable as a result of the baseline conditions. Question 1 invited views on whether the mapping used to identify the options for the SEA was considered to be reasonable. 60 consultees responded to this question, including the following organisations. The graph below sets out the overall distribution of views:

Aberdeen City Council
Argyll and Bute Council
Argyll Renewables Communities
Chamber of Shipping
Civil Aviation Authority
Comhairle nan Eilean Siar
Dumfries and Galloway Council
Fife Council
Galloway and Upper Nithsdale Liberal Democrats Constituency Party
Galloway Static Gear Fisherman's Association
Highlands and Islands Enterprise
Historic Scotland
Institute of Ecology and Environmental Management
Maritime and Coastguard Agency
Ministerie van Verkeer en Waterstaat
Moray Firth Partnership
National Federation of Fishermen's Organisations
NATS En-Route Ltd (NERL)
North Berwick Environmental Trust
Royal Yachting Association Scotland
Scottish Boating Alliance
Scottish Natural Heritage
Scottish Renewables / RenewableUK
ScottishPower Renewables
Seaenergy Renewables Limited

1 For references throughout the following sections, a map is provided at the end of this document, showing the options that were included in the Draft Plan.
First Step in the Process

2.3 The majority of respondents to this question viewed the MaRS mapping as a reasonable starting point for identifying the options. 27 respondents provided a positive response, of whom 19 provided additional comments. There was a general consensus amongst those who commented that the options should be considered a first step, acknowledging that more work is needed before sites can be designated for development.

2.4 The Royal Yachting Association Scotland (RYAS) felt that the mapping was a good way of identifying options, providing that the data limitations and sensitivity weightings were borne in mind. RYAS also felt that the datasets used had improved significantly as a result of consultation with stakeholders during the pre-consultation workshop process.

2.5 The Highland Council felt that the mapping provided a reasonable indication of where development could come forward and where onshore development may be required. Aberdeen City Council was generally supportive of the approach, although it was acknowledged that options could change given data gaps and uncertainties at this stage, and the need to explore scope for mitigation of impacts.

2.6 Comhairle nan Eilean Siar (Western Isles Council) was also broadly supportive of the approach to layering static zones and constraints, noting that MaRS had been well used by Marine Scotland in regional locational guidance.
However, it also acknowledged that this could be difficult for industries including fishing and the mobile and static gear sectors and that a finer grain of analysis was required to better reflect interests. It suggested further work with the industry to map existing activity, assess impacts and identify mitigation. The Institute of Ecology and Environmental Management (IEEM) and VisitScotland also considered it to provide a good basis upon which more detailed assessment could be based.

Limitations of MaRS

2.7 At least 23 consultees felt that approach was not robust, primarily due to concerns about the basis of the data used. The Moray Firth Partnership agreed this approach was reasonable at a strategic level, but noted that further consideration of cumulative impacts was required to provide a fuller picture. A similar view was provided by the Argyll Renewables Communities, which emphasised the need for further consideration of impacts on communities: an issue which is not readily mapped.

2.8 Although Scottish Natural Heritage (SNH) was involved in discussions on the use of MaRS within this process and did not object to its use or the methodology applied, it nevertheless expressed concerns about the use of MaRS, particularly arising from the assumptions adopted and the use of environmental data. Data sources and weightings were questioned, and it was suggested that greater recognition be given to the limitations of this tool, including data gaps and the consequent reliance on expert judgement to the outputs. SNH emphasised that MaRS is a decision support tool, not a decision-making tool, and therefore viewed it as an aid to identifying constraints that then require further evaluation in association with statutory consultees. In the meantime, SNH recommended restraint particularly in the north and north west until further constraints mapping has been undertaken and the Habitats Regulations Appraisal (HRA) concluded. Further, more specific advice was offered on MaRS, and has subsequently been discussed with SNH.

2.9 Scottish Environment LINK was concerned that MaRS has a ‘commercial bias’ and suggested that it could only be useful for mapping protected sites. Shortcomings in terms of mapping areas of environmental sensitivity for species and habitats for which designated sites do not exist were emphasised. Exclusion of Nature Conservation Marine Protected Areas (MPAs) that will be designated in the future was a particular concern. LINK suggested that the only additional (non-MaRS) data considered within the planning process related to fishing and shipping activity.

2.10 Similarly, Dumfries and Galloway Council had serious concerns about the mapping, based on the absence of information on salmon, vessel movements and socio-economic issues. Argyll and Bute Council found it difficult to interpret the maps provided, and were concerned that the technical constraints were not more fully described in the document. They also felt that the analysis was undermined by a lack of information on onshore developments and transmission networks.

2.11 Similar views were raised by individuals who suspected that the information may be ‘faulty’ or incomplete. Examples were noted where specific options had been included in the Draft Plan despite their perceived environmental shortcomings:
notably the Argyll Array and Kintyre. Some felt that this illustrated the shortcomings of the option selection process. However, it should be noted that the MaRS modelling used to identify medium term sites was not used to outline the 10 short term sites.

Further information to inform the options

2.12 Numerous detailed suggestions for different datasets and weightings were made, and these are discussed in more detail in relation to Question 2.

2.13 Several consultees, including SEPA and Scottish Environment LINK, suggested that the approach would be more robust if it had been linked with marine planning, and / or if it better reflected other considerations including the grid and wave and tidal developments.

2.14 A more integrated view was supported by other consultees who provided considerable detail on the additional information that should be used to inform the identification of options for the Plan. For example, the Moray Firth Inshore Fisheries Group were concerned that marine energy outside of territorial waters had not been included, as well as wave and tidal development potential and test locations, cabling, navigation corridors, existing infrastructure and current marine energy suppliers, and areas that may become available as a result of technological or production advances. The group also recommended that no assumptions should be made about exclusions from wind farms or cable runs and that more mapped information should be gathered to inform the assessment findings on fishing. This view on assumptions was supported by The Crown Estate.

2.15 The Sea Mammal Research Unit (SMRU) expressed concerns about the data used in the options mapping, and in particular that marine mammal and bird data had been confined to distribution of interests on land and designated sites and their marine extensions. As a result it suggested that coverage of highly mobile species was poor, even although data exist for this and could be deployed. Further detailed advice on how this could be remedied was provided, including for the HRA to take into account. The Whale and Dolphin Conservation Society stated that The Crown Estate considered MaRS to be inappropriate for recording species with no spatial protection such as cetaceans. The lack of designated sites for bottlenose dolphins was raised to illustrate this.

2.16 Others were concerned that environmental matters were too heavily weighted within the mapping, at the expense of issues which could be less easily mapped including social and cultural characteristics.

Transparency

2.17 Several responses focused on the accessibility of information on data used for the mapping and the presentation of mapping outputs. SLP Energy sought reassurance that the mapping has been fair, and that areas have not been viewed as more constrained simply because more information is available on its environmental character.
2.18 The Maritime and Coastguard Agency (MCA) requested that mapped information be provided in a format that would allow it to be linked to nautical charts and publications, and other designations, thereby allowing for a more accurate assessment of maritime risk. Similarly, the National Federation of Fishermen's Organisations (NFFO) asked for more detailed boundaries to allow for a fuller response. The limitations of the fishing data (from COWRIE) used in the mapping was noted. The NFFO was also surprised that fishing was given a lower weighting than other activities, and strongly argued with this decision.

2.19 A more transparent approach with explicit acknowledgement of data gaps was called for to address this issue. Terminology was also discussed, for example, SeaEnergy Renewables suggested that the terms ‘environmental’ and ‘technical’ could be clarified, and that ‘biological’ and ‘human environment’ would be more consistent with EIA, thereby assisting developers. Some consultees, including Scottish Renewables, asked for more explanation of the weightings used within the analysis.

2.20 The Highland Council sought further explanation of exclusion areas. It noted that whilst some significant constraints may not merit exclusion status, in practical terms they could preclude some developments. It recommended that areas should only be excluded on the basis of robust evidence, and that if there was any doubt, areas should be included in the Plan, with constraints clearly indicated. This could then steer further data collection. In a similar vein, other individuals and organisations questioned why features such as pipelines and cables were exclusions, but environmental issues had been treated as more flexible.

2.21 A broader point was raised about consistency by several consultees and in particular the fact that the analysis using MaRS only applied to the selection of medium term options, and that the criteria used for short term options had not been made explicit. Scottish Environment LINK for example felt that it would be useful to understand the decision making process that had led to these areas being recommended. SNH viewed this as a regrettable situation.

Concern about local level analysis

2.22 Industry representatives, including the Forth and Tay and Solway Firth Wind Developers Group, SSE Renewables and Future Electric were concerned about trying to achieve too high a degree of certainty at this scale, suggesting the approach should be more strategic and less site specific. Partly, this was based on a view that it would be inappropriate to rule out areas that had not been included as options at this stage. Supporting industry views, both the Highland Council and Highlands and Islands Enterprise felt that the mapping was reasonable at a basic level, but suggested that areas should not be excluded at this stage without further investigation and additional information.

2.23 Several consultees suggested that it would be more useful to link or express the mapping of options in terms of generating capacity. Scottish Power Renewables (SPR) felt that the approach taken was only feasible for the short term, and that further industry input on technical constraints would be required to better define
longer term constraints. SPR was concerned about undue application of the precautionary approach when identifying options in the meantime.

2.24 Scottish Renewables discussed this further. Whilst the approach was considered to be reasonable at a simple level, it was suggested that it would be more appropriate for it to signpost suitable areas and avoid marking others as unsuitable. They suggested that developers would naturally avoid sensitive areas, and that the study should provide only general direction as to the spatial composition of development areas.

2.25 This contrasted with the views of some individuals who were concerned about ‘adopting’ sites on the basis of broad or partial information at the national level. Some people felt that the only option considered for the Plan was to progress development, and that this was not supported by the evidence provided.

**Question 2. Do you have any further technical or environmental information you think we should take into account as we refine the Draft Plan?**

2.26 A range of consultees provided further information in response to this question. This included industry representatives, environmental organisations and local authorities.

2.27 Some consultees commented on the availability and accessibility of information that had been referred to in the Draft Plan or its SEA. Building on responses to Question 1, this included advice on the use and presentation of mapped data. Some were concerned about too many layers or imprecise boundaries, and also focused on the weightings ascribed to different layers. These are discussed in more detail below.

**Further technical and environmental information suggested by consultees**

2.28 Virtually all of those who responded to this question suggested further information. This was wide ranging, and included the following:

1. *Further reference to onshore development, including grid connections and support facilities.*

2.29 The Highland Council and Fife Council recommended that clearer links are drawn with the National Renewables Infrastructure Plan (N-RIP), and the former referred to relevant regional work set out in the Highland Renewable Energy Strategy (HRES). It was noted that the options for development within the Draft Plan varied from those identified in HRES, and therefore suggested that it may be useful to check why this has arisen as a means of cross referencing the options in the Draft Plan and testing the evidence base.

2.30 Others focused on grid connections and capacity, and felt that a fuller picture would only emerge if these issues were taken into account more fully in the identification of options.
2.31 Argyll and Bute Council felt that the Draft Plan missed an opportunity to consider onshore infrastructure requirements, such as ports, harbours, workforce housing requirements, electricity convertor stations and other buildings and infrastructure. It was pointed out that without this information it was difficult to fully define cumulative effects of developments, particularly for option areas located close to shore.

2.32 SNH considered that the failure to address cabling connection activities within the Plan was a major omission, and recommended that the impact of this aspect was given further consideration. It also recommended further consideration of onshore activities associated with offshore construction, but acknowledged a need for further thinking on how this could be achieved.

2. Further information on other aspirations for energy generation.

2.33 Some consultees felt that the options mapping should take into account test and demonstration sites, with one asking for clarification of the levels of generation that classified sites as such. Several also asked for fuller analysis of wind speeds in relation to the options.

2.34 References were also made to links with aspirations for wave and tidal energy generation, particularly by those that viewed this as a reasonable alternative to offshore wind energy development generally. For example, Keep Wigtown Bay Natural felt that there should be further consideration of tidal opportunities in the Solway as a broader alternative to the Plan.

2.35 Comhairle nan Eilean Siar suggested that information gathered for the Saltire Prize Regional Location guidance would be helpful. SSE Renewables asked for reference to be made to the UK wide plan for future leasing of offshore wind and oil and gas, and gas storage, cables for exporting energy, Round 3 sites and landfall connections for the zones around the Firth of Forth and Moray Firth.

2.36 Several consultees suggested that a more generalised approach to identifying options would be preferable, for example defining the energy generation capacity of regions instead of going as far as identifying spatial options. Some felt that the options and therefore the Plan would benefit from further exploration of the carbon footprint of manufacture, erection and operation of wind farms, to provide a fuller picture of the net benefits of development. Specific questions were asked about whether information on the output levels and timing of Robin Rigg might provide a more accurate view of the generating capacity of offshore wind.

3. Further socio-economic information.

2.37 A range of additional socio-economic information was raised by consultees, who recommended that it is incorporated into the selection or analysis of options. Some of this information related to specific regions and developments. For example, the Tiree Community Development Trust referred to socio-economic impact assessment work planned for the three short term sites in Argyll and noted that further baseline surveys were required to better reflect the characteristics of west coast communities that could be affected by proposals within the Plan. Several
consultees felt that the vulnerability or fragility of communities cannot be mapped and does not therefore feature within MaRS, but was nevertheless an issue that should be considered within the options appraisal.

2.38 Several organisations suggested a need for further information on recreation. Data on surfing, coastal access areas and paths and sea angling were all raised. Several consultees commented that there is a need for more mapped information on tourism to be built into the options.

4. Further information on fishing

2.39 The fishing sector as a whole was concerned about the data used in the MaRS options analysis, and the weightings applied to it.

2.40 The SFF noted that it was willing to share information of fishing at a finer grain than had been used in the assessment, if it would lead to a review of the short term options within the Plan. The NFFO felt that the Plan is likely to have been misinformed as a result of the deficiencies of the fishing data used. It supported further assessments and requested further involvement. They suggested that the Cumbria Sea Fisheries Committee and Irish Sea Marine Conservation Project may be able to provide further information on fishing activity.

2.41 The West of Four Fisheries Management Group (WOFFMG) sought more information on commercial fishing, and for it to be given highest priority. The Small Isles and Mull Inshore Fisheries Group found it difficult to comment as they were unclear about the data that had been used to evaluate the impact of the plan on commercial fishing. However, the distribution of the options proposed suggested a lack of fishing data, and the group was concerned that fishing had not been treated as a material asset within MaRS. Consideration of gross value of landings was considered to be too broad and weighted in favour of larger vessels with higher gross revenue, at the expense of smaller vessels that more directly support rural communities. They agreed with the SFF that a finer resolution of data was required, and that the weighting valuing recreation over fishing was wrong.

2.42 The Scottish Sea Angling Conservation Network was concerned that they had not previously been involved in the research, and noted that many of the options were close to sensitive areas. Detailed supplementary information was provided in its response.

2.43 The Dutch Government suggested that the assessment could be more specific about cabling requirements and its environmental effects. They reported having further information on cumulative effects, and the effects of construction on fish larvae and the wider food chain.

2.44 Other consultees noted the need to consider aquaculture licenses to gain a more complete picture of commercial activities.
5. Further information on shipping and navigation.

2.45 Some consultees referred to national level information on shipping, whilst others provided specific information about their region.

2.46 The Maritime and Coastguard Agency (MCA) suggested that the guidance on Offshore Renewable Energy Installations and wider maritime and MPA information needs to be brought together to provide a fuller assessment of the options.

2.47 Dumfries and Galloway Council provided further information on shipping in order to demonstrate why, in their view, Wigtown Bay should be removed from the Plan.

6. Aviation information

2.48 The Civil Aviation Authority provided further detailed information on aviation issues, covering terminology, distances and buffer zones. It was noted that these issues will be addressed at the project level, but also suggested that further consideration could be given to the cumulative impacts of options on aviation at the plan level, including accumulation with onshore wind turbines. Further information on the relationship between options in the south west and their interaction with aviation to and from the Isle of Man and Northern Ireland was requested.

2.49 Reliance on British Wind Energy Association (BWEA) data within the assessment was criticised by air industry representatives and suggestions were made on additional information, including North Sea helicopter routes and longer distance flight paths.

7. Other technical issues

2.50 The MoD provided specific information on their activities and potential for interference with air traffic and air defence radar systems. It was noted that Practise and Exercise Areas (PEXA) had been shown as a technical issue within the analysis, and confirmed that there may be some scope to accommodate development in these areas, depending on case by case circumstances. The approach of using buffer zones around radar facilities was not supported, as the MoD uses actual radar coverage data and line of site assessments to provide a clearer picture of potential impacts. It was noted that the assessment does not cover precision approach radar systems at military aerodromes, Ministry air traffic control facilities which are not located at aerodromes and air defence and meteorological radar sites.

2.51 Localised hazards were also noted, included the need to identify the risk of live ammunition shells next to Dundrennan MoD range.

8. More detailed environmental information.

2.52 Many of the respondents focused on additional, or more detailed environmental information that could be built into the assessment of options.
2.53 This included further bathymetric information and bird data, including the location of gannet colonies, breeding grounds and fishing grounds. E.ON suggested including further information on the disturbance of marine mammals, seal breeding colonies, foraging seabirds and their habitats, barriers and disturbance to migrating mammals, fish and birds, spawning and nursery grounds of Biodiversity Action Plan (BAP) species.

2.54 Several consultees also noted the importance of taking into account impacts on proposed Marine Protected Areas, including Environment LINK (see below).

2.55 The need for a Habitats Regulations Appraisal (HRA) was raised by some consultees at this stage, including Scottish Natural Heritage (SNH). Advice included the need to consider possible Special Protection Areas (SPAs) within the assessment, as well as those which are more formally proposed. SNH also suggested that further consideration be given to mobile species (birds and marine mammals), and that this is explored as an integral part of the HRA. It was noted that SNH is currently compiling a list of Priority Marine Features (PMFs) for inshore waters, whilst the Joint Nature Conservancy Council (JNCC) is compiling a list for offshore areas (beyond 12nm), and that these should be considered further when they become available.

2.56 Some specialist respondents focused on bats. It was noted that they are at risk of turbine strike, and that Swedish studies have demonstrated that bat activity can extend 10km offshore. As a result, further survey work was suggested to provide a more accurate estimation of mortality. It was also noted that this is most pertinent to the South West Region where the most at risk of the Scottish bat populations exist – noctules, Leisler's bat, soprano and common pipistrelle.

2.57 A good number of consultees asked for further information on marine mammals to be built into the process. Suggestions included referring to SNH's 2009 information on basking shark hotspots, and providing further data on cetaceans generally, and specifically in the Solway Firth. The Whale and Dolphin Conservation Society noted the urgent need for research to fill data gaps and provided a full list of additional references. The importance of satisfying the Habitats Directive requirements was noted, and particular concerns about pile driving were raised.

2.58 Landscape information was also raised by several consultees, with consultees suggesting that the assessment would benefit from more up to date landscape / seascape and visual impact methods. Some consultees suggested the use of further information including non-designated landscape, key views, sensitive areas close to shore, scenery that has important links with local tourism, and the setting of the coastal historic environment. Further regional level landscape character information was provided by some consultees, for example additional evidence from Dumfries and Galloway council of particular relevance to the Wigtown Bay proposal.

2.59 The Scottish Campaign for National Parks and some others suggested making use of SNH information that was used to inform the establishment of a coastal and marine national park in 2006.
2.60 With regard to cultural heritage, Historic Scotland noted that there are gaps in knowledge of submerged archaeology, and noted the approach had referred to zoned areas where there is a possibility of submerged prehistoric landscapes. This data was considered to be very coarse, requiring further refinement to assess significant effects, and it was noted that in England and Wales this work is being undertaken regionally, as opposed to leaving it to the project level. It was suggested that a co-ordinated programme in Scotland is required to address this, particularly around the Western and Northern Isles. The Northern Ireland Environment Agency (NIEA) stated that account should also be taken of the Giants Causeway and Causeway Coast World Heritage Site in Northern Ireland.

2.61 Water quality was also raised as an issue that could be better reflected in the SEA through further baseline information, including the status of waters in relation the Water Framework Directive.

2.62 Scottish Environment LINK was concerned about data gaps at a strategic level, and sought adequate resources to fund the research required to match the proposed pace of development. This included research on wildlife baseline data, including monitoring of international studies and research. They proposed that SNH leads the preparation of GIS data on all known sensitive marine sites and features, drawing on knowledge held by environmental stakeholders. This should be made publicly available, updated as appropriate, and applied to decision making.

Broader comments

2.63 More generally, it was noted that environmental information is being gathered collaboratively at a regional level by developers assessing cumulative developments, under the terms of their agreement with the Crown Estate. Some consultees also suggested that trend information should be built into the baseline to ensure that it remains a relevant reference point for assessing the likely effects of medium and long term options.

2.64 Some consultees recognised that there may not be scope to integrate this information at a strategic level, but suggested that information should be flagged up at this stage for further consideration at the project level within Environmental Impact Assessment. This included numerous replies from prospective developers, who will have responsibility for gathering information at this level. The West Coast Offshore Wind Developer Group suggested that it may be possible to scope ‘water’ out of the assessment at the regional level, based on information gathered on the west coast. Others, such as fishing interests, disagreed with this view and stated that information needs to be gathered and evaluated at the plan level, to avoid taking forward unsustainable options. Scottish Renewables felt that the status of the options should be clarified to provide more certainty about the effect of classification.

2.65 Some concerns were raised about the way information had been presented. For example, SeaEnergy Renewables were concerned that some specific leases (e.g. for wave at Portnahaven) had been named in the exclusion category, and suggested a more general reference to this to ensure that updates to agreements can be taken into account. Scottish Renewables felt that some of the mapping was
unclear, and that the figures caused confusion by bringing together too many layers. Some also considered the presentation of information in Table 4.3. to be unclear.

2.66 Some consultees also asked how the data used in the study had been verified. Specific points were made about whether some datasets were up to date.

| Question 3: Do you consider that the Draft Plan presents a practical set of options? |

2.67 A total of 53 consultees responded to Question 3, including most of those who answered Question 1.

Options considered to be practical

2.68 Some consultees were content that the options were practical, including some organisations (RYA Scotland, Scottish Boating Alliance, Tiree Community Development Trust, North Berwick Environmental Trust, Comhairle nan Eilean Siar and Fife Council) and several individuals. The Highland Council considered the options to be a good starting point, but noted that they should be updated to reflect further development of technology. Aberdeen City Council provided a similar view. VisitScotland were content with the options, providing that scenic value formed an equal part in their selection. Others felt that this question was difficult to answer, particularly in the light of their views on the breadth and depth of data used.

Options considered to be too detailed

2.69 Others suggested that the options were not appropriate for a national level plan. Instead they recommended consideration of higher level alternatives. This was particularly the view of industry respondents who were concerned that it was impractical and inappropriate to prejudge project level assessment at the national level. Scottish Renewables agreed that the nine remaining short term options should form the core of the Plan, and that other options would be needed in the future. However, it was felt that these would be better supported within a broader marine planning context and within future reviews of the Plan as a whole. Several consultees repeatedly referred to the importance of better links with marine spatial planning, within the context of the Marine (Scotland) Act.

2.70 Some suggested that focusing on what was perceived to be project level options was too limiting, calling into question the viability of development outwith these areas at a premature stage, and potentially stifling development of the sector. This included industry representatives and Comhairle nan Eilean Siar, who felt that the Plan should be more ambitious and take into account technological developments including demonstration projects that aim to unlock technology for wind in deeper waters.

2.71 Again, the issue of how the options collectively relate to national renewables targets was raised. People suggested that in the absence of MW based target, it was difficult to conclude whether or not the options presented were appropriate.
Some questioned whether the options represented the maximum area that could feasibly be developed, or was based on a less comprehensive approach. Others felt that the Plan appeared to be aiming to fulfil an assumed target (50% generation) that was not underpinned by robust evidence.

2.72 Further consultees suggested that the options should be viewed alongside opportunities for other technologies including wave and tidal, as also noted in responses to Questions 1 and 2.

2.73 Comparisons were drawn with the UK wide offshore energy SEA, and it was suggested that the options could be explored at a more strategic level by comparing, for example, the effects of (1) not offering areas for leasing (2) proceeding with the leasing programme or (3) restricting areas offered for leasing temporally or spatially.

2.74 The RSPB also suggested an alternative approach, including exploration of the ‘do nothing’ option or consideration of the maximum level of development that could be achieved within the short and medium term areas. It was of the view that the SEA had only considered alternatives within the plan, and that further exploration of broader alternatives to the Plan as a whole would be useful. The RSPB also suggested that the thirty short and medium term options should be scored to allow for a fuller comparison of their performance.

2.75 Scottish Environment LINK felt that there had been inadequate consideration of alternatives in the SEA. They suggested that there is a requirement for SEA to explore the ‘do nothing’ alternative and for full explanation of how the assessment was undertaken and ‘the reasons for not adopting the alternatives considered.’ They, like the RSPB, were concerned that the SEA had focused on alternatives within the Plan, as opposed to alternatives to the Plan.

Information gaps

2.76 Some questioned the practicality of some or all of the options on the basis of a lack of robust information to underpin their assessment, as had been discussed in responses to Questions 1 and 2. This included the shipping and fishing sectors. The shipping sector suggested that without a fuller assessment of the interplay between STW developments, Round 3 and MPAs, it would not be possible to identify whether options were practical. Specific practical issues arising from medium term options in the Minches were raised to illustrate the difficulty the sector had in defining any of the options as feasible at this stage.

2.77 The SFF suggested that there had not be consideration of any option other than to progress development. Other fishing interests reinforced comments raised in response to Questions 1 and 2 by noting that the options could not be regarded as practical, unless they were informed by much more comprehensive data on commercial fishing, including activity by smaller vessels. The NFFO were clear that some of the options were impracticable from the commercial fishing perspective.

2.78 Logistics, including availability of port facilities, distance from option areas to the grid, cost of grid connections and potential for power loss over transmission distance to the end users were all raised. Comhairle nan Eilean Siar noted that the
grid if often cited as a constraint to offshore wind energy and noted the expectation that a 900MW interconnection between Lewis and the mainland will be in place soon. Some felt that the options were impractical as they did not reflect wind speeds, rendering some specific areas unjustifiable.

2.79 The need for the HRA to be undertaken to establish the suitability of the medium term options was also noted by some consultees.

Inappropriate options

2.80 Some respondents did not view specific options as practical because they included specific sites that they felt were inappropriate. This included several respondents focusing on their opposition to the short term sites at Wigtown Bay and Kintyre. Cumulative effects arising from groups of options, particularly in the West region were also raised to illustrate that the overall level of development proposed by the Plan was unlikely to be practical, given the need for a precautionary approach. These are explored in the spatial and regional analysis provided in Section 3.

Practicality over sustainability?

2.81 Whilst some consultees considered the options as impractical, others felt that practicality appeared to have been prioritised over other considerations including their environmental and socio-economic impacts.

Conclusion

2.82 Several consultees gave considerable thought to the process of identifying options that form the basis of the Draft Plan. The diagram below maps the key issues identified in relation to Questions 1, 2 and 3. This shows that views ranged from comments on the role and status of the options, to practical suggestions on additional data sources.
3. COMMENTS ON SPATIAL OPTIONS FOR DEVELOPMENT

Overview

3.1 This section of the report sets out the responses to Questions 4, 5 and 12 of the consultation. These questions focused on the spatial options for development within the draft Plan. Question 4 sought views on whether any options should be removed from the plan, and Question 5 explored whether there were any options that consultees felt should be added. Question 12 asked for views on possible regional prioritisation within the Plan.

3.2 These three questions generated a significant proportion of the total number of responses to the consultation. This is very useful, given that the draft Plan was developed with the specific aim of encouraging a much fuller exploration and discussion of the spatial options for offshore wind energy development in the short, medium and longer term.

3.3 Given the extent of the responses to these questions, the following section have been set out in relation to each of the regions within the draft Plan. Views for each region incorporate specific comments on the short term sites.

3.4 In addition to formal consultation responses, a series of regional events were held in a number of locations throughout the country, to ensure that local views were accurately gauged as part of the consultation process. The key points raised in each of the workshops have been brought together with the formal written responses to provide a more comprehensive evaluation of views in each area.

Question 4: Should any options be removed from the Draft Plan?

Overview of responses

3.5 In summary, many consultees gave a definitive answer to this question, highlighting a specific site that they felt should be removed. This included a particularly large number of comments on the proposals at Kintyre, Wigtown Bay, Solway Firth and, to a lesser extent in terms of numbers, the Argyll Array.

3.6 Comments on one or more of the regional medium term options were also made by many respondents, including suggestions to remove specific option areas in the West, South West, East and North.

3.7 The graph on the next page illustrates the broad distribution of responses between the regions included in the Plan:
3.8 Some consultees believed no options should be removed from the draft Plan. This included the Royal Yachting Association, Scottish Boating Alliance, Future Electric, SSER, The Highland Council, and Historic Scotland. Others reserved their views on this until a later stage. For example, the Argyll Renewables Communities felt that options should not be removed at this point, but that further information arising at a later date may indicate that they should. Similarly, the Highland Council suggested options might be removed at the plan review stage based on monitoring of the short term options. Others felt that, more generally, there is insufficient information available at this stage to comment on this.

3.9 Building on the responses to Questions 1, 2 and 3 discussed in the previous section, some consultees, specifically those from the industry but also several individuals and other organisations, said that whilst no options should be removed, the Scottish Government should consider how they are presented. In particular,
industry consultees including Scottish Renewables suggested that regional level recommendations would be more appropriate than site specific options. They were concerned that the SEA may have prejudged the findings of project level EIA and proposed that site specific references should be removed throughout the plan and its assessment. As an alternative to the option based approach, it was suggested that the Plan should focus on the regional level and express capacity for development in terms of MW or GW. It was also suggested by several industry consultees that it is premature to identify medium term development options at this stage, calling instead for further consideration of higher level strategic options.

3.10 With regard to EIA, some consultees noted the limitations of the process, implying the difficulty of relying on this level of assessment to address issues. In particular, Scottish Environment LINK expressed concern about the quality of individual project EIAs, noting evaluation work that highlighted many inadequacies in a sample of projects. They felt it was imperative that EIAs are properly scrutinised, especially in the early stages of the development of the marine renewables industry. It also contended that as five of the ten short term sites had already proceeded to scoping, it was too late for the SEA process to influence these projects.

3.11 Some consultees suggested that key criteria for selection of the options should be established and used to define which areas should be retained or excluded. This included The Scottish Fishermen’s Federation which considered there to be a need for more equitable weighting to be used in defining options. The Federation was also unconvinced that leaving mitigation to the project level would be effective as “by then it will be too late.” This was supported by other consultees representing the fishing sector, who requested that the options be revisited on the basis of enhanced data on fishing activities and significance within the plan area.

3.12 A number of other consultees suggested that all options should be deferred until further information was available, including data and evidence provided in response to Question 2 of the consultation. Many called for more thorough analysis of existing offshore developments before granting additional consents.

3.13 Several respondents suggested that all options with lower wind speeds should be removed. Others were of the view that all options within 8km of the shore should be removed from the plan, as a result of their significant visual effects.

3.14 It was noted that Bell Rock should be removed from the plan given the site constraints arising from radar and the withdrawal of its prospective developer. It was also suggested by some consultees that the plan as a whole would benefit from further consideration of airport and radar installations.

Regional analysis

3.15 The following paragraphs set out views on specific regions referring, where relevant, to the short and medium term option areas within them.
**North Region**

3.16 Only ten of the responses to the consultation focused specifically on the North region, from the following organisations:

Aquatera  
Chamber of Shipping  
Historic Scotland  
Ministry of Defence  
Northern Lighthouse Board  
Orkney Islands Council  
Royal Society for the Protection of Birds  
Scottish Environment Protection Agency  
Shetland Islands Council  
Sportscotland

3.17 The issues raised in this Region are summarised below:

**Support for further development**

3.18 Orkney Islands Council expressed disappointment that development around the islands appeared to have been discounted within the Draft Plan. The importance of the renewables industry to the Islands’ economy was emphasised, including the aspiration to replace the benefits of North Sea Oil with those from greener forms of energy. It was noted that whilst marine energy is advancing in the area, offshore wind is regarded as an important part of the energy mix and should not be excluded. Small scale development across different technologies would together build a critical mass.

3.19 As a result, it was suggested that offshore wind in this location should not be ruled out in the short and medium term. The Plan should acknowledge the importance of the industry to Orkney and be sufficiently flexible to allow scope for limited development of near shore turbines to be considered further as part of the overall vision for renewables.

3.20 This view was further supported by a small number of other consultees, with one asking that communities with a large stake in renewables that appear to have been ruled out of the Draft Plan are not further alienated. Linking questions 4 and 5 of the consultation with this specific region, it was suggested that the SEA to date did not provide sufficient certainty to identify, or indeed to rule out, development areas.

3.21 Shetland Islands Council suggested that the Plan would benefit from further consideration of the Shetland Marine Spatial Plan. This provides further information on the marine environment. It was also recognised that much of the identified development options could be hindered by the limitations of current technology, given the significant water depths. As a result, the Council suggested that wave energy is preferable as water depth is not a constraint but a benefit.
Figure 6: Mapping of Views on North Region

Commercial shipping
Recreational boating
Technical issues
Ferries

Navigation

Ministry of Defence
Fishing

Breeding
Wintering
SPAs / Seabirds
Migratory

Birds
Fish

Filling data gaps
Noise, vibration
Safety

Surf beaches
Kayaking

Recreation

Environmental issues

Further opportunities for development

Orkney

Shetland

Links with wave and tidal
Questioning of options
Grid connections, export and local energy

Consultation and governance

Technical issues

NORTH
3.22 Detailed comments on the environmental assessment were also provided by Shetland Islands Council.

- It suggested that the 250m buffer zones around developments for marine mammals was too limited.
- It was noted that two of the options are in areas identified as having wave energy potential. A question was therefore raised about whether ‘zoning for wind’ would preclude other developments, and it was suggested that the exclusivity process makes this unworkable.
- As in other areas, Shetland Islands Council asked for further consideration of landward infrastructure to be undertaken to allow the full extent of development impacts to be understood.
- The Council asked whether any Government support would be available for the marine renewable sector to undertake necessary environmental surveys to the required level for EIA.
- Further work on fishing was requested, including possibility of permanent loss of fishing grounds and the need for further evidence on benefits such as the creation of artificial reefs.
- Consideration of the overall carbon footprint and payback, given that the marine environment is a carbon sink and part of the carbon cycle.
- The need to include horse mussel beds in table 5.4 of the Environmental Report, given their UKBAP priority habitat status.

3.23 Shetland Islands Council also noted that cultural heritage on the islands could be impacted by development. Further detail on this was provided by Historic Scotland which noted that project level assessment will be needed to focus on:

- The impact of area N1 on Sule Skerry Lighthouse and the Heart of Neolithic Orkney World Heritage Site;
- The impact of area N2 on the wider setting of the World Heritage Site and a number of other sites including the setting of castles, fortifications and churches of the north coast of the mainland;
- Impacts of N4, N5, N6, N7 and N8 on the particular sensitivities of the Shetland coastline including numerous scheduled sites. Recognition of the impact of the sites on two designated wrecks was welcomed.

Consultation and governance

3.24 The Council commented on the consultation process and suggested that the consultation events in the region would have been more beneficial if they had taken place earlier in the consultation period. This was broadly supported by a small number of other consultees who questioned the effectiveness of the consultation and suggested it had a central focus. A public workshop was held in Lerwick on 11 August 2010, as part of the consultation process. Queries were raised about the purpose of the consultation and what the Scottish Government was seeking to achieve from it. It was felt that more specific proposals (location, technology, size, etc.) were needed before substantive comment can be made. It was also felt that a 2 year review of the SEA and the Plan might lead to consultation fatigue.
3.25 Governance issues were also raised and discussed at the Lerwick workshop. Clarification was sought on the roles of the Scottish Government, the Crown Estate, local government and developers and questions were raised about the relationships between development and authorities in Scottish Territorial Waters and UK Waters. There was some discussion about the detail of licences required to develop sites, roles of the Scottish Government and local government. The need to ensure terrestrial and marine plans are linked was also emphasised.

3.26 Workshop participants asked whether developers will sell all the power generated by developments to the grid or if some would be available for purchase by islanders. There was discussion on the proposed interconnector from Shetland to mainland Scotland in the Lerwick public workshop. This included questions on funding, timing and the route of potential connections, and scope for linking into a new European grid.

3.27 Questions were raised in the workshop about the assumptions that have been made in the SEA about the type of technology to be deployed. It was noted that Shetland's seas will require different turbine infrastructure due to wave heights, wind strength and very deep waters. There was some criticism of MaRS, focusing on its reliance on appropriate information. As in other regions, in Lerwick it was suggested that the Plan would benefit from being informed by overseas experience and research.

Environmental issues

3.28 With regard to visual impact, at the Lerwick event it was suggested computer simulations may be the best way to inform the public about potential visual impact. It was felt that the visual impact of offshore wind is significantly less than onshore developments, and that offshore proposals could avoid adverse effects on specific valued onshore habitats. However, there was also an overall feeling that marine renewables would be preferable to offshore wind in the area. People also expressed concerns about noise, vibration and safety of offshore wind turbines.

3.29 The RSPB raised concerns about potential impact on resident or breeding birds in the area, noting that this should be addressed in the finalised plan. Concern was specifically noted in relation to areas N1 and N3, given their potential impacts on the high numbers of seabirds nesting on Sule Skerry and Sule Stack SPA, and as a result there was surprise about the relative low weighting of predicted impacts in this area. Similarly, it was noted that the finalised plan should consider impacts of N4 and N5 on seabirds on the Isle of Foula SPA. More generally, the RSPB was concerned about Shetland being surrounded by offshore wind development, given its potential to impact on breeding, wintering and migrant seabirds, waders, water birds and passerines. Key challenges for the SPAs in the area were raised, requiring further consideration within the Plan’s Habitats Regulations Appraisal (HRA).

3.30 It was noted at the Lerwick workshop that fish displacement should be covered in the SEA. Questions were asked about what biodiversity studies are taking place or are planned to fill current data gaps, and how gaps can be identified and filled.
Technical issues

3.31 Navigation emerged as a key issue in this area from the full range of respondents. Specifically, the Chamber of Shipping and Northern Lighthouse Board welcomed the removal of N2 and N3 on the basis of the potential impact on vessels using the Pentland Firth and Fair Isle Channels. However, the Chamber of Shipping suggested that other shipping routes in close proximity to development should be considered further. The Northern Lighthouse Board felt that the importance of Lerwick was understated within the Draft Plan (section 3.4.6) and that reference should also be made to Sullom Voe. The logistics for shipping in this area was also noted as an issue in the workshop held in Peterhead.

3.32 The high level of recreational sailing activity in the area was highlighted by Shetland Islands Council, including boats sailing to Norway and Holland and annual racing. It was proposed that reliance on mapped areas was insufficient to demonstrate the impacts on these types of activity.

3.33 A number of other environmental and technical issues were raised by sector representatives.

- SEPA noted that, depending on the scale and footprint of projects, development in area N1 could downgrade the water body’s Water Framework Directive Status. As a result, its development would need to be justified on the base of a lack of other alternatives.
- The MoD noted that the MoD air defence radar at Saxa Vord has not been considered and may be a constraining factor particularly for sites in the vicinity of the Shetland Islands.
- Sportscotland raised concerns about the impact of N2 on surf beaches on the North Coast.
- The Scottish Canoe Association noted that kayaking could be particularly affected by development of the sites near Foula, and asked for further opportunities to comment at a later stage.

North East Region

3.34 Eight responses focused specifically on regional issues in the North East, including from the following organisations:

Chamber of Shipping
Highlands and Islands Airports Ltd.
Ministry of Defence
Moray Firth Inshore Fisheries Group
Moray Firth Partnership
Royal Society for the Protection of Birds
Scottish and Southern Energy Renewables
Scottish Natural Heritage

3.35 The issues raised in this Region are summarised over the page:
Figure 7: Mapping of Views on North East Region

- Technical issues
  - Further consultation required
  - Loss of fishing grounds
  - Fishing
  - Fish stocks
  - Cables
  - Exclusions

- Environmental issues
  - Good environment status
  - Fowlsheugh SPA
  - Moray Firth SAC

- Socio-economic issues
  - Implication of impacts on fishing
  - Tourism
  - Economic value of environmental assets

- NORTHEAST
  - Short term option: Beatrice
  - Wick Airport
  - Round 3 Site
  - Incomplete fishing data

Analysis of Consultation Responses
Technical issues

3.36 A public workshop was held in Peterhead on 12 August 2010, as part of the consultation process. Key issues raised in the workshop primarily related to fishing. Whilst stakeholders with industry interests such as Peterhead port were generally supportive of development in the region, they were also aware that it will involve trade-offs. This could include loss of fishing grounds, impacts on fish stocks, exclusions or disruption during construction or installation of cabling. Moving development further offshore would not overcome these issues, given the current distribution of fishing activity.

3.37 It was noted at the workshop that laying cables on the seabed may benefit developers financially, but would increase impacts on fishermen. Participants suggested that the Scottish Government consult cable companies further, who could share further information on this matter.

3.38 Participants in the workshop event felt that large quantities of turbines could have significant effects on the region’s fishing industry and therefore also impact on food security and employment. It was suggested that more detailed information is required, particularly on smaller vessels, as many of the options within the draft Plan coincide with heavily fished areas. The need for further consultation with the fishing industry was emphasised, to provide a clearer picture of the current baseline. It was suggested that the Plan as a whole should recognise the importance of different activities in different regions, with impacts on fishing communities in the North East being given particular recognition. As in Lerwick, grid connections were also raised, in particular the opportunities for offshore grid connections with Norway.

3.39 Reinforcing this emphasis on fishing issues in the North East region, in an individual response the Moray Firth Inshore Fisheries Group raised numerous concerns about the plan as a whole. They emphasised the importance of fishing interests being fully consulted, and suggested that the Draft Plan only considers the needs of the wind energy development sector as it stands. Concerns noted included the lack of a number of key elements including consideration of other technologies and areas, cumulative effects, cabling, test sites, onshore links and infrastructure.

3.40 The Group noted that there should be no presumption that fishing will be excluded from wind farms or cable runs, noting general restrictions during construction and operations. The safety of fishing vessels must be the overriding consideration, and there are options such as using fewer, larger turbines with greater spacing between them to allow access. The Group therefore called for a presumption in favour of continued access and navigation corridors to help fishing industry in transit between ports and fishing grounds. Concern was raised about the potential fuel cost of diversion and the time implications given restrictions on numbers of days at sea. The need for larger scale mapping to accurately assess the importance of options for fish stocks was also raised.

3.41 The Chamber of Shipping supported this, noting that there is a need for careful consideration of development in relation to shipping and fishing in the Moray Firth to avoid conflict between them. Recognition of ports was welcomed.
3.42 The MoD raised a number of specific issues requiring further consideration:

- Although the location of Kinloss and Lossiemouth bases has been identified in the plan, the presence of air traffic control radars has not. This may therefore be a constraining factor to development.
- RAF Buchan has been identified in the SEA, but the nearby Hill of Dudwick Meteorological Weather Radar has not. This may be a constraining factor.
- Siting and design of development in NE1 will need to be considered in relation to the use of nearby RAF Tain Air Weapon Range to ensure military aviation is not obstructed or inhibited.
- NE1 and NE2 are in proximity to MOD Danger areas used for aircraft operations. This will need to be taken into account in siting and design.

Environmental issues

3.43 The Fisheries Group stated that there is a need to view the Plan within its wider context including the MSFD and development impact on good environmental status for marine waters by 2020. This was considered to be particularly relevant to changes to benthic ecosystem and commercial fish and shellfish species due to energy inputs from wind farm operations. It was also proposed that the SEA explores more on sediment disturbance and links with toxic algal blooms, with consequences for commercial fishing operations.

3.44 The RSPB questioned some of the conclusions of the assessment in relation to Natura impacts and noted the proximity of area NE3 to Fowlsheugh SPA, and NE1 to the Moray Firth SAC. Further information on cumulative effects and medium term options was also requested.

Socio-economic issues

3.45 The need to consider the socio-economic (as well as environmental) impact of development in the medium term areas on important fishing areas was raised.

3.46 The Moray Firth Partnership commented on the overall approach to the SEA and Draft Plan. They raised the need for more economic information to be built in, such as the role of the Moray Firth Dolphins in generating tourism income. Broader points on the need to reconcile environmental impacts against clearer targets for renewable generation were also made.

Short Term Options - Beatrice

3.47 Amplifying some of these issues raised by other stakeholders at the regional level, Scottish and Southern Energy Renewables (SSER) noted that the detail included in the SEA on spawning and nursery grounds is incomplete, and suggested that the scoping report for the project should be referred to as a more accurate source of information.

3.48 Highlands and Islands Airports Limited (HIAL) recorded an interim objection to this option, as a result of its potential impact on Instrument Approach Procedures to Runway 31 at Wick Airport. It was also noted, however, that this impact could be
avoided by repositioning the development further south west, and that HIAL are in discussion with SSE on the matter.

**East Region**

3.49 16 responses focused on the proposals for the East Region, including from the following organisations:

- Chamber of Shipping
- Civil Aviation Authority
- Fife Council
- Forth and Tay Wind Developers Group
- Fred Olsen Renewables
- Historic Scotland
- Ministry of Defence
- National Trust for Scotland
- Neart na Goaithne Offshore Windfarm Ltd
- North Berwick Environmental Trust
- Northern Lighthouse Board
- Royal Society for the Protection of Birds
- Scottish Borders Council
- Scottish Environment Protection Agency
- Seagreen
- Sportscotland

3.50 The issues raised in this Region are summarised over the page:
Figure 8: Mapping of Views on East Region

- **Medium term sites**
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Access corridor required
  - Ports
  - Strategic defence access
  - Navigation

- **Short term sites**
  - Short term option: Neart na Gaoithe
  - Short term option: Inch Cape
  - Less seascape effects
  - Radar issues
  - Water
  - Impact on recreation

- **Environmental issues**
  - Concern about mitigation
  - Communities (construction impacts)
  - Visual and seascape effects

- **Technical issues**
  - SEA/EIA overlap
  - Regional perspective required
  - Other strategic options

- **EAST**
  - Short term sites
  - Cumulative assessment required (Round 3)
  - Ports
  - Strategic defence access
  - Access corridor required
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Cultural heritage
  - Bell Rock
  - St. Abbs Head
  - Accurate of SEA findings on shipping and fish
  - Shipping sector concerns
  - Navigation

- **Analysis of Consultation Responses**

- **E1**
  - Forth Array

- **Short term option:**
  - Neart na Gaoithe
  - Inch Cape
  - Bell Rock
  - St. Abbs Head

- **Medium term sites**
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Access corridor required
  - Ports
  - Strategic defence access
  - Navigation

- **Environmental issues**
  - Concern about mitigation
  - Communities (construction impacts)
  - Visual and seascape effects

- **Technical issues**
  - SEA/EIA overlap
  - Regional perspective required
  - Other strategic options

- **EAST**
  - Short term sites
  - Cumulative assessment required (Round 3)
  - Ports
  - Strategic defence access
  - Access corridor required
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Cultural heritage
  - Bell Rock
  - St. Abbs Head
  - Accurate of SEA findings on shipping and fish
  - Shipping sector concerns
  - Navigation

- **Analysis of Consultation Responses**

- **E1**
  - Forth Array

- **Short term option:**
  - Neart na Gaoithe
  - Inch Cape
  - Bell Rock
  - St. Abbs Head

- **Medium term sites**
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Access corridor required
  - Ports
  - Strategic defence access
  - Navigation

- **Environmental issues**
  - Concern about mitigation
  - Communities (construction impacts)
  - Visual and seascape effects

- **Technical issues**
  - SEA/EIA overlap
  - Regional perspective required
  - Other strategic options

- **EAST**
  - Short term sites
  - Cumulative assessment required (Round 3)
  - Ports
  - Strategic defence access
  - Access corridor required
  - Berwickshire Coast AGLV
  - Visual impacts
  - Biodiversity - designated sites
  - Cultural heritage
  - Bell Rock
  - St. Abbs Head
  - Accurate of SEA findings on shipping and fish
  - Shipping sector concerns
  - Navigation
Level of detail

3.51 The Forth and Tay Wind Developers Group provided a detailed response that brought together various issues in the region. Overall, they were supportive of the commitment to the SEA, Habitats Regulations Appraisal (HRA) and Plan and appreciated the time committed to achieving the outputs to date. They were content that the Draft Plan could form the basis for emerging development of the sector, in the short term.

3.52 However, the Developers Group also provided comments on how the SEA could be strengthened. This primarily included clarification of the boundary between the SEA and issues which are more easily and properly tackled at the project level through EIA. Concern was noted that the SEA may be prejudging EIA level considerations and suggesting mitigation that is not appropriate. This included particular anxiety about the removal of options from the Draft Plan on the basis of the HRA findings.

3.53 As with other developers, it was proposed that the site specific approach was replaced with regional assessment to provide a high level perspective and focus on significant effects from a national perspective. Further consideration of more strategic level options was recommended and it was also suggested that the SEA categories were revisited to achieve a closer fit with those used in EIA. Individual developers, including Seagreen, reinforced this view. A further developer requested that the demonstration project at Musselburgh Bay should be included in the plan as a short term option.

Environmental Issues

3.54 The RSPB welcomed the consideration of impacts on migratory birds in this region, noting significant movements taking place across the area and seeking additional reference to passage of birds across the North Sea from Scandinavia and further afield. The RSPB stated that the finalised plan should ensure impacts on birds are minimised, including in relation to barnacle, bean and light-bellied brent geese, ducks, waders and passerines, many of which being of relevance to Natura sites in and outwith Scotland. It was also stated that the final plan should note potential for adverse effects on prey species, arising from any impacts on spawning grounds and nursery areas for fish species.

3.55 North Berwick Environmental Trust raised concerns about visual and seascape impacts, and the potential effects arising from large scale construction on communities in the area.

3.56 A detailed response was provided by a surf business in Dunbar, seeking clarification of the likely impacts on this activity, and therefore associated businesses. Concern was raised about the scale of development proposed and its potential impact on the swell size. This was known to be more limited than that from the Atlantic serving comparable surfing areas in the west of Scotland, suggesting relative sensitivity in this region. It was noted that in other areas (Cornwall) the surfing community have been consulted before progressing with marine renewables projects.
Technical issues

3.57 Shipping emerged as a key issue in this region. The Chamber of Shipping expressed disappointment that the short term options sit alongside the Round 3 Zone and noted that cumulative impacts on shipping in this area would be significant as a result of rerouting requirements and associated time and financial costs to businesses. This was considered likely to have a long term impact on the viability of trade and employment, with specific impacts for Forth Ports, and risks to growth more generally. Access to the Firth of Forth was also raised in the Peterhead public workshop.

3.58 The Civil Aviation Authority questioned how radar issues have been avoided in this region, given the military and civil radars that exist here.

3.59 To support the consultation process, public workshop events were held in Edinburgh and Dundee. Attendance at the Dundee event was limited to just two, but the discussion nevertheless highlighted some interesting issues. Issues around onshore elements of the developments and the planning process were raised. People also asked how information gaps would be filled. The Statoil demonstration project off Peterhead was raised.

Short Term Options - Bell Rock

3.60 Several consultees noted that Bell Rock is no longer being pursued as an option as a result of insurmountable radar driven constraints. Notwithstanding this, SEPA noted that development at Bell Rock had the potential to downgrade the area’s Water Framework Directive status, depending on its scale and footprint.

Short Term Options - Inch Cape

3.61 The Chamber of Shipping proposed that this site, along with Neart na Gaoithe, be reconsidered as a result of its potential implications, individually and cumulatively, for navigation.

3.62 Seaenergy Renewables questioned why the assessment had concluded that development in this area would have a moderate impact on seascapes, given that it lies more than 13km from the coast. Presentation of the findings for the site in the Environmental Report appendices was also queried.

Short Term Options - Neart na Gaoithe

3.63 The prospective developer (Neart na Gaoithe Offshore Windfarm Ltd.) provided a response to the plan as a whole which echoed many of the overarching issues raised by other developers. To support the general consensus amongst industry representatives that the plan should not be site specific, it was noted that the estimated generating capacity of this site has changed. They suggested that this region would be more appropriately referred to as ‘Forth and Tay’ with site specific references being removed to ensure future proofing. Suggestions were also made by the developer about how presentation of information could be improved.
3.64 The developer noted that the SEA assessment findings varied from those being undertaken at the site level. This included information on shipping and doubts about the accuracy of the conclusions in relation to fish stocks, given the lack of certainty about the site layout at this stage. However, the Chamber of Shipping proposed that this site, along with Inch Cape, be reconsidered as a result of its potential implications, individually and cumulatively, for navigation.

**Short Term Options - Forth Array**

3.65 Scottish Borders Council noted that it has responded to a request for a scoping opinion for this site, and that no major objections were raised, given that it lies some 17km from the shore. The need to assess the cumulative effect of this development with the medium term option, E1, was noted.

3.66 Sportscotland raised concerns about the impact of this development on beaches and surfing, whilst noting its significant distance from shore.

3.67 The developer, Fred Olsen Renewables, explained the collaboration that is underway in the region to assess cumulative impacts. Similar broader concerns to those of other developers were raised on the Plan more generally, including its overly detailed approach, the potential implications of the HRA and potential for the process to generate delays and uncertainty. Further information on how data gaps will be filled was sought, but it was felt that the SEA had identified sufficient baseline information to inform the development of a strategic level plan.

**Medium Term Options**

3.68 Specific concerns were also raised by developers about the medium term option (E1) and the need to assess cumulative impacts with the Round 3 Firth of Forth zone.

3.69 Similarly, the Northern Lighthouse Board noted option E1 with concern, given the likelihood of significant cumulative impacts and safety issues when this was viewed in relation to onshore developments and the Round 3 zone. It suggested that there is limited scope for further development in this area. Clarification was also provided on the importance of ports on the Forth.

3.70 Further technical constraints were raised by the MoD, which noted that option E1 includes Navy Exercise areas which may be relevant factor in siting and design of wind farms in this zone. The MoD also advised that, in conjunction with short term areas this option will block key maritime and strategic defence navigational access to the Firth of Forth. Accordingly, it was suggested that an east-west corridor for maritime navigation will need to be retained through this zone should development progress.

3.71 Fife Council’s response suggested that it was content with overall scale and pace of change proposed in the plan, and the assessment conclusions.

3.72 Scottish Borders Council stated that they had expressed no major objections in relation to the Forth Array given its distance from shore, but expressed concern
about area E1. This was a result of its proximity to the sensitive Berwickshire Coast AGLV (apparently 6km from shore). At this point, the full extent of this concern could not be defined by the Council, given the uncertainties about the scale of development or turbines, but it was noted that further more detailed consultation will be required at the appropriate stage. Scottish Borders Council noted more generally that although there is general support for renewables, within the area there is growing concern about the number of proposals and as a result the medium term options is likely to generate significant concerns. It was also noted that the cumulative impact of area E1 and the Forth Array should be assessed.

3.731 The Institute for Ecology and Environmental Managers (IEEM) recommended that the medium term option (E1) be removed from the plan. This is in an area with a large number of sensitive coastal sites, and impacts would arise individually and cumulatively with the four short term options, which could affect the integrity of designated sites with high conservation value.

3.74 Historic Scotland noted the potential for the development in this region to impact on the setting of Bell Rock, and referred to the large number of sensitive coastal sites in this region which could be impacted by sites individually and cumulatively with the other options including E1. As a result, they agreed that project level assessment will be required to consider these impacts further and identify mitigation where appropriate.

3.75 The National Trust noted that the scenic value of St. Abbs Head is important for visitors and the local economy, and questioned whether the Forth Array will be close enough to the shore to be visible. Impacts on seabirds was also raised as a concern, particularly in light of recent decreases in the population, and impacts on other species including grey seals, migrant birds, cetaceans and elasmobranchs (sharks, rays and skate).

**South West Region**

3.76 Just under half of all the responses to the consultation (47%) were made up of clear objections to the Wigtown Bay and Solway Firth scheme. Overall, 200 individual responses specifically indicating opposition to Wigtown Bay were received and this is supplemented with an ongoing petition with more than 800 signatures at the time of writing. 205 responses reflect opposition to Solway Firth (Robin Rigg Extension) and 77 further responses consider development in the South West more generally, often incorporating views on the specific short term options.

3.77 Most of the responses came from individuals. In addition, the following organisations and businesses provided comments specifically relating to this region:

- Annandale and Eskdale Area Committee (Dumfries and Galloway Council)
- Association of Wigtown Booksellers
- Chamber of Shipping
- Colvend and Southwick Community Council
- Cree Valley Community Council
- Discover Scotland
Douglas Hall Fisheries  
Drummore Bowling Club  
Dumfries and Galloway Council  
E.ON  
Galloway and Upper Nithsdale Liberal Democrats Constituency Party  
Galloway Fisheries Trust  
Galloway Static Gear Fisherman's Association  
Garlieston Community Council  
Gatehouse of Fleet Community Council  
Gillespie Leisure Limited  
Historic Scotland  
Isle of Whithorn Community Council  
Keep Wigtown Bay Natural  
Kirkmaiden Community Council  
Manx Fish Producers  
Maritime and Coastguard Agency  
Ministry of Defence  
Monreith and District Action Group  
National Federation of Fishermen's Organisations  
Newton Stewart Sub-Aqua Club  
Ochtrelure and Belmont Community Council  
Portpatrick Community Council  
Royal Society for the Protection of Birds  
Rusko Holidays  
Scottish Natural Heritage  
Solway Coast AONB  
Solway Firth Offshore Wind Developer Group  
Solway Firth Partnership  
South Rhins Community Development Trust  
Stewartry Area Committee (Dumfries and Galloway Council)  
The Kipp Estate  
The National Trust for Scotland  
The Whithorn Trust  
West of Scotland Seafish Training Association Ltd  
Wigtown and District Community Council  
Wigtown Bay Local Nature Reserve Advisory Management Committee  
Wigtown Bay Wildfowlers Club

3.78 Public workshop events were held in Dumfries and Wigtown on 6 August 2010, as part of the consultation process. Officials also attended the Stewartry Area Committee meeting in September 2010.

3.79 The diagram on the next page summarises key issues raised in the South West Region.
Figure 9: Mapping of Views on South West Region

- Insufficient time
- Insufficient local publicity
- Dissatisfaction with events
- Need to listen to local people
- Decisions already made?
- Full reassessment required
- Potential for loss of ‘essential qualities’
- Disproportionately large contribution to targets
- Combination of on- and offshore developments
- Undersell location economy
- Scale of development in the region
- Scenic quality
- Tranquility
- Easy to overlook?
- In-migration threatened
- Local services and facilities
- Health
- Gaps in information
- Biodiversity
- Landscapes and seascapes
- Visual, landscape, seascapes impacts
- Cultural heritage
- Energy policy
- Efficiency of Robin Rigg
- Benefits leave Scotland
- Grid connections
- Preferences for wave and tidal
- Question viability of wind
- Technical issues
- Ministry of Defence
- Munitions
- Radioactive contamination of the seabed
- Tourism impacts
- Employment
- Little benefit based on Robin Rigg
- Economy
- Consultation process
- SOUTH WEST
- Fishing
- Key routes
- Recreational boating
- Lack of engagement
- Insufficient data
- Impacts on fish stocks
- Displacement/exclusion
- Cross border issues
- Migratory fish routes
- Navigation
- Analysis of Consultation Responses
3.80 Many of those who commented on the specific short term schemes in this region also made broader comments. Others focused on a regional perspective or commented only on the medium term options.

Views on the Consultation Process

3.81 At the outset of the Dumfries consultation event, people expressed concerns about the consultation period and the deadline for responses, and there was a strong feeling that the development of the Plan was being hurried as a result of its underlying political impetus. These concerns were also raised in Wigtown, with the 150-200 people who attended the event voting for a 16 week extension to the consultation period. Whilst this could not be granted, a 6 week extension was subsequently notified by way of a compromise.

3.82 At the Wigtown event, there were additional concerns about the timing of the consultation during the summer. It was suggested that the Scottish Government should have consulted on the options when the Crown Estate announced exclusivity agreement for the 10 short term sites. There was significant concern that local issues were not being raised as consultation appeared to be mainly focused on regional and national representatives. People felt that the Scottish Government needed to liaise with councils, community councils and local people to get to local issues. People were concerned that Ministers would pay more attention to organised bodies, and it was suggested that they should visit the local area to see the potential impacts.

3.83 Within the formal written responses, general views similarly focused on the planning process as well as its content, with several consultees raising concerns about the consultation period and suggesting that it was a prior assumption that the 10 sites would proceed, regardless of consultee views.

3.82 The Solway Firth Partnership suggested that stakeholders in England had not been consulted and complained that the local consultation was undertaken too late in the process, and did not adequately answer local people’s questions. They also complained about lack of hard copy information or accessible maps.

3.83 Some consultees, however, considered the SEA to have been robust, and a useful starting point for regional planning.

Scale of development within the South West

3.84 For the region as a whole, there was consensus that the overall scale of development was unacceptable when considered in relation to the area’s special characteristics and its associated capacity to absorb change in a sustainable way. This was particularly the case when on and offshore wind energy developments were considered together. There were many views that the scale of development overall would undermine some of the essential qualities of the Solway coast, including its wild and isolated character. Visual and seascape impacts were the most significant concern, forming a key theme within the local consultation workshops and an issue shared by the vast majority of individual respondents.
3.85 Dumfries and Galloway Council made a broad, but also detailed response to the consultation. This noted that the area has already made a substantial contribution to renewable energy targets, and that there is a need to recognise the cumulative effects from both on and offshore development collectively. This view was strongly supported by people attending the local consultation workshops. At the Dumfries workshop, for example, people called for a much fuller assessment of cumulative effects of on and offshore developments and the need to ensure a process is in place to tackle these combined effects. The most significant concern of Dumfries and Galloway Council related to the impact this would have on the economy, particularly tourism. This response was fully endorsed by the Council’s area committees.

3.86 Many consultees made close links between the area’s environmental quality and its current and future opportunities for economic development, employment and regeneration. For example, the Solway Firth Partnership noted that a biosphere reserve in the area and possibilities around national park status could be significantly undermined by development of the proposed scale. Initiatives for wildlife tourism such as local RSPB reserves were mentioned by several consultees for the same reason.

Impacts on communities

3.87 Impacts on communities was a strong theme within the public consultation workshops in the area, with concerns about negative impacts not being compensated with any local economic benefits. People felt disengaged from the process, and were concerned that the low numbers of people living in the area made them easy to overlook. People were also very concerned about impacts on the wellbeing of local communities, including from noise, loss of tourism jobs and income, and energy costs. There was a strong feeling that the Scottish Government needs to consider people as much as the environment. Potential impacts on people’s health were raised as well as more specific impacts including noise, and it was felt that the Government had a duty of care to communities.

Environmental issues

3.88 The Solway Firth Partnership felt that the assessment of impacts in the region had numerous knowledge gaps, particularly in relation to impacts on key species including birds, sharks, skates, rays and commercial fish species. They contended that there has been inadequate consideration of effects on European Protected Species, cetaceans, otters, turtles which all occur in the area. There were calls for closer links with marine planning and scepticism about the process amongst local people, as all 10 sites were incorporated into the Draft Plan. The Solway Firth Partnership was concerned that the Final Plan will be automatically transposed into regional marine plans, and stated that it must remain a draft until considered part of marine spatial planning process.

3.89 Wigtown and District Community Council was opposed to the Plan as a whole, as a result of the ‘excessive’ level of development and concerns that offshore wind arrays would effectively cordon off the south coast from North West England, the Isle of Man and Ireland. Impacts on the coast, navigation, fishing (particularly
angling and salmon migration and impacts on fish in the Cree and the Bladnoch) and recreational boating were all raised as concerns. Low flying activities were also noted. Similarly, there were concerns about effects on biodiversity, including key species and habitats and local nature reserves.

3.90 Industry representatives with interests in this area were generally supportive of the Draft Plan. Developers agreed that whilst impacts were inevitable, mitigation could be provided to reduce this to an acceptable level. Pointers on the HRA were provided, including the need to cover disturbance of marine mammals, seal breeding colonies, foraging seabirds and their habitats, barriers and disturbance on migrating mammals fish and seabirds, and spawning and nursery grounds of Biodiversity Action Plan (BAP) fish species. As with other regions, it was stressed by the industry respondents that plan level assessment should not prejudge EIA level assessment. It was also noted that collaborative working on cumulative effects is a requirement of The Crown Estate.

3.91 In addition to general concerns on visual and landscape effects from all of the sites and in particular the two short term sites within the region, further views were raised by some specific interests. This included the National Trust for Scotland which noted that further development in the Rockcliffe area could degrade an outstanding seascape, and that a number of other properties have outstanding coastal aspects which could be affected by the development. The Solway Coast AONB noted the potential for significant effects, looking into and out of the AONB and stated this would be exacerbated by additional effects from onshore developments. The Solway Firth Partnership questioned why the short term options had been included in the plan despite their potential for negative impacts on NSAs. They contended that insufficient attention has been paid to impacts on the AONB, views from the Lake District National Park, and the setting of the Hadrian’s Wall AONB.

3.92 The RSPB provided detailed comments relating to the area as a whole. It noted the need for mitigation of potentially significant effects identified in the SEA. Concern was raised that impacts on birds from sites SW2 and SW6 had been ruled out as a result of their distance from designated sites. Instead it was noted that the Solway and Wigtown Bay are major flyways with internationally important numbers of birds passing through. It was noted at the Dumfries public consultation workshop that it is crucial to carry out migratory bird surveys at the right time of year, and that wind turbines are known to be dangerous to birds.

Economy

3.93 Tourism, linking with visual impacts, was also raised by the community council particularly in relation to the Wigtown Bay development and it was emphasised that the area is reliant on the tourism sector. Specific issues were raised about the potential for proposals to impact on Kirkmabreck Quay – an essential facility for sustainable timber transport and export. With regard to the community, the community council explained the importance of retired people moving to the area for maintaining services, and the social fabric of the region. There was concern that impacts on the scenic quality of the area could affect this adversely, and undermine fragile housing markets.
3.94 A detailed response focusing on wildfowling in the region as a whole was received. This highlighted important areas and potential impacts on this activity and associated tourism.

3.95 Several people remarked about the profits from the development ‘going to Denmark’ or were concerned that the impacts would be on Scotland, but that the energy would feed into the national grid and supply English homes. Many individuals stressed they had no issues with offshore wind in principle, but believed the siting of the short term developments was misconceived. Energy efficiency was raised as a preferable response to the climate change agenda.

3.96 Most of the respondents expected that economic benefits of the development to the Dumfries and Galloway area would be very limited. Partly, this appears to be based on views that the benefits of Robin Rigg have only been realised in Cumbria. The Galloway and Upper Nithsdale Liberal Democrats Constituency Party supported this view and noted that the potential loss of tourism employment and income would not be offset by any compensatory gain from the development. Many people anticipated with regret that construction, turbine making and maintenance would use labour sourced from elsewhere.

Other Technical Issues

3.97 Several consultees raised concerns about busy shipping routes in this area and the potential safety implications of development. It was suggested that AIS data has led to a significant underestimation of activity in the area. Specific issues were raised in relation to the short and medium term options, as described in more detail below. This included concerns about impacts of option SW1 on the Belfast and Larne to Loch Ryan Ferry Crossing.

3.98 Grid connection issues were also raised at the local events. For example, at the Wigtown workshop, the public noted the disincentive arising from the national grid feed-in tariff and there was concern that there was insufficient capacity to service the proposed developments. People were also worried about secondary effects arising from pylons, given the cost of underground cabling. It was felt that the plan should have considered this and other infrastructure issues in more detail.

Fishing

3.99 Key responses relating to fishing in the region were received from:

- Scottish Sea Angling Conservation Network
- Galloway Static Gear Fishermans Association
- Manx Fish Producers
- Galloway Fisheries Trust
- Urr District Salmon Fisheries Board
- River Eden and District Fisheries Association
- Solway Firth Partnership

3.100 Concern was expressed by interests in this sector about a lack of earlier involvement in the plan and the need for further research was stressed. There were
mixed views on the assessment, but on the whole this group were unconvinced that the approach had covered their interests to a sufficient degree of detail and accuracy. Some felt that this was a more significant issue for this region than others within the Plan. The broad effect of removing fishing grounds in terms of displacement and more intensive fishing in the remaining areas was raised. Specific views on short and medium term sites were also raised, as described in more detail below. On a more positive note there were offers of assistance with future assessment, information gathering and monitoring and willingness to be involved in the process as it moves forward. Detailed supplementary information was provided by several of the fishing sector consultees, which will be taken into account as the plan is finalised.

3.101 These industry views were supported by those attending the Dumfries public workshop. In particular, there was concern that the Plan and the SEA had identified only limited effects on fishing from development in the region. It was reported that there is a lot of activity originating from Maryport, and noted that many of these vessels would be smaller than 10m and therefore excluded from the broad analysis. It was noted with concern that the Wigtown Bay site was located in the middle of vessel routes, with any development requiring navigational assessment. People also asked whether liaison was being undertaken with the fishing industry, and it was noted that further information is available to better inform the plan.

3.102 Key considerations included impacts on migratory fish routes, nursery grounds, and spawning grounds. Effects during construction and operation were noted. Impacts on salmon and sea trout and their passage to and from rivers were raised as key concerns. Some consultees were particularly concerned that a valuable cockle fishery and shellfish aquaculture were not taken into account. The sector strongly recommended further research on issues including the impact of high voltage cabling on salmon and sea trout and migratory fish generally.

3.103 Fishing sector consultees in this region wish to see more scientific evidence that noise and vibration from installation and operation of wind farms will not deter migrating salmon, lamprey and eels from migrating through the Solway. Until such evidence is produced, at least one of the consultees will maintain a strong objection to proposals. Some recognition was, however, given to further assessments including EIA and HRA and the extent to which these would address some of the issues raised. It was suggested that there is a need for more robust research before development (and possibly the plan) proceed, and it was noted that this is moving forward in collaboration with developers of the short term times. It was also suggested that an amended SEA should be published.

3.104 Fishing was noted to be a major economic driver for the region as a whole. The Solway Firth Partnership emphasised the importance of small vessels and static fishing gear and the need for consultation with fishing interests in the Isle of Man and Cumbria.

Broader energy policy

3.105 Many people commenting on development in this region, including the short term options, raised broader questions about energy policy and suggested that wave
and tidal would be preferable. Some suggested other alternatives including nuclear energy. Many referred to a potential tidal barrage for the Solway. Broader energy issues, such as subsidies, were also repeatedly raised by consultees in the three local public events.

3.106 At the Dumfries public consultation workshop, there were questions as to whether any marine renewable development (wave and tidal) would be possible in the Solway, and people asked why there are no Saltire Prize areas in the region. People also viewed alternatives such as improved energy efficiency as being more preferable to offshore wind. People did not consider wind farms to be a sustainable option, raised questions about subsidies for the industry, demand for the electricity generated, and the economic viability of projects in an area with low wind speed. There was significant concern that the developer would go for the cheapest and easiest option, which is most likely that closest to shore in shallower water.

3.107 Several consultees questioned the efficiency of Robin Rigg and wind more generally. Many suggested that the Solway as a whole has insufficient wind to sustain an efficient development. Numerous people requested that monitoring data from Robin Rigg be considered before further development proceeds.

Short term options: Wigtown Bay

3.108 The overwhelming majority of all responses to the consultation in this region, together with discussions at the local consultation workshops, reflected strong opposition to the proposed short term option of Wigtown Bay. The majority of those opposing the development were individuals (some 150 formal responses, plus the continuing growing number of petition responses at the time of writing). A large number simply stated that the project should be removed from the plan. A very small number suggested that it could become a medium term project. Only two respondents (except the prospective developer interests in the area) supported the project. The most frequently raised issue was landscapes, seascape and visual effects of the development. The diagram below provides further detail of the issues raised in relation to this specific option area.

3.109 Supportive responses were received from the regional wind developer group, although, as with regional industry groups for other areas, they questioned how far the SEA should go towards defining project level impacts and mitigation. The need for, or appropriateness of, some of the project level mitigation proposals was questioned. It was noted that The Crown Estate requires joint regional working to explore the cumulative effects of developments on a regional basis.

3.110 In terms of organisations, detailed responses were received from Dumfries and Galloway Council (incorporating views from its area committees), the Solway Firth Partnership, several community councils (Isle of Whithorn, Gatehouse of Fleet) and the Keep Wigtown Bay Natural Campaign. Local MSPs raised specific concerns about the development, referring to its scale, proximity to the shore, visual and landscape impacts and its implications for tourism. These organisations and key representatives had little confidence that any mitigation of the scheme’s predicted effects would reduce its impacts significantly. Concerns were also widely raised about impacts on biodiversity, population and health.
Figure 10: Mapping of Views on Wigtown Bay

**Technical Issues**
- Ministry of Defence
- Munitions
- Radioactivity

**Communities**
- Limited engagement
- Impacts on amenity
- Impacts on health
- Noise
- Impacts on Cumbria Fleet
- Impacts on Isle of Man Fleet
- Limited alternatives in the Solway
- Impact on fish stocks
- Safety issues
- Recreational angling
- Issues for salmon and trout rivers
- Insufficient information and engagement

**Fishing**
- Small recreational boats
- Commercial activity
- Access to ports
- Timber transport
- Birds
- Migratory routes
- Cetaceans
- Fish
- Sediment disturbance
- Coastal erosion
- Wave climate
- Cultural heritage

**Navigation**
- Designated areas
- Dark skies status
- Lighting
- Shadow flicker
- Aspect: sunset and sunrise

**Tourism and recreation**
- Residents
- Visitors
- Key views and vistas
- Limited scope for mitigation
- Site much further offshore
- Remove from plan
- Inshore not offshore

**Regional economy**
- With onshore development
- With Robin Rigg and Solway Firth

**Landscape, seascape, visual effects**
- With onshore development
- With Robin Rigg and Solway Firth

**Methodology**
- Cumulative impacts
- Landscape, seascape, visual effects
- Regional economy
- Visual effects
- Wildfowling
- Yachting
- Diving

**Other environmental issues**
- With onshore development
- With Robin Rigg and Solway Firth

**Navigation**
- Designated areas
- Dark skies status
- Lighting
- Shadow flicker
- Aspect: sunset and sunrise
3.111 As with general comments about the approach to the Plan as a whole, and regional views, many consultees raised issues with the length and approach to consultation for the plan. Many wished to have seen more detail on the specific projects in the area. Many felt more time was needed to allow for further assessment and evaluation of the findings and some called for a public local inquiry of the development. Concerns were raised about the advertising of the consultation and its public events. The Galloway and Upper Nithsdale Liberal Democrats Constituency Party felt that the consultation period had been unrealistic to allow for regional consultation effects, and that this reinforced their view that the Plan had undertaken insufficient consideration of regional impacts.

**Landscape, Seascape and Visual Effects**

3.112 Most responses focusing on this site were primarily concerned about visual, landscapes and seascape impacts of the development. Views varied on secondary impacts from this. Many people were concerned with the quality of life of residents, with many others focusing on the potential for secondary impacts on tourism. Most people were unconvinced that mitigation measures would reduce these effects, and most strongly proposed that the option be removed from the plan, rather than suggesting that it could be laid out differently or positioned in a way that its impacts could be reduced.

3.113 The proximity of the proposed development to the coast was a key concern. Indeed, many consultees noted that the plan should be regarded as a plan for inshore, as opposed to offshore, wind energy. At the Wigtown workshop, people felt that locations further offshore would be preferably. The community emphasised that it was not averse to wind energy development as such, but that the proposed short term sites are too close to shore.

3.114 In many cases, the likely effects of the development on views and vistas from the coast were noted, including from the Dumfries and Galloway Coast to Cumbria, the Isle of Man and Northern Ireland. Views across Brighouse Bay were also repeatedly noted as a key concern. SNH stated concern about the inclusion of the site given its proximity to the shore, the likelihood of significant seascape and visual impacts (being greater than as stated in the Environmental Report) and the lack of scope to mitigate these effects given the nature of the proposal.

3.115 Views on landscape and visual effects also related to some nationally designated areas including the Fleet Valley National Scenic Area (NSA). Significantly, SNH noted that it is likely to raise issues about the proximity of the development to the coast and potential impacts on the NSA at scoping for the project. SNH was also unconvinced that mitigation will be effective in this case. Lighting was raised as an issue and it was noted that the project assessment will need to focus on how the Fleet Valley NSA is experienced. Lighting impacts on the dark skies status of the Galloway Forest Park were also raised in the Wigtown consultation event and by some individuals. Other visual issues included effects arising from the movement of the blades at different speeds, which could not be readily mitigated. More detailed visual issues included the likely backlighting of the turbines at sunrise and sunset.
3.116 Several consultees noted that the Environmental Report had recorded the landscape and visual effects as significant, and strongly questioned why this was not considered to be sufficient grounds to warrant removal of the proposal for Wigtown Bay from the draft Plan.

PETITION

Keep Wigtown Bay Natural produced an online petition opposing the Wigtown Bay development and it was published online in August 2010. At the time of writing (10/12/10) 812 people had signed the petition.

Cumulative effects

3.117 Compounding this, cumulative impacts were raised as an issue by many consultees. Many were concerned about the combined effects of offshore development with the larger scale developments and smaller scale installations on land in the vicinity of the coast. Several suggested that the area was at saturation point in term of pressure for small scale wind, and therefore did not welcome the likelihood of the development in addition to these issues.

3.118 Views were also raised about the methodology used for the landscape and visual impact assessment, with several people seeking clarification of detailed points within the SNH guidance.

Tourism and recreation

3.119 Tourism related concerns were very widespread and focused on visual impacts (explored above) and more general visitor perceptions and enjoyment of the area. Some responses were received from local businesses, including those running accommodation. All were concerned about impacts arising as a result of the visual and seascape effects of the development. Reinforcing this, local people noted the critical importance of tourism to the local economy at the Dumfries workshop, and questioned how this would be assessed. There was concern that the significant negative effects of development of the sites in the Solway on tourism had not been recognised within the Draft Plan or its SEA.

3.120 Other recreation issues were raised, with concerns about sailing and watersports and wildfowling, as noted above. Local interests were concerned about any possible restriction of local diving opportunities (Newtown Stewart Sub-Aqua Club) during both construction and operation, and it was suggested that this could be mitigated by siting the development further offshore. Discover Scotland expressed concerns about the project and suggested that are preferable areas where tourism impacts would be much less significant.

Impacts on communities

3.121 The impacts of development on people and communities was raised by individual respondents and also widely debated within the local public consultation workshops. Impacts of concern included lighting, noise, general disturbance and
shadow flicker. There was a broad feeling that whilst the communities would experience the impacts of the development, they had not been fully engaged in the process and expected to receive little, or more often, no economic benefits. Impacts on property values, business viability and house prices were also concerns.

Fishing

3.122 Issues were raised about the impact of this specific development on fishing by several key organisations including: Galloway Static Gear Fisherman’s Association; NFFO and Manx Fish Producers. This clearly demonstrated that fishing interests extend much more widely than the Dumfries and Galloway area, and include those operating from Cumbria and the Isle of Man.

3.123 Key impacts on fishing and fish stocks were expected to include loss of habitats, noise and vibration effects on adjoining areas, cable impacts, and displacement of activity to less suitable or profitable areas. Fishing interests reported that the area is regularly fished for nephrops, skate and plaice by vessels operating from Maryport, providing an important source of income. The area is also regularly fished by the local scallop fleet in winter. The project overlaps with trawling sites and could impact on static line fishing. Hand gathering of cockles, mussels, razorfish and other species were also expected to be affected, together with local and tourist small boat fishing. Impacts on these activities were expected to be substantial.

3.124 Safety concerns about loss of sheltered fishing areas were raised. It was noted that strong tidal flows and seabed hazards limit alternatives in this region.

3.125 Impacts on migratory fish were also a concern. Consultees pointed out that three salmon rivers run into the Bay. Cree Valley Community Council noted the importance of the Rivers Dee, Fleet, Cree and Bladnoch for salmon and sea trout rivers, and noted the extensive work being undertaken by the Galloway Fisheries Trust to maintain and improve conditions for all fish species using the Bay. At the Dumfries local consultation workshop it was reported that eleven important salmon rivers drain into the Solway. Whilst it was recognised that there is ongoing research in this area, people felt the Plan should consider this further. The importance of the area for Smelt (nursery and spawning ground) was emphasised by several individuals and organisations.

3.126 Impacts on recreational sea angling were noted, and it was suggested that any reduction or loss of this activity will have economic impacts, relating to the area’s broader tourism product.

Other environmental issues

3.127 The RSPB provided detailed responses to the plan as a whole including references to this development. It noted that the SEA should recognise the Wigtown Bay (Cree Estuary) SSSI which is internationally important for migratory waterfowl and the largest Local Nature Reserve (LNR) in the UK. Significant issues were raised in relation to whooper swan, pink-footed geese (both of international importance) and pintail and curlew, and the common scoter (nationally important),
Manx shearwater and diver species. They also noted that increasing numbers of barnacle geese are now using the Bay in winter, and that the area is used by nationally important breeding gannets from Scare Rocks and auks from their Mull of Galloway reserve, as well as Manx shearwaters in summer. These concerns were also reflected in the comments of the local LNR management committee, who also provided comments on the importance of the area for birds, potential connections with the Crook of Baldoon, and associated effects on important fish species in the area. Concerns included impacts on passage through the area, feeding areas and the risk of bird strike. Links with plans for a biosphere reserve were also noted.

3.128 Several other consultees raised further environmental concerns. Impacts on biodiversity were raised by many people and organisations. In particular potential conflicts with seabirds, migrating geese, and effects on associated local nature designations were noted. The importance of the estuary and bay, and migratory routes was stressed. Linking with this, impacts on wildlife tourism were also raised. There was wide agreement that a Habitats Regulations Appraisal of the plan was essential. Vibration impact on porpoises, dolphins and basking sharks were also a concern. Cree Valley Community Council raised concerns about impacts of development on birds, including geese and swans, ospreys, seagulls, wading birds and ducks that feed in Wigtown Bay. They also noted potential for sediment transportation and disturbance of the seabed, with consequences for shellfish, crustaceans and bottom feeding fish, and potential destruction of fish feeding and nursery grounds. Also with regard to sediment, the issue of radioactive particles within sediment was raised at the Wigtown workshop event.

3.129 Cultural heritage issues included impacts on St. Ninian’s landing and on local cultural diversity more generally, with references to artists, including the Glasgow Boys. Historic Scotland noted that there are several important coastal sites that could be affected by the project. This includes impacts on setting of scheduled coastal fortifications, chambered cairns and early church sites. They suggested this could be explored further at the project level.

3.130 Concerns about coastal erosion and the impacts of development on waves were raised.

3.131 Some consultees raised issues about munitions in the area. Several were concerned that munitions have migrated from Beaufort’s Dyke and been washed up on shore. Given uncertainties, it was suggested that mapping of this was not feasible. Other technical constraints were raised including proximity to Dundrennan Range and two major gas pipelines. Low flight training and Ministry of Defence activity were also raised as possible constraints.

Shipping and navigation

3.132 In terms of shipping and navigation, it was noted that the data used in the SEA (AIS) does not cover small fishing vessels. This was considered to be a significant issue. Potential problems for navigation were raised, including effects on the safety of small boats such as those of recreation users. The importance of this for tourism and the local economy was emphasised. Cree Valley Community Council explained that the development could restrict entry to harbours at the Isle of
Whithorn, Kirkcudbright, Creetown and Carty Port. It was noted that access to Portmacadam / Gatehouse of Fleet has already been denied by a bypass road below the harbour. Furthermore, restriction of access to the sheltered anchorage behind Murrays Isles would also be made more difficult. These views were also confirmed by the wider public attending the local workshops. At the Dumfries workshop, for example, the need for a full navigational assessment was noted.

3.133 Small cruising yachts criss-cross the whole area of Wigtown Bay and indeed the whole of the Solway, visiting harbours, bays, inlets and anchorages throughout the season, many of them based locally or visiting from Cumbria, the Isle of Man and Ireland or further afield. People called for the importance of the area for recreational boating to be recognised within the Plan and its SEA.

Short term options: Solway Firth

3.134 Most of the issues raised in the case of Wigtown Bay were equally applicable to the proposal for the Solway Firth option. A significant share of responses focusing on this project came from campaigns, form letters and petitions. This included a series of letters from local people, and a group of responses from visitors to the area. The total number of people objecting was almost identical to those campaigning against Wigtown Bay, at 205 (as compared to 200).

3.135 Unsurprisingly, given that the project is effectively an extension of the existing Robin Rigg site, cumulative effects were a dominant issue for this site. Several respondents were concerned about turbines extending across the Firth. Points raised above about publishing and making use of evidence from the Robin Rigg development were strongly reinforced within responses relating to this specific site.

3.136 The same concerns about these impacts and their relationship with local people and visitors was raised. The majority of consultees (a significant number) felt the project was too large in terms of scale, numbers and potential size of turbines, and too close to shore. Impacts on the special qualities of the East Stewartry National Scenic Area (NSA) were a focus here. In addition, cumulative impacts on the Colvend coast were repeatedly raised.

3.137 Concerns about the yield from the site due to low wind speeds were possibly even greater for this project than for Wigtown Bay. Many people were concerned about efficiency and subsidy of the project.

3.138 At the Wigtown public workshop, local people expressed concern that Dumfries and Galloway Council had objected to the Robin Rigg development, but that this had not triggered a public local inquiry, and it was expected that this might happen again. At the meeting, initial confirmation was given that the new marine planning and licensing process would overcome this issue. However, subsequently, as noted at the meeting of the Stewartry Area Committee, Marine Scotland officials explained that this issue would be revisited, and that the process will need further examination and explanation.

3.139 In addition, the following issues were raised specifically in relation to this project:
• Impacts on coastal paths were noted by several people.
• It was suggested that economists should aim to establish the economic value of the area’s coastline, to get a more accurate idea of impacts.
• The site was noted to be an important fishing ground for plaice, skate, turbot, brill and cod.
• Concerns about navigation from Maryport were also emphasised (as with Wigtown Bay) and in addition impacts on Whitehaven were also noted.

3.140 At the Dumfries public consultation workshop, it was strongly recommended by the group that the lessons learned from Robin Rigg should firstly be established, before any thought is given to an extension or other development in the area.

Medium term options

3.141 Several consultees objected to all of the sites in the wider South West region. Many were concerned about the impact of these sites on the Machars peninsula and the Mull of Galloway. The overall scale of development in the area was repeatedly raised and considered unacceptable. The impacts most frequently identified from the medium term sites related primarily to landscape and visual effects, together with secondary effects on communities and the region’s tourism industry. Some suggested that developments would only be acceptable if they were at least 10km from shore.

3.142 Many comments were made about the potential for medium term development in and around Luce Bay. Luce Bay lies to the west of Wigtown Bay and would be potentially most directly affected by the SW3 and SW5 option areas. Some viewed it to be a preferable location when compared with Wigtown Bay, whilst others stressed its environmental importance and did not support it as an option. Several consultees noted that Luce Bay should be regarded as a danger area as a result of the live bombing range and unexploded ordnance drifting from Beaufort’s Dyke. Radar issues were also raised.

3.143 Reflecting concerns raised more generally by others in relation to Questions 1 to 3, the Galloway and Upper Nithsdale Liberal Democrats Constituency Party pointed out that the medium term options in the draft Plan had been identified using criteria that had not been applied in the selection of short term sites. This was viewed as inconsistent and it was suggested that the short term sites were being fast tracked on the basis of commercial interests. A more sound evidence base for the Plan was called for, and it was proposed that an intermediate stage, considering environmental and economic impacts, was needed. This should explore the combined effects of Robin Rigg and the two further short term sites and onshore developments to provide a clearer picture of regional scale cumulative effects, which they expected to be significant.

3.144 A consultee suggested that siting of offshore wind in general should be in remote areas which are not visible to tourists and road users. Distance from land was considered to be important. Alternative sites within the region were suggested, including along the M74, on the top of high buildings in cities, on MoD land which is already in accessible (Dundrennan range), on forested land and west of Ailsa Craig.
3.145 One person supported development in the wider area, as a result of its contribution to climate change and energy suitability. It was argued that impacts on tourism may be overstated, given that there is little evidence on adverse impacts on this sector.

3.146 The Table below summarises specific views raised in relation to each of the region’s medium term options.

<table>
<thead>
<tr>
<th>Option</th>
<th>Comments</th>
</tr>
</thead>
</table>
| SW1    | • Some considered SW1 to be acceptable.  
• The Maritime and Coastguard Agency suggested removing this option.  
• Option designated Navy exercise areas supporting military activities and is therefore a concern. Maintaining ongoing military training should be seen as a constraining factor and considered further.  
• The DETI (Northern Ireland) noted that this site is on the traffic corridor between Belfast and Larne and Loch Ryan, a very significant economic and transport corridor. Development would need proper scrutiny and assessment.  
• Northern Ireland Environment Agency noted that the site lies 34km from the Antrim Coast and Glens AONB, and that minor negative effects had been identified. |
| SW2    | • Visual, tourism and community impacts were raised.  
• This is the area of the largest nephrops fishery in the Irish Sea.  
• Removal of the site was supported and it was noted that munitions may have drifted into this and other areas.  
• The Northern Lighthouse Board welcomed the withdrawal of the area given its implications for shipping in the North Channel.  
• Concerns about impacts on sea angling were also raised.  
• RSPB raised issues about assessment conclusions that impacts were unlikely, noting the paucity of data and the importance of the area as a whole as a major flyway. |
| SW3    | • Visual, tourism and community impacts were raised.  
• The Maritime and Coastguard Agency suggested this option be removed from the plan.  
• There was concern about the lack of a shipping slot allowing vessels clear passage through SW3 from the North of the Isle of Man. Similarly, the Northern Lighthouse Board noted with concern the potential impact of the option on traffic between North West England and Northern Ireland.  
• The area is important for nephrops and demersal fish.  
• Sea angling concerns and diving concerns were raised, and viewed as sufficient to warrant removal of the option from the Plan. Impacts on the seabed and on rare fish species and associate impacts on tourism were also noted.  
• Impacts on the South Rhins, designated as a Regional Scenic Area were noted. |
### West Region

#### Overview

3.147 A total of 355 responses focused on issues in the West region, including a large share focusing on Kintyre (297), some addressing the Argyll Array (26), and some focusing on Islay (7). Others discussed development in the region more generally, including the medium term options and often linking this with concerns about the two short term sites. The majority of responses relating to the region as a whole were from individuals, including some campaign responses from visitors to Kintyre and the members of Machrihanish Golf Club. As well as individuals, the following organisations and businesses responded in relation to the West region:

- Argyll and Bute Council
- Campbeltown Community Council
- Campbeltown Loch Berthing Company
- Chamber of Shipping
- Clyde Fishermen’s Association
- Highlands and Islands Airports Ltd.
- Historic Scotland
- Infratil
- Kintyre Civic Society
- Kintyre Offshore Wind Farm Action Group
- Machrihanish Golf Club
- Manx Fish Producers
- Maritime and Coastguard Agency
- Ministry of Defence
- Northern Lighthouse Board
- Riders of the West
- Royal Society for the Protection of Birds

<table>
<thead>
<tr>
<th>Option</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td>SW4</td>
<td>• Visual, tourism and community impacts were raised.&lt;br&gt;• The Chamber of Shipping raised concerns about the impact of this site on traffic between North West England and Northern Ireland.&lt;br&gt;• This area is important for nephrops, scallops and demersal fish.&lt;br&gt;• Sea angling concerns were also raised.</td>
</tr>
<tr>
<td>SW5</td>
<td>• Visual, tourism and community impacts.&lt;br&gt;• This area is important for nephrops, scallops and demersal fish.&lt;br&gt;• Sea angling concerns were also raised.</td>
</tr>
<tr>
<td>SW6</td>
<td>• Some consultees considered this option to be acceptable.&lt;br&gt;• Diving interests expressed concerns and sought its removal from the Plan.&lt;br&gt;• RSPB raised issues about assessment conclusions that impacts were unlikely, noting the importance of the area as a whole as a major flyway.</td>
</tr>
</tbody>
</table>
3.148 The overall issues raised in relation to this region are shown in Figure 11 below.

Regional scale and pace of development

3.149 A public consultation workshop was held in Campbeltown on 9 August 2010, as part of the consultation process. Overall, consultees were concerned that the whole exercise seems to be industry led. As in the South West region, the pace of development was questioned. Some people suggested that it may be better to go ahead with just one area, rather than ten sites at once. It was also proposed that the Plan and projects should not be taken forward ahead of the National Marine Plan and designation of Marine Protected Areas. Further comments were provided as detailed below.

3.150 In addition, a public workshop was held in Oban on 10 August. More specific comments raised in the workshop are also set out below.

3.151 Argyll and Bute Council provided detailed comments on the Draft Plan and its SEA. It concluded on the basis of the information provided, that the short term option at Kintyre should be removed from the plan. Instead, the Council proposed progressing the medium term option to the south of the Mull of Kintyre (W4) in the short term. This idea was also supported by some of those who attended the public consultation workshop in Campbeltown. Further key issues raised by Argyll and Bute Council included the need to consider cumulative effects arising from the onshore elements of developments and the grid (also raised at the public workshop in Oban), and to give much greater consideration to the socio-economic aspects and impacts of the Plan.
Figure 11: Mapping of Views on West Region

- Other environmental issues
  - Cultural heritage
  - Biodiversity
  - Marine wildlife
  - Birds
  - Ministry of Defence
  - Radar
  - Shipping and navigation
  - Pots
  - Access to the Minches
  - Investment in marinas
  - Knowledge gaps
  - No evidence on predicted benefits
  - Insufficient data within MaRS
  - Further detail on compensation required
  - Insufficient coverage
  - Lack of sectoral engagement
  - Community impact
  - Business impacts
  - Potential for significant losses

- Other technical issues
  - Fishing
  - Salmonids
  - Migratory fish
  - Small vessels
  - No evidence on predicted benefits
  - Insufficient data within MaRS
  - Further detail on compensation required
  - Insufficient coverage
  - Lack of sectoral engagement
  - Community impact
  - Business impacts

- Community
  - Easy to overlook?
  - Environment before people?
  - Importance of proximate communities
  - Quality of life
  - Distance from homes to turbines
  - Proximity to shore
  - Scale of development
  - Areas beyond designations
  - Norther Irish AONB
  - More comprehensive seascape analysis required

- Landscape, seascape and visual effects
  - Scenic quality
  - Sea kayaking
  - Yachting
  - Surfing
  - Informal recreation
  - Tourism and recreation
  - Fishing
  - Salmonids
  - Migratory fish
  - Small vessels
  - No evidence on predicted benefits
  - Insufficient data within MaRS
  - Further detail on compensation required
  - Insufficient coverage
  - Lack of sectoral engagement
  - Community impact
  - Business impacts

- Other international issues
  - Defence
  - Radar
  - Access to the Minches
  - Ports
  - Investment in marinas

- Analysis of Consultation Responses 57
Community views

3.152 People attending the Campbeltown public workshop felt that developments should be refused consent if local communities oppose them. Also in common with the South West, people were concerned that the limited number of local residents within this rural area could mean their views are overlooked. A further view that was shared with other communities in Argyll and also in the South West, was that the Plan appears to have been formed primarily on the basis of environmental information, with insufficient regard given to local people. It was emphasised that development impacts would be greatest from the projects located closest to the shore, specifically the Kintyre proposal, as discussed in more detail below. One consultee suggested that uninhabited islands and remote promontories in this region and the North West would be better alternative locations.

Industry Perspective

3.153 The West Coast Offshore Wind Developer Group welcomed the Plan and consultation on it. However, concerns were raised about the level of detail within the assessment, the inevitable uncertainties about the project level at this stage, and issues around timing and the HRA. The Group felt that it would be useful to explain how ad hoc proposals are covered by the SEA. It was also suggested that better alignment of assessment and mitigation across UK boundaries would be welcomed. Very detailed comments were provided in relation to Table 9.1 of the Environmental Report.

3.154 The assessment of cumulative effects was considered confusing by the developer group, relating more to wildlife and other receptors than those stated in paragraph 8.6.2 of the Environmental Report. It was suggested that the topic of ‘water’ could be scoped out of the assessment, based on collaborative work undertaken on the West Coast. The developers also suggested that there was a need for a flexible approach to consideration of distance in relation to landscape and visual effects, and referred to recent guidance issued by JNCC and SNH during the consultation period, regarding seascape assessment. Further regional queries were raised by the Group including a request for an explanation as to why the tidal project in the Sound of Islay was predicted to have cumulative effects – this was viewed as an overly cautious conclusion at this stage, symptomatic of the uncertainties arising at a strategic level. This issue was also raised by the Crown Estate.

Environmental issues

3.155 The majority of the regional issues in the West focused on the area’s scenic value, general visual and landscape effects of development, with particular emphasis on its tourism and recreation value. The issue was raised and debated at all of the public workshops in the region. For example, at the Oban public workshop, concerns were raised that only National Scenic Areas and World Heritage sites were taken into consideration in the visual impact assessment. Questions were raised as to what is seen as a reasonable distance between turbines and homes (with the suggestion of at least 15 km to the shore). It was noted that the Kintyre site would be visible from an Area of Outstanding Natural Beauty in Northern Ireland. Some participants suggested that a comprehensive seascape analysis would better inform
projects, and highlighted that local authorities have information on sensitive landscapes along the coast to feed into such a review.

3.156 Detailed comments on the value of the area for birds were provided by the RSPB. It was emphasised that the West coast is particularly well used by species migrating from Iceland and Greenland to winter in the UK and Ireland. As a result, large numbers of birds pass through the area, including many species of qualifying interest to Natura sites in Scotland and further afield.

**Tourism and Recreation**

3.157 The importance of the area’s scenic quality for international tourism interest in the area was emphasised by numerous consultees.

3.158 The Scottish Canoe Association was concerned about the impacts of development in this region on kayaking, given that this activity tends to move from island to island and the quality of experience is largely defined by seascape quality. As a result, it was proposed that the east coast would be a more suitable location overall. The Scottish Canoe Association had concerns about developments in the area that are close to land.

3.159 Surfers (Riders of the West) also submitted a detailed response which raised similar concerns about the proximity of the three short term developments in this region to the coast. They expressed concern about impacts on surfing and provided detailed information on current activities including an outline of the great importance of Machrihanish Bay for their activity, serving a wide catchment across central Scotland with significant numbers of surfers and making an important contribution to the tourism sector of the local economy.

3.160 This group provided additional information of relevance to this region, and the wider plan. Reference was made to guidance on the EIA of offshore renewables provided by Surfers Against Sewage in June 2009. Information on surfing areas nationally, and from other offshore wind projects in the UK was also provided, suggesting issues with damping of waves as shown by modelling. Their view was that the proposed scale of development was too great to avoid having such impacts. The Group emphasised the importance of further consultation with surfers and associated businesses to ensure the baseline is accurate and inform future decision making.

**Fishing**

3.161 Fishing was also a key issue in the West region. At the Oban public workshop, people questioned the extent to which this has been viewed as a constraint, and there were concerns that the data used in MaRS would be insufficiently detailed to capture current activity and areas of value. Gaps in knowledge of migratory fish and salmonids were raised, and the Scottish Government confirmed that further work on this is underway. The proposed development options could be on important migratory routes and people asked specific questions about the impact of the Sound of Islay demonstration project on these areas.
3.162 The Small Isles and Mull Inshore Fisheries Group had concerns about the coverage of fishing within the assessment, and considered the overall scale of development to be too great. Their view was that impacts and compensation had been insufficiently covered.

3.163 The Clyde Fishermen’s Association provided a detailed response focusing on fishing. It emphasised the need for development to be sympathetic to this to avoid significant losses. Given the advancement of technology for floating turbines in deeper water, the Association concluded that no areas could be ruled out for renewables, with significant consequences for crab, lobster, scallop and nephrop fisheries. As a result, they called for the Scottish Government to make a decision on the scale of development that would be suitable. This should take into account a fuller assessment of the short and medium term options, with the additional scope for wave and tidal energy. Significant effects on businesses and communities were expected from this scale of development across the sector.

3.164 The Clyde Fishermen’s Association also asked for better consultation, noting their lack of engagement in the process of identifying short term options. Displacement of fishing activity and the possible consequences for safe navigation, merchant shipping, recreational boating were also noted. Comments in the SEA on the environmental benefits of excluding trawlers from areas were disputed, as this is known to not automatically improve environmental status as areas can stagnate or be inundated with invasive species that predate certain stocks. This uncertainty about potential benefits was also reflected by Scottish Environment LINK, in its more general response to the Draft Plan.

3.165 The Association also noted that the VMS tracking data will not reflect vessels that are less than 15m in length. Proper evaluation is required, given that the area of the short term sites is known to be used by such vessels. Lack of knowledge of fish stocks in the SEA, and the secondary effects which could arise from any expansion of fish farms in wind farm areas that are currently productive were also raised as concerns. They also questioned the level of detail that will be addressed within EIA at the project level, having not been party to any specifications for the short term sites to date. Overall the plan was not viewed as constituting a practical set of options from the perspective of the fishing sector and its associated communities.

**Short Term Options - Kintyre**

3.166 A total of 297 responses to the consultation focused on the Kintyre site. Excluding petitions, this was the site with the greatest number of single issue objections, accounting for more than a third of all responses (35%). A large share of these responses were from individuals, but there were also two campaigns in the area: one focusing on visitor views (having been distributed by an accommodation provider from the area) and another bringing together the views of the Machrihanish Golf Club members.

3.167 With the exception of the prospective developer (SSE Renewables), only two letters of support for this development were received. The remainder were objections to the site. The figure over the page summaries the key points raised in relation to the project:
Figure 12: Mapping of Views on Kintyre

**Environmental Issues**
- Visual impact disincentive to visit
- Barrier to investment
- Cost benefit analysis required
- Scenic quality
- Sensitive setting / high scenic quality
- Island, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Technical Issues**
- Morphological assessment required
- Coastal processes
- Stability
- Sediment
- Biodiversity
- Biodiversity
- Marine Protected Areas
- Biocenosis
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Tourism and Recreation**
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Landscapes, seascape, and visual effects**
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Aviation**
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Tourism and recreation**
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Landscape, seascape, and visual effects**
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation

**Technical issues**
- Morphological assessment required
- Coastal processes
- Stability
- Sediment
- Biodiversity
- Biodiversity
- Marine Protected Areas
- Biocenosis
- Isolation, tranquility
- Development proximity
- Quality of life
- Construction noise and disturbance
- Operational noise
- Vibration
- Aviation
- Ministry of Defence
- Preference for wave and tidal
- Lengthening of sea journey time and cost
- Impact on Manx Fleet Fishing
- Shipping and navigation
Landscape, seascape and visual effects

3.168 The majority of responses focusing on this scheme were concerned with its visual, landscape and seascape impacts. The scale of the proposed development and its location in relation to the coast were also noted in most responses. Questions and views on the likely turbine size and configuration were raised. Overall there was consensus that the development scale was substantial and that this, together with its proximity to the shore, would contribute to very significant adverse impacts on the existing scenic character of the area. These views were held by individuals, local businesses and organisations, and national stakeholders. This included Scottish Natural Heritage (SNH) which pointed out that it had already raised concerns about the proximity of the project to shore, and its consequent seascape and visual impacts. SNH was very doubtful that these issues could be mitigated.

3.169 At the Campbeltown public workshop people questioned why options close to St. Kilda had been removed as a result of their visual impacts, but no similar steps had been taken for sites such as Kintyre, that were close to living communities. This echoed a similar view arising in Tiree. People also questioned how the proposal had got this far and asked on whose authority the developer had been able to progress the project.

3.170 The lack of formal designations of the natural and cultural heritage value of the area was noted. Some felt that the area should be designated as an AONB or NSA. The Northern Ireland Environment Agency (NIEA) raised concerns about the impact of the Kintyre site on the Giants Causeway World Heritage Site, noting it was at a comparable distance to that identified in the case of NW3 and St. Kilda. They therefore questioned why this had prompted removal of the latter option, but not the former from the draft Plan. The NIEA also noted that the SEA had identified potential impacts of the development on the Antrim Coast and Glens AONB and the Causeway Coast AONB.

3.171 Particular characteristics and sensitivities of the visual amenity of the area were raised repeatedly, including its sunsets, vistas, and views of the islands. The iconic character of some of these views was emphasised and references were made to artists and others who have valued and celebrated its qualities. Key views noted included those of the Inner Hebrides (Islay and Jura), Rathlin, and the coast of Northern Ireland. Light pollution was also noted as an issue related to visual impacts.

3.172 There were concerns about the use of photomontages by SSER in its local consultation, with many people calling for more or better visualisations to allow for a fuller understanding of these likely impacts to be gained. Some, including Campbeltown Community Council, questioned the accuracy of those provided to date.

3.173 The majority of these responses also noted the close links between the area’s scenic quality, and its appeal to visitors. Many people from much further afield who regularly visit the area also responded to the consultation, including those involved in the local campaign, but also a significant number of other individuals. Other, less
immediate qualities were also raised, including the area’s sense of isolation, tranquillity and wildness.

Tourism impacts

3.174 A significant number of responses were from tourism sector businesses, including accommodation providers. Many, including businesses and the community council, were pessimistic about visitor views on the development, expecting that it would become a disincentive to future visits. One consultee suggested that a survey had shown that 80% of visitors to the area would not return if the scheme went ahead. One accommodation provider had organised a substantial campaign response from recent clients who had stayed in her accommodation, significantly adding to the overall opposition to the scheme. Another respondent was considering investment in a tourism business locally, but suggested that this would no longer proceed, if the development was to go ahead. Some requested a fuller cost benefit analysis and surveys of tourists to be undertaken by an independent third party. VisitScotland supported the numerous individual responses on this point, noting that the project should be considered further given the sensitive setting of the project and its concerns about its proximity to shore and consequent visual impacts.

3.175 A significant number of responses focused on the impacts of the development on golfing in the area. This related partly to its impact on the enjoyment of existing users of the golf course, but also to the implications for future investment in golf and associated tourism development, planned for the Machrihanish Dunes project. This was viewed as being critical to wider aspirations for regeneration of the area. Views on this were raised by the developer of the project, but also widely supported by individuals, businesses and organisations. The golf course architect and existing club captain were clear about their opposition to the scheme, and supported by many others. Many people, including those attending the Campbeltown workshop, noted the special qualities of the view from, and experience of, the first tee.

3.176 As well as golf, surfing was a significant issue raised by many consultees. The impacts of development on wave height, direction, currents and movement of sediments were linked with this, as well as broader environmental concerns. The possibility of a 20% drop in surf was referred to. Baseline information on the important surfing beaches was provided, including Killegruer beach near Glenbarr, Machrihanish and the Gualdrons, and Southend beach at the southern tip of Kintyre. Of these the west coast beaches were considered to offer the best surfing opportunities. Impacts on surfing activity was expected to have a major impact on recreation and tourism. Doubts were expressed about whether effects could be mitigated. This issue was also raised at the Campbeltown workshop, where people felt that hydrological interactions and longshore drift should be considered in relation to the dunes at Machrihanish, and there was concern there will be negative effects on waves, affecting surfing.

3.177 Recreational sailing was raised as an issue by several consultees. Some explained that the area was crucial for sailors as it was on one of two routes around the Mull of Kintyre (the alternative being the Crinan Canal). Safety issues were raised, with those interested in sailing stating that the location of the development could force boats further west into more challenging seas. This would be a particular
issue in the event of stormy weather. At the Oban public workshop, it was explained that the Kintyre site could be an issue for recreational sailing and other small boats, because the area is used by these vessels, and any development will disrupt routes for shelter and safe anchorage. The site would push boats out much further (to Otter Rock) before they could come back into the coast. Tidal turbines at Sanda Sound may also be an issue for yachting and other small boat users, including small commercial vessels. This combined with the Kintyre site would make navigation round the Mull of Kintyre very difficult.

3.178 Detail was provided by the Campbeltown Loch Berthing Company, which likened the development in this location to being “like placing bollards across a motorway.” Comments were also raised on the quality of the cruising experience and the impact of interference with the wind on yachting. The Scottish Canoe Association was also opposed to the development, given its visual impacts, concern about safety issues in rough conditions, and use of Machrihanish beach for surf kayaking.

3.179 Other tourism and recreation activities and resources raised as being vulnerable to this potential development included the Kintyre trail, heritage sites, and birdwatching.

Environmental Issues

3.180 Coastal processes, and impacts on the shore were also raised by several consultees. The Gauldrons were a key concern. SEPA noted that development in this location could downgrade Water Framework Directive status, depending on the scale of development and its footprint. Morphological assessment would also be required. One consultee described their concern about further coastal erosion, having watched the erosion of Machrihanish Dunes over the past 20 to 30 years.

3.181 Issues arising from piling works and the stability of the seabed were also raised, including questions about the stability of the seabed, based on the disused undersea coal / shale workings under the site. This issue was also highlighted at the Campbeltown public workshop event.

3.182 Biodiversity was a concern shared by many consultees. Impacts on: migratory birds (whitefronted geese), fish (spawning fish, salmon runs, impacts of cabling on salmon), seals, dolphins, and sea mammals. As with visual amenity, wildlife was viewed as important in its own right but also an essential part of the area’s appeal to visitors. The proximity of development to the shore was considered likely to exacerbate its impacts on biodiversity (as well as visual effects).

3.183 The RSPB noted the potential for adverse impacts on birds including wintering birds in the adjacent Machrihanish Important Bird Area to the east of the site, and internationally important seabirds within the North Channel (part of the Rathlin Island SPA) that may be displaced through loss of breeding habitat, or be at risk of collision. Migration of a range of terrestrial qualifying species of SPAs, close to and at a distance from the site was also noted, including: whooper swans, Greenland white-fronted geese, pale-bellied brent geese and black-tailed godwit. Reference was also made to the presence of breeding black-throated diver in the region and
uncertainty about its movements at sea. Similar uncertainty was noted in relation to corncrake, although it was noted that it was unlikely that they would pass through the area in large numbers to impact on SPAs for the species.

3.184 One consultee suggested that bird life and seabird records had not taken into account in the assessment. References were provided to sources of further information including local wildlife www.machrihanishbirds.org.uk

3.185 Campbeltown Community Council noted the importance of the natural environment for tourism, stating that some 200,000 seabirds use the seas in the area in summer and late autumn, and that the site is on a southerly migration route. They also suggested that the data on marine mammals in the area used in the assessment was inaccurate, with the observatory logging dolphin sittings regularly, as well as seals, basking sharks and minke whales. It viewed development in this location as potentially conflicting with the designation of the area in the future as a Marine Protection Area.

PETITION

A petition opposing the development has been set up by the Kintyre Offshore Windfarm Action Group. It asks Scottish Ministers to reject the proposed development. At the time of writing (10/12/10) the number of signatories was unclear.

Community Impacts

3.186 The project was considered likely to reduce the value and sale of properties and businesses in the area. General impacts on residential quality of life were also noted including construction noise and disturbance, and operational noise, shadow flicker (linked to stroke and epilepsy) and vibration. People were concerned about direct impacts of activities such as piling on the stability of their properties. Overall, there was consensus that the development was too close to the village to allow for mitigation of what was expected to be significant effects, a view also reported in the Campbeltown workshop. Radio and TV receptions were also a concern. Compensation for homeowners and businesses was sought. People were nevertheless concerned about broader impacts on the ‘way of life’ particularly in Machrihanish village.

3.187 Cumulative effects arising from on and offshore development were noted as a concern. Some felt that this had not been fully assessed in the SEA of the Draft Plan. Questions were also raised about the likely grid connections for the project and the associated environmental impacts.

3.188 One consultee felt that the employment generated by the scheme would be for a small number of specialists from outwith the area, offset by the loss of a large number of local jobs in the tourism sector. Several people felt that the site was at odds with regeneration aims in for the area and investment in infrastructure such as the marina. There appeared to be a common view that the employment and
economic benefits would be achieved elsewhere, with local people only suffering adverse effects. Some attributed this to the current lack of local skills.

3.189 Campbeltown Community Council was unanimously opposed to the inclusion of the site within the plan, on the basis of its visual impact, proximity to shore, impacts on tourism, biodiversity, and environmental quality generally. The Kintyre Offshore Wind Farm Action Group also brought together many of the concerns raised by individuals and other organisations to provide a range of reasons for rejecting the proposal. It was also noted that a formal meeting of councillors, the MSP and community members had concluded with a majority opposing the development. Argyll and Bute Council noted significant concerns about the impacts of the development on landscape, economy and the community, and emphasised the importance of the scenic quality of the west coast of Kintyre for tourism. The Council was unconvinced that any mitigation measures would be effective. As a result, it suggested removing the site and replacing it with W4 in the short term.

3.190 Many local organisations, community representatives and individuals, implied or stated concerns that the site was a ‘done deal’ and would be included in the plan regardless of their views. People also asked for clarification as to why the site had been retained within the plan, despite the SEA having raised significant issues.

3.191 A number of people strongly suggested, as a result, that the site should either be removed from the plan or that its boundary should be moved further offshore to reduce its impacts. Argyll and Bute Council also objected to the site on this basis, and were supported by other organisations in doing so, including Campbeltown Community Council and numerous local individuals.

Fishing

3.192 Impacts on fishing were raised by numerous individuals and also the fishing sector itself. Clam beds, lobster fishing and prawn fishing were key concerns. Fishing interests point out that the development could add substantially (2 hours) to sea journeys for returning fishermen, with implications for costs and emissions. The Manx Fish Producers, had concerns about the implications of development in this site in addition to other areas of the South West for their fleet, arising from the loss of or disturbance to fishing grounds, displacement of activity to other areas and cabling.

Technical issues

3.193 Other technical issues included aviation, with the project being close to Campbeltown Airport, affecting aircraft radar. Highlands and Islands Airports Ltd. (HIAL) noted that the site is within the safeguarded area of Campbeltown Airport, where the presence of turbines could prejudice safety by forming obstacles and affecting radar. HIAL is therefore already corresponding with SSER to reach a solution. The risk of munitions migrating on the seabed into this area was also noted by some consultees. Impacts on Ministry of Defence low flying exercises and exercises at sea were noted.
Other technologies

3.194 As with many other areas, other technologies, specifically wave and tidal were raised as preferences by a number of consultees. The efficiency of this type of energy generation and the likely lack of local benefits was also repeatedly emphasised, although this was perhaps a slightly lower level issue than was the case for those who opposed development in the Solway. At the Oban public workshop event, people asked that a comparison was made between the cost of wave and tidal energy and conventional power stations. It was noted that there may be areas where, for example, wave and wind power can co-exist, and suggest that the Scottish Government should ensure that infrastructure is in place to enable this. The use of floating wind turbines to access deeper water was also suggested. Questions were asked about where the turbines would be sourced from.

Industry Perspective

3.195 The developer (SSER) recognised the environmental constraints for the area, and stated that EIA will address landscape and visual effects at the project level. SSER were concerned that the SEA was pre-empting the EIA process, and clarified that the scheme was 1.3km offshore, as opposed to 0.9km as stated, with the distance to Machrihanish from the nearest turbine being 3km. SSER was critical of some elements of the assessment, including the data on spawning and nursery grounds (Figures 5.6 and 5.8), comments on electromagnetic effects and the cumulative effects on marine mammals and birds of development with wave and tidal.

Short Term Options - Islay

3.196 Fewer responses focused on the Islay project.

3.197 The developer (SSER) raised questions about the accuracy of some of the data used in relation to the assessment of site and directed Marine Scotland towards the scoping study undertaken for the project. It asserted that there will be no loss of feeding habitat arising from the development, as geese feed onshore, and corrected a reference to electromagnetic fields impacting on marine mammals within the SEA. It also proposed that further work was required to assess the cumulative effects arising from offshore wind, wave and tidal.

3.198 Concerns about the development raised in responses related mainly to its potential landscape and visual impacts, and effects on wildlife. Some respondents noted the particular landscape and seascape quality of the region as a whole, and suggested the removal of the Islay project along with other options as a result.

3.199 A public workshop was held in Islay on 22 September 2010 to further support the consultation process. People attending the event raised fundamental questions about the rights of the islanders to the seabed, questioning the authority of the Crown Estate to progress development and echoing the views expressed by the fishing sector representatives in Barra. Clarification of the licensing process was sought including the treatment of on and offshore issues together, and people were
concerned that the community should have a role to play in the decision making process.

3.200 There was also extensive discussion focusing on the findings of the SEA process and the process of identifying and assessing options within the Plan. Concerns were expressed about the visibility of the turbines from sensitive areas on the west of Islay, potentially affecting both local communities and visitors. People were concerned about the impacts of construction and maintenance on the island, and reassurance was sought that this would be kept in balance. It was noted that other issues included grid access, construction bases and support infrastructure would emerge at a later stage in the process. The importance of further contact between the Islay Energy Trust and the wider community and the developer was emphasised and it was noted that this should also involve fishing and other sectoral interests. Further consideration of how local businesses and the community can benefit from development, or at least be compensated for its impacts was also considered to be a priority.

**Short Term Options – Argyll Array**

3.201 Twenty six responses were opposed to the proposal for the Argyll Array, with a number of detailed views coming forward from community organisations and individuals who live on Tiree. To support the consultation process, a public workshop was held on Tiree on 16 September 2010.

3.202 The diagram below sets out the key issues raised in relation to the Argyll Array development.
Figure 13: Mapping of Views on the Argyll Array

SHORT TERM OPTION: ARGYLL ARRAY

Other environmental issues
- Ecology
- Birds
- Marine wildlife
- Machair
  - Scoped out of EA
  - Community participation in decision making - statutory consultee
  - Developer engagement
  - Further information on proposals
  - Methodologies
  - Masterplanning
  - Community benefit
  - Noise assessment
  - Landscape and visual impact assessment
  - Outdated guidelines

Assessment, plan and consenting process
  - Proximity to shore
  - Scale of development
  - Turbine height
  - Skerryvore
  - Scenic quality of island and seascape
  - Project visualisations
  - Assessment methodology
  - Sense of place
  - Industrialisation

Landscape, seascape, visual
  - Infrastructure
  - Helicopters
  - Noise
  - Mitigation required
  - Building on croft land
  - New housing
  - Road widening
  - Road safety
  - Schools
  - Services
  - Housing
  - Health services
  - Sewage infrastructure
  - Construction activity

Technical issues
  - Aviation / radar
  - Small boats
  - Fishing
  - Links with community
  - Fuller assessment required

Economy
  - Limited employment
  - Property values
  - Business vitality

Culture
  - Living culture
  - Archaeology
  - Setting of sites
  - Minority groups

People
  - Limited numbers - easy to overlook?
  - Living entity
  - Fragile
  - Unique
  - Quality of life
  - Tranquility
  - Cumulative effects

Onshore development and impact
  - Community
  - Infrastructure

Surfing
  - Visual impacts
  - Tourism impacts

Houses

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Community

3.203 The most prevalent concern raised by both formal written responses and discussed in the public workshop was the effect that development could have on the culture and quality of life of Tiree. Many questions were asked about the impacts of offshore development and its onshore components on the island’s environmental quality, infrastructure and community. One individual summed up concerns by noting issues including helicopter flights, road widening, buildings on crofting land, housing for workers (one third of the current supply) and eloquently envisaging: “A vast energy factory will deface the island's natural beauty and change its peaceful community forever.” Some felt that the economic benefits would be limited to a small number of people, and that change could particularly impact on the elderly, families and young people, for whom quality of life was in question. Whilst some issues such as property prices were raised, the majority of views were quite fundamental, going as far as considering future viability of Tiree’s population. Whilst the development is potentially of regional significance, sitting within national plan, some consultees emphasised that the majority of the impacts of the development will be on the proximate community of Tiree, and this must be recognised and addressed as a priority. This view was strongly supported throughout the public workshop on the island.

3.204 The community attending the workshop in Tiree were concerned that they had been largely ‘scoped out’ of the EIA scoping report. There were strong views that development on land arising from the offshore array would need to be considered within the assessment, and disbelief that the island’s culture and people had not been referenced. This was viewed as essential, so that potential for mitigation measures, like managing construction to provide regular quiet periods, could be brought into the process. As with consultees in the South West and in Kintyre, people were concerned that the limited number of people in the island would reduce the weight given to their views within the overall planning process.

3.205 Concern was raised in the Tiree public workshop that current government guidelines for noise are outdated. It was noted that many acoustics companies are no longer relying on guidance due to its currency, however noted that this is what is being used to inform assessments. Questions were raised about the implications of infrasound on human health.

3.206 The Tiree Community Development Trust felt that the assessment should consider communities as living entities, recognising that the island’s community is fragile with a unique culture that is more worthy of protection than some aspects of the natural heritage that are designated and therefore more fully recognised in the assessment. Comparisons were also drawn to St. Kilda, and the greater level of protection offered to relics of past communities, compared to the way in which living communities such as Tiree were viewed. This view was supported by those living on the island, regular visitors and respondents more widely. Words such as ‘special case’, ‘unique’, ‘distinct’ ‘pristine’ ‘magical’ and ‘fragile’ were repeatedly used to describe the island and its community. The size of the island was also noted, with some stating that Tiree would be unable to tolerate a level of change that could be more acceptable to larger islands.
3.207 Many individual responses supported this, and viewed the proposal as the industrialisation of the island. It was emphasised that the island’s infrastructure cannot sustain major development. The Tiree Community Development Trust asked that the assessment considers more important aspects of population and health than its current focus on recreational activity. Specifically, it suggested consideration of local health services, traffic and safety, potential failure of the local housing market, impacts on crofting and fishing, under resourcing of education and low water and sewerage system capacity as key issues affecting the island’s community. Demographic change and its potential for secondary effects on services, the community and the environment, was a key issue.

3.208 Many respondents felt that the development would swamp Tiree, and therefore suggested that the community should become part of the decision making process, through working with the development and Argyll and Bute Council to develop a masterplan approach or a pilot study. One individual called for an integrated plan to address the environmental impact of the project, whilst another felt that project specific modelling was required to build a more accurate picture of its effects. There was consensus within the Tiree workshop and amongst those responding individually to the consultation that a socio-economic impact assessment was essential to balance the needs of the community with the environmental issues already addressed in the SEA. However concern was expressed that any such study is likely to be strategic and will need to be supplemented by similar local level studies. The community felt the analysis should focus on impacts on Tiree, as opposed to the wider Argyll and Bute area, and should be undertaken by an independent party.

3.209 Support was given to the communities ‘buying in’ to the process, becoming part owners as opposed to simply passive receptors of its impacts. Several noted that benefits in the form of community funding would not suffice, but much more meaningful involvement was required. Some were interested in how opportunities to harness some benefits from the development, such as local harbour improvements, support for services and possibly employment creation could be secured partnership working. One suggested that the community be afforded statutory stakeholder status to enable their full participation in the process.

3.210 At the Oban workshop, questions were raised as to whether there would be any compensation for those who are impacted most seriously, with particular reference to Tiree, and it was noted that there is a need to consider community compensation and / or benefit if the proposed developments go ahead.

3.211 Impacts on tourism were a key concern. This was viewed as a key part of the island’s economy, but it was noted that visitors come to enjoy peace and quiet, exceptional land and seascapes, wildlife and culture. All of these were viewed as being in jeopardy as a result of the development. As one islander put it: “How many people will travel 4 hours in a ferry to spend their time and money at an industrialised work-site? Islanders have put a major investment into building up their holiday home businesses (2,500 beds). These businesses are currently sustainable and a vital source of income.” Impacts on key characteristics including lack of pollution, tranquillity, dark skies and Hebridean island and Gaelic culture, were viewed by many as sufficient reason to remove the site from the plan.
3.212 At the public workshop, it was reported that 60% to 70% of the island’s tourism is based on watersports including surfing, wind surfing and kite surfing. Questions were asked about the impacts of the development on these activities, and consequently the island’s tourism industry. Previous surveys addressing the impacts of wind farms on tourism were not considered to be relevant, given the much greater scale and density of turbines proposed off Tiree.

3.213 Impacts on surfing were raised by communities, businesses and organisations. Notably, Sportscotland expressed great concern about the impact of the development on the Tiree Wave Classic, calling for more information on the likely impacts on coastal processes and waves.

Cultural Heritage

3.214 Cultural heritage was raised as an issue by the Tiree Community Development Trust, in term of the community’s living culture, but also in relation to onshore archaeology. Historic Scotland supported this view, noting that the proximity of the development to the southern tip of Tiree could suggest impacts on the setting of a number of coastal fortifications and early church sites. As a result, it was proposed that further work was undertaken at the project level in line with the recommendations within the Environmental Report on turbine locations and scheme design. Links were made with the cultural heritage of the island’s people by many consultees, and raised in the public workshop on Tiree. It was noted that EC and UN legislation afford protection to minority groups. Participants also noted the increasing recognition of the value of historic sites on and around Tiree, and stated that the EIA should investigate and mitigate impacts on marine archaeology. There are 14 known wrecks around the island.

Landscape, seascape and visual impacts

3.215 Impacts on landscapes and seascapes were raised repeatedly, with the Tiree Community Development Trust noting the relative proximity to shore and larger size of the proposed turbines, as compared Skerryvore lighthouse. Individuals from the island were supported by those from further afield who valued Tiree and the broader West region for its scenic quality and expressed concern about the impacts arising from development of the scale proposed.

3.216 In terms of visual impacts, at the public workshop people noted that the turbines would be taller than the highest point on Tiree. People were disappointed that they had not had sight of photomontages for the project, and this was reinforced in a number of subsequent individual responses. Within this, there was concern that in selecting viewpoints, some of the most sensitive areas would be missed, and the community were considering preparing their own visualisations as a result. Some called for visualisations to be produced and discussed within a public forum – it was viewed as insufficient to rely on information from other sites of a less significant scale and density.

3.217 People questioned the methodology for visual and seascape assessment, and asked why Tiree did not fall within the category of a high sensitivity seascape. There was disagreement with the terms of the guidance in this respect, and people sought
clarification of the methods and definitions used. Differences between objective landscape or seascape impact assessment and more subjective visual effects were discussed.

3.218 Linking with this, values such as tranquillity and the unspoiled character of Tiree were mentioned by several consultees. SNH, however, contended that at this stage the SEA may have overestimated the landscape and visual impacts of the Argyll Array, withholding fuller judgement until the scoping response for the project had been received and analysed. Regardless of views, the community called for further information to be provided by the developer at an earlier stage to allow for a more informed discussion.

3.219 The Tiree Community Development Trust asked for clarification as to why the short term options were closer to shore than the medium term options, and specifically for information on the constraints that limited the proximity of area W2 to shore.

Other environmental issues

3.220 The ecological qualities of the island were raised, and considered to be vulnerable to development of this scale in this location. Its status as a SSSI and importance for corncrake, migratory birds were raised. Underwater noise effects on basking shark, whale, dolphin and other marine wildlife were mentioned. Onshore impacts and implications for the machair was highlighted as a key concern requiring further assessment. Further information was provided, including data on basking sharks in the vicinity of the site. The RSPB stated that the SEA should consider potential impacts on wintering, breeding and migratory birds at an international scale, including species such as Greenland white-fronted geese. Cumulative impacts from the short and medium term options in this area were also a concern. At the public workshop evidence relating to Norfolk seals was raised and questions were asked about the extent to which candidate Natura were given the same level of protection as sites that had been designated.

Technical issues

3.221 Technical issues arising included to the possible constraint of the Argyll Array site’s geology was noted. Questions were asked about impacts on air traffic control, and the potential effects of the development on the island’s weather. Consultees sought reassurance that these matters had been adequately addressed by the SEA. Shadow flicker and light pollution were also raised.

3.222 Fishing was raised as a concern, with the Tiree Community Development Trust suggesting that this should be fully assessed, especially potential impacts on local fisheries. It emphasised that small boats with static gear are more closely fixed to operating port and local waters, and could therefore be more vulnerable to loss of income if development occurs in their area, as compared with more mobile, bigger boats. Opportunities for mitigation, including phasing to allow fisheries to move during construction, were raised.
3.223 As with other areas, quite fundamental questions about energy policy were raised by respondents who were focusing on development at Tiree. It was stressed that, if the development were to proceed, its impacts could call into question the sustainability and credibility of the Scottish Government energy policy overall. Some suggested that the policy was being implemented at too fast a pace to allow for full and proper consideration of its impacts.

3.224 As with Kintyre, many people noted and concurred with the conclusions of the SEA that the development was likely to have significant adverse effects, and therefore questioned why the project had nevertheless been taken forward within the Draft Plan. There was a degree of scepticism associated with the extent to which options within the Plan were genuinely open for debate. There was consensus that the development should only proceed if there was consensus amongst the islanders (one suggested a referendum), and full engagement in decision making.

3.225 Several individuals and the Tiree Community Development Trust noted the importance of assessing the aggregated impacts of the short and medium term options. It was noted that, should it proceed, the Argyll Array could become a centre or base for the construction of other options in the medium term, specifically areas W1, W2 and NW4. As a result its cumulative effects could be expected to be significant.

Consultation and Decision Making

3.226 Respondents seemed unconvinced that mitigation would either be taken forward for the scheme, or that it would be effective. One mentioned that acknowledgement by the developer to date had been targeted at the island’s fishermen and not the community as a whole. The same respondent also expressed concern that there is a lack of a regulatory body to impose mitigation measures on developers. The proposal was considered to be of a density and impact ration which was incomparable to any other development in the UK or Europe. It was contended that such a development could only arise from a policy making process which excluded the proximate community from any representation in the formal consultation process.

3.227 Questions were asked about the consultation to date, specifically the extent to which the whole community and groups such as the crofters had been included. Local people were concerned about the limitations of consultation at both the plan and project level, and viewed further working with the developer as an essential requirement. Views on the methods for engagement in the Plan varied – some respondents felt that the questions asked too much of consultees, whilst others provided lengthy responses and welcome the open nature of the debate.

3.228 The approach to consultation on the Plan was also discussed in the Tiree workshop. People were concerned that decisions had already been made on the principle of the development, and clarification that no decisions had been made on any of the options was welcomed. The community felt they needed to be more fully aware of the on and offshore proposals and their impacts before they could provide a meaningful comment on them. There was also consensus that the community of Tiree should be regarded as a statutory consultee within the process, fuelled by
frustration with current limitations on their inputs. People were also seeking further information on the decision making process at the project level, and the extent to which an objection by the local authority could initiate a public inquiry.

3.229 At the Tiree workshop, further clarification of the licensing process was requested and people asked about the extent to which decisions would focus on the project area, or take into account the wider area including Tiree. People were also seeking further information on where responsibility for approving onshore developments would lie.

3.230 Broader issues were raised in the Tiree workshop about the timing of phases of development within the Plan. It was suggested that areas with least environmental constraints should be prioritised in the short term. Comments on the scale of development were also raised, with people suggesting that it would be preferable to initially develop smaller sites around Scotland that feed more directly into local areas of consumption.

Industry Perspective

3.231 A different perspective was provided by Scottish Power Renewables, the prospective developer of the Argyll Array. Whilst the Draft Plan was welcomed, concern was expressed about the level of uncertainty arising from the assessment at this level, and in particular in relation to the medium term priorities, technical constraints and the future evolution of the supply chain. As a result, SPR suggested that the Plan should present options in a different way to the spatial approach within the draft. This would ensure that mitigation is not suggested at the SEA, where there remain uncertainties in the assessment findings. In contrast, however, communities suggested that the assessment at this stage was essential to ensure opportunities were built into the scheme 'from birth.'

Medium term options

Other Technical Issues

3.232 The Chamber of Shipping raised concerns about site W1 and its impacts on shipping passing through the Minch, and area W4 and its impact on vessels entering the IMO route in the North Channel. The Maritime and Coastguard Agency echoed concerns about area W1 and its potential to restrict access to the Minch and recommended its removal from the Plan. It also noted, however, that it may be possible for developers to show that, given gaps or restrictions in operations, risk can be sufficiently reduced to permit other areas in the region to progress. The Northern Lighthouse Board also raised the same navigational concerns about areas W1 and W4.

3.233 Conflict of interest arising from area W4 with investment in infrastructure and the new quay for shipping wind turbines, marine, other commercial activity was noted by one respondent. It was explained that the Council's CHORD economic regeneration programme and EU Sail West scheme could be undermined by any development that impacts on the accessibility of the marina. Impacts of development on recreational boating and the new quay was also emphasised as a
concern, with the suggestion that the eastern boundary of W4 could be drawn back and the site extended further west.

3.234 Areas W1 and W4 were also raised as concerns by the MoD as potentially impeding naval operations in direct support of national defence requirements. It therefore requested their relocation or re-examination. W4 also emerged as a concern for aviation by Infratil, operator of Prestwick International Airport.

Other Environmental Issues

3.235 Historic Scotland provided comments on the medium term options in the area, including to note that the proximity of area W1 to the southern tip of Barra suggests that there may be impacts on the setting of coastal scheduled duns and Barra Head Lighthouse. As a result project level assessment and mitigation will be required. The location of W4 between islands and the mainland also suggested to Historic Scotland that there may be potential impacts on the inter relationships between South Arran, Sanda, Ailsa Craig, Kintyre and Ayrshire coast that need further consideration. Sightlines to, from and between these sites are important for a number of historic environment assets in the area. Recommend this is explored at project level. Some individuals also considered W4 to be located too close to the coast, generating significant visual and seascape impacts and resulting in loss of tourists to the area.

3.236 The RSPB provided detailed comments on the options in the region, expressing concern that these could exacerbate the effects identified for the Argyll Array, “with the a risk of cumulative potentially massive impacts on a range of species – particularly on populations of birds using the East Atlantic Flyway such as the whooper swan, Greenland white-fronted goose, Greenland barnacle goose, pale-bellied brent goose, golden plover, sanderling, turnstone, black-tailed godwite etc – as well as impacts on locally breeding birds such as corncrake (W1-W3) and locally breeding seabirds”. Concern was also raised about cumulative impacts on birds attempting to travel through the Minch, including impacts on foraging trips of breeding seabirds from SPAs. The proposals were considered to potentially form a barrier across the Minch, resulting in displacement. It was recommended this is explored more fully in the HRA and reflected in the finalised Plan.

3.237 Several individuals also expressed concern about the impacts of some of the region’s medium term options for a variety of reasons, most frequently visual impacts and tourism. Several of those who were focusing on other areas such as the South West, also mentioned general concern about development in this region, given its environmental quality and importance for tourism nationally. This included one respondent, for example, who raised concerns about the landscape and seascape impacts of areas W1, W3 and the area’s short term options, and noted particular issues with W2 where views from Colonsay and wild land on Jura could be significantly affected.
North West Region

3.238 A smaller number of responses to the consultation focused on development in the North West Region, including 11 from the following organisations:

- Chamber of Shipping
- Comhairle nan Eilean Siar
- Historic Scotland
- Maritime and Coastguard Agency
- Ministry of Defence
- Mountaineering Council of Scotland
- Northern Lighthouse Board
- Royal Society for the Protection of Birds
- Scottish Canoe Association
- Scottish Environment Protection Agency
- Scottish Natural Heritage

3.239 To support the consultation process, public workshops were held in Ullapool on 3 August, in Stornoway on 13 August and on Barra on 8 September 2010.

3.240 The key issues raised in this region are summarised in Figure 14 below.

Decision making

3.241 The Comhairle nan Eilean Siar (Western Isles Council) provided a detailed response relating to developing in the region as a whole. It proposed that the approach within the Plan was insufficiently flexible to allow development to progress at different speeds, and sought higher prioritisation of development in the area in the short term. It did not wish to see any options removed from the Plan and explained the importance of the renewables sector to the economic future of the Western Isles.

3.242 At the public workshop in Stornoway, concerns were raised that the local authority’s views could be ignored. People at this event were also critical of the consultation process, and reported feeling disengaged from the process. People felt that priorities should be revisited, as other factors appear to be overshadowing the views of people. As in the West Region, some consultees felt that the planning process was being progressed too late, after the 10 exclusivity agreements for the short term sites had already been granted. Questions were asked about links with and between national and regional marine plans, and consideration of Marine Protected Areas.
Fishing

3.243 Fishing impacts were a concern of regional significance. Overlapping with comments on the West Region, the Small Isles and Mull Inshore Fisheries Group raised concerns about most of the options in the Plan and noted the need for further detailed information and assessment to avoid adverse impacts on fishing. Concern was also expressed at a public consultation workshop in Ullapool (3 August 2010) about a perceived lack of adequate engagement with the fishing industry, and it was suggested that inshore fisheries groups and local fisheries offices were used as a channel to informing individual fishermen about the Plan.

3.244 Fishing was discussed at the Stornoway public event, and participants asked for fuller mapping of the productive levels of areas for fishing in relation to the medium term options. Concerns were raised that the impacts of renewable energy would add further pressure in addition to ongoing challenges for the industry, such as fuel prices. People suggested a common sense approach to exclusion zones, recognising the issues for different types of fishing activity. The need for further baseline information was noted.

3.245 Fishing was also a key issue discussed in the Barra event. People suggested that as fishermen have historically had harvesting rights in the water column, should similarly be entitled to a share of the profits from harvesting wind power in the area. It was suggested that these benefits should have been identified prior to areas being identified, as proposals may change the value of the seabed and therefore impact on whether the community is able to own it.

3.246 SEPA noted that there was potential for option NW8 to result in the downgrading of Water Framework Directive status and would need further assessment, and / or further justification on the basis of there being no other options and socio-economic benefit.

Landscape, seascape and visual effects

3.247 Concerns about visual and seascape impacts were noted in the Stornoway workshop, with implications for tourism. It was emphasised that tourism is growing in the Western Isles in terms of surfing, sailing and sea kayaking.

3.248 Some views focused on the recreational use of the area. The Scottish Canoe Association noted that kayaking could be particularly affected by development of the sites near St. Kilda, Foula (in Shetland) and North Rona, and asked for further opportunities to comment at a later stage.

3.249 The Mountaineering Council of Scotland expressed concerns about some specific areas (see below) and stated that wild land should be given further consideration through further mapping, given the importance of these areas for tourism and in view of the lack of coverage of this characteristic within the National Scenic Area (NSA) designation. It suggested that this is required before any of the options in the area are taken. It was noted that the value and qualities of areas for tourism could not be judged by the numbers of visitors to areas – in many cases the quality of their experiences in the north west is high due to qualities such as
wildness, and loss of this will be more significant than in areas of lower sensitivity, regardless of numbers of people affected. This view was supported by a number of individuals who emphasised the special qualities of the region for tourism and recreation, noting qualities such as scenic value, tranquillity, wildness, and remoteness, as being important. As with the West and South West Regions, the dark skies of the area were also noted.

3.250 Other key issues raised at the public workshop event in Ullapool included potential for visual impacts on people living near the site, recognising that perceptions can be very subjective. Specific points were also made in relation to the medium term option area NW6. Questions were raised about the timescales for the options, focusing in particular on area NW6, and it was clarified that it was unlikely development in this area would arise for several years. The group also requested that further consideration be given to grid connection options for this region.

Other environmental issues

3.251 The RSPB expressed concern that the Draft Plan had not acknowledged the large numbers of resident and breeding, internationally important bird populations in the region. Concern was noted about potential impacts arising from the medium term options on these species. It was recommended that greater consideration is given to potential impacts on Icelandic passerine migrants and Scandinavian migrants moving around the north of Scotland.

3.252 SNH concurred with the suggestion in the consultation questions that there were relatively high concentrations of environmental constraints in this region. In particular, the high number of Natura designated sites with qualifying interests that could be affected by this type of development was noted.

Shipping and navigation

3.253 Further regionally significant issues also included shipping and navigation. Again, many of the key points related to specific sites, but detailed responses were received from the Chamber of Shipping, Maritime and Coastguard Agency (MCA), and Northern Lighthouse Board. Several options raised concerns about important shipping routes, although some of these views were balanced with a recognition that there should be scope for mitigation at a project level, through gaps or restrictions in operations. However, a regionally significant issue emerged in the form of concerns about access to the Minch from both the north and south, that will need further consideration should all of the options in this region be taken forward.

3.254 Navigation issues were also raised at the Stornoway workshop. People felt that there is a need to consider shipping and navigational safety, as some of the options seem to interfere with the traffic separation scheme from the Butt of Lewis to Cape Wrath. The importance of consulting the MCA for local information on navigation was emphasised, and confirmation was given that this will be dealt with in the licensing process.
Other Technical Issues

3.255 The Ministry of Defence raised some further issues including the need to consider air traffic control radars at St. Kilda and South Uist, as these could become a constraining factor for development. Similarly, the Drium-A-Starraird Meteorological Weather Radar near Stornoway would require further assessment.

3.256 The grid was also raised as an issue in the Stornoway workshop. People felt that there is a need to ensure that there is available grid connection, and questions were raised as to whether this had been considered in the process of identifying the short term sites. It was noted that there is a group looking at a strategic plan for the National Grid. Questions about the responsibility for grid upgrades were also raised in the Barra workshop.

3.257 At the Barra public workshop, surprise was expressed that the Plan had included short, medium and long term options as it was presumed that wave and tidal will take over in the long term and that wind is only a short term solution. As in the West Region, people highlighted opportunities to combine these technologies in the future and suggested this is given further consideration.

Medium Term Options

3.258 In terms of specific comments on the medium term options, the following specific views were recorded:

<table>
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<tr>
<th>Site</th>
<th>Comments</th>
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| NW2  | • The West of Four Fisheries Management Group (WOFFMG) concerned about impact on fisheries.  
     | • Historic Scotland agreed with assessment of impact of this option on St Kilda WHS.  
     | • Area of exceptional landscape and seascape quality.  
     | • RSPB surprised that effects on birds not expected to be significant, given proximity to SPAs. Potential barrier to species migrating from Iceland was noted. |
| NW4  | • May affect naval operations in direct support of national defence. Dimensions may require amendment and further consideration at the project level is needed.  
     | • Northern Lighthouse Board and the Chamber of Shipping concerned about potential cumulative impact on shipping through the Minch.  
     | • WOFFMG concerned about impact on fisheries.  
     | • Area of exceptional landscape and seascape quality. |
| NW5  | • May affect naval operations in direct support of national defence. Dimensions may require amendment and further consideration at the project level is needed.  
     | • Northern Lighthouse Board and the Chamber of Shipping concerned about potential cumulative impact on shipping through the Minch.  
<pre><code> | • WOFFMG concerned about impact on fisheries. |
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|      | • The Stornoway workshop noted a high number of smaller fishing vessels operating in this area.  
|      | • Mountaineering Council of Scotland concerned about the impact of this option (parts nearest land, impacts on wild land / high sensitivity seascapes). |
| NW6  | • In proximity to sensitive MoD acoustic range facilities in Danger Area D71 near Rona. MoD extremely concerned about location and extent of zone, suggesting relocation.  
|      | • Northern Lighthouse Board and the Chamber of Shipping concerned about potential cumulative impact on shipping through the Minch.  
|      | • WOFFMG concerned about impact on fisheries.  
|      | • Mountaineering Council of Scotland concerned about the impact (parts nearest land, impacts on wild land / high sensitivity seascapes).  
|      | • This area was raised as a concern by an individual as a result of its location in an area of exceptional landscape and seascape quality.  
|      | • People attending the Ullapool workshop also noted the importance of the area as a route for cetaceans, with the area around Skye being frequented by basking sharks. It was also stated that the area could pose problems for fishing as it is an area which is used for trawling.  
|      | • It was noted that the area is known for Nephrops in the Stornoway workshop. There are also a lot of smaller vessels operating in this area. |
| NW7  | • Will impede naval operations in direct support of national defence requirements. MoD request it is relocated or its dimensions re-examined.  
|      | • Chamber of Shipping expressed concern about impact on shipping through the Minch. The site also impacts on traffic using the west coast deep water route and Atlantic traffic.  
|      | • Maritime and Coastguard Agency suggest removing the site to permit safe access to ships.  
|      | • Northern Lighthouse Board noted with concern potential cumulative impact on shipping through the Minch and noted that the site also has an impact on traffic using the West Coast Deep Water Route and Atlantic traffic.  
|      | • WOFFMG concerned about impact on fisheries.  
|      | • Mountaineering Council of Scotland concerned about the impact of this option (parts nearest land, impacts on wild land / high sensitivity seascapes).  
|      | • This area was raised as a concern by an individual as a result of its location in an area of exceptional landscape and seascape quality.  
|      | • RSPB noted that the western arm of the area could form a barrier across the main arrival point for Whooper swans, Greenland geese species and other waterbirds migrating from Iceland in autumn, given that this is the shortest sea crossing route.  
|      | • A possible increase in mobile gear activity was noted. |
**Site | Comments**
---|---
NW8 | • WOFFMG concerned about impact on fisheries.
• Historic Scotland noted that this area is centred on north Rona. It contains the scheduled early monastic site of St Ronan’s church, and remoteness contributes to its setting. As a result, project level assessment and mitigation is required.
• RSPB surprised that effects on birds not expected to be significant, given proximity to SPAs. Potential barrier to species migrating from Iceland was noted.

**Question 5: Are there other options we should consider in the medium or long term?**

3.259 This Question invited views on other options that could be considered over the longer term.

3.260 Some respondents suggested that other technologies, specifically wave and tidal would be better options in the long term. Wave and tidal in areas closer to the end user were suggested as an ‘ideal’ alternative. A large share of those supporting tidal energy were referring to the South West region, with many mentioning the possibility of a Solway tidal barrage as a greatly preferred option to offshore wind.

3.261 The RYA asked that the relationship between floating wind farms in the longer term, wave and tidal be thought through. This was based on concern about the cumulative impacts arising from neighbouring renewables developments, but also the opportunities arising from possible sharing of facilities such as power connections to minimise infrastructure requirements. Other consultees debated this further, noting that marine planning should consider which areas would be best suited to different types of renewable energy generation. This was based on an assumption in some cases that one type of installation could preclude the others.

3.262 Hydro, land based wind power, carbon capture, hydrogen and nuclear options were also raised. Many noted that energy efficiency and reducing consumption would be preferable to any generation methods.

3.263 Responses noted uncertainty over the longer term, and the need to keep an open mind about emerging technology and options which are not currently apparent but could become practicable in the future. Several felt that it is likely, with some, such as VisitScotland noting that the review process should reflect these. References were made to new areas arising in deeper water, the use of floating turbines and the use of shared infrastructure such as grid connections. This linked to comments throughout the responses about developments being ‘in-shore’ rather than ‘offshore’ and expressing a preference for the latter within the Plan.

3.264 Some noted that other areas that were not currently viewed as options at present should not be ruled out at this stage as they may offer good opportunities in...
the future. They suggested that it cannot yet be concluded that they are unsuitable on the basis of information gathered to date, just as conclusions about suitability remain difficult at this stage. Others asked for explanation of how ad hoc proposals are covered by the SEA. Fife Council noted that the Plan should be sufficiently flexible for new options emerging in the longer term to be environmentally assessed in a consistent way.

3.265 Scottish Natural Heritage recommended consideration of the demonstrator sites at Aberdeen and Methil, and that developer aspirations for new and emerging technologies including floating turbines were taken into account. They also noted this should be taken into account within the HRA.

3.266 Some respondents suggested areas with highest wind speed should be prioritised. These tended to be those who were opposed to development in the Solway where wind speeds are considered lowest. Dumfries and Galloway Council specifically noted the low wind speeds in the Solway, as shown in Figure 5.1 of the Environmental Report.

3.267 Fishing sector respondents recommended that areas with fewer sensitivities for fishing would be preferable. Some respondents from this sector were quite clear that there were no other suitable options, including the Scottish Fishermen’s Federation and fishing interests in the North, who noted that Shetland’s waters were already largely filled with development options. However, it was also suggested that the fishing industry should have further dialogue with Marine Scotland, to help identify less sensitive areas (specifically referring to the South West).

3.268 Comhairle nan Eilean Siar felt strongly that some of the options in the North West should be considered and assessed as possible short term options. A developer also requested the inclusion of a specific demonstration site within the plan (Firth of Forth / Musselburgh Bay).

3.269 Argyll and Bute Council felt that if the SEA was robust, it should be regarded as the appropriate means of identifying development options. It also noted the many uncertainties at this stage and the difficulty with forecasting development in the medium to long term. Some consultees preferred medium term options over short term options. This included sites in the South West (in preference to Wigtown Bay and Solway options) and Argyll and Bute Council’s support for area W4 in preference to Kintyre in the short term.

3.270 Aberdeen City Council asked for clarification as to whether the 25 options constitute the total potential of Scottish Territorial Waters, or are simply the most appropriate sites to focus on in the short term.

3.271 Some novel locations were also suggested by some individuals, including along major transport infrastructure (M74), on the tops of high buildings in cities and making better use of MoD land where access and visibility are currently restricted.
Question 12: The Draft Plan has identified environmental and technical issues in the north and north west regions of Scotland, in particular. It may therefore be reasonable to give further consideration to these regions. Do you think that development in these regions, or individual options within them, should be given lower priority or perhaps deferred to the long term?

3.272 Several consultees restated views they had already put forward in response to the fourth consultation question. This included lobbying to remove Kintyre and the Argyll Array and further comments on development in the South West, as discussed below.

Support for deferring options

3.273 Eight consultees agreed that development in the North or the North West could reasonably be deferred. The Scottish Fishermen’s Federation felt that these areas could be given lower priority, if it is established that they would have a material effect on fishing activity, but noted that further information will be required to justify this. The WOFFMG also agreed. The Small Isles and Mull Inshore Fisheries Group also supported this approach, but noted a need for proper consideration of whether or not options should be dismissed on the basis of environmental issues identified.

3.274 An individual consultee pointed out that options in these areas may not be efficient as a result of the cost and problems arising from the required grid connections. As a result, further assessment of the strength of feeling about developments within these areas was suggested. Others considered that de-prioritisation of these areas may be feasible in the early stages, but that the longer term scope for development should be taken into account when opportunities for extending the grid network to support terrestrial wind farms were being considered.

3.275 The Scottish Boating Alliance felt that this area was one of Europe’s last accessible wildernesses, and important for recreation and tourism. It felt that there was a case for placing projects in these areas lower on the list of development, to await further technical progress, including tidal generation. Its concerns also extended further south to relate to development of Machrihanish and the seas around the Mull of Kintyre. This was supported by one individual respondent who asked that development was deferred to avoid ‘industrialising’ the water.

Further information required to inform the decision

3.276 Several consultees responding to Question 12 suggested that further information was required before such a decision could be made. This included further analysis of the socio-economic effects of the Plan.

3.277 Some of these consultees felt that, until further investigation was undertaken, all regional options should be deferred. People called for more information on the efficiency of wind power as compared to other forms of generation, to help establish the need for this type of development. Some, such as the Argyll Renewables Communities, considered the short term plan to be ambitious enough, and noted the need for monitoring and evaluation before further decisions are made. NERL again pointed out that mitigation of radar effects can take considerable time to establish,
and that case by case evaluation will be required regardless of location. Scottish Power Renewables felt that there was insufficient information at this stage to assess the medium term options, and were concerned that any prioritisation at this stage could increased pressure on other areas. Other industry representatives restated their views that specific spatial analysis should not be undertaken at this stage.

3.278 Historic Scotland felt there would be benefit in taking forward further work recommended in the Environmental Report, to allow for better decision making. SEPA would also support further assessment of medium term options in north of Scotland prior to finalising the Plan, and suggested deferral of these options to the longer term may be appropriate if this cannot be achieved within current timescales.

3.279 Scottish Natural Heritage concurred that there are greater environmental constraints in these regions, particularly given the high concentration of Natura sites within and around them and the number of European Protected Species known to occur. Given their views on the need for additional information to be built into the process, deferring these areas was recommended until MaRS constraints mapping was rerun to take account of SNH’s concerns.

Development should not be deferred

3.280 However, several consultees argued strongly against deferring options in these areas in response to Question 12. Significantly, Comhairle nan Eilean Siar provided a strong steer towards maintaining the pace of the development, and contended that excluded areas would be short sighted. This echoed responses also provided by Orkney and Shetland Islands Councils which, although not specifically addressing Question 12, reflected strong support for development within these areas.

3.281 The Highland Council also disagreed with removing these regional options. They suggested that they should remain in the Plan, and be considered further the light of further information from monitoring and in relation to the grid. They suggested that, if appropriate, the options could be removed from the Plan in the future. Scottish Renewables and SSE Renewables acknowledged the need to give further consideration to wave and tidal energy developments in these areas, including their interaction with offshore wind.

3.282 The Maritime and Coastguard Agency agreed that these options should not necessarily be ruled out, but made reference to their view that there were significant issues with developments that could act as a barrier to shipping movements in and around the Minches.

Other regions proposed for deferral

3.283 Seven consultees argued for options within the South West to be deferred, instead of the North and North West. It was reiterated that all of the options in the area should await further information to emerge from the Robin Rigg Project. Some pointed out that the South West Region’s significant environmental challenges warranted either deferral or removal of the options from the Plan. Some sought deferral until technology was available to develop wind farms further offshore.
Overall, these consultees felt the Solway was expected to accommodate a disproportionate share of development within the Plan as a whole. Dumfries and Galloway Council suggested reprioritisation on the basis of windspeed, noting the disadvantage of the South West in this respect.

More general points on prioritisation

3.284 Some consultees raised more general points about prioritisation, suggesting that it would be logical to develop the sites with least challenges first. However, IEEM also pointed out that giving some options a lower priority could increase pressure on remaining areas to meet national renewable energy targets. Nevertheless others noted that more significant technical issues would increase project costs, providing incentive to review priorities on this basis.
4. COMMENTS ON THE SEA FINDINGS

4.1 This Section of the Report focuses on two questions that focused on the findings from the SEA. The first (Question 10) asked for views specifically on landscape and visual effects and the scope for mitigating them, whilst the second (Question 11) invited consultees to share their views on the assessment findings more generally, and on any other environmental effects that could usefully be taken into account.

Question 10: The SEA has identified that there could be significant adverse effects, from the Draft Plan as a whole, on Scotland’s landscapes and seascapes. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have a view on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

4.2 A total of 72 responses focused on this question.

Regional perspectives on landscape and visual effects

4.3 Many consultees agreed with the findings of the assessment of landscape, seascape and visual effects. Several reiterated their views on specific developments. In particular, concerns were raised about the landscape, seascape and visual effects of the proposals for Wigtown Bay and Kintyre and also the Argyll Array. Consultees provided more detail on the factors that made these particular options unacceptable in their view, in terms of landscape, seascape and visual effects, including:

- Proximity to shore. This was perhaps the most frequently raised concern.
- Cumulative effects taking into account existing developments (Robin Rigg) and the other options within the Plan.
- Scale of development.
- Density of development.
- Industrial character of development.
- Impacts on iconic views.
- Impacts on sunsets.
- Secondary impacts on tourism enjoyment of an area.
- Proximity to resident populations.

4.4 Dumfries and Galloway Council provided detailed comments on the landscape and visual sensitivities arising from the Wigtown Bay development and were of the view that whilst relocation of the development further offshore would address these effects to some extent, it would also generate further impacts on vessel movements.

4.5 Also focusing on the South West, the Galloway Static Gear Fisherman’s Association felt that the assessment of landscape impact was weak, and was unclear as to how mitigation could be delivered to address effects on seascapes. The Galloway and Upper Nithsdale Liberal Democrats Constituency Party shared this view and were concerned that the assessment had not covered the relationship
between on and offshore developments, viewing the application of separate regimes to these elements as a significant issue. They were unclear how seascape mitigation could be achieved.

4.6 Argyll Renewables Communities felt that there were particular challenges arising from visual impacts on the West coast, taking into account its character and the importance of views from the coast and ferries. They suggested that additional mitigation could include reducing the number of turbines, addressing proximity to land and guidance on lighting.

4.7 Landscape and visual effects in other regions were also discussed. The North Berwick Environmental Trust was concerned about impacts on natural beauty and views potentially arising from development in the Forth, noting the likely severity of effects on the Bass Rock. The Trust was concerned about the impacts on locally important receptors including the relationship between the town and its seascape.

4.8 Fife Council felt that the effects of the Plan would be less substantial than those in the North and North West, and viewed the mitigation measures as sufficient to address the impacts in its region. Aberdeen City Council agreed that mitigation would be impossible given the scale of proposals and taking into account subjectivity of the viewers. It supported the recommendation for a further landscape capacity study but were unsure how effective this would be. It suggested using the European Offshore Wind Development Centre in Aberdeen to test and demonstrate issues raised in the SEA, and undertaken further research. This was a similar response to some other councils who suggested that additional research could be undertaken in areas such as the Western Isles, to increase the benefits from the industry in their area (see below).

4.9 Comhairle nan Eilean Siar felt that St. Kilda was the key visual constraint in their region and that this had been well covered in the assessment. It agreed that it is not possible to hide offshore wind infrastructure from sight, but also emphasised that the region’s communities are open to sensible deployment of development at sea, given that they have always depended on the sea for their livelihood. It was noted, however, that community reaction to the visual effects of development would only emerge through further consultation at a local level. In contrast, an individual consultee felt that all development in this region, together with the West, should be deferred.

4.10 The Northern Ireland Environment Agency welcomed the broad mitigation measures for landscape and seascapes within the Plan, including the commitment to further work at the EIA level to address potential effects of options SW1, W4 and Kintyre on the Northern Irish Areas of Outstanding Natural Beauty. They also welcomed the recognition of WHS within the Plan but suggested that the restrictions applied to developments in the vicinity of St. Kilda WHS should equally apply to the effects of developments in the West on the Northern Irish WHS.

Sectoral Perspectives

4.11 Some noted specific issues arising from a sectoral or interest-specific perspective. For example, the National Trust for Scotland stressed the importance
of seascapes in relation to National Scenic Areas, and noted that there are gaps in information to support consideration of this issue, as many NSAs do not have management or development plans in place. It noted, however, that a number of its properties have outstanding coastlines which could be impacted by proposals for offshore wind.

4.12 Providing a slightly different perspective, the Royal Yachting Association Scotland explained that wildness is an important draw for recreational sailors and that views from vessel to shore are as important as view from shore to sea. They felt that mitigation of impacts on these areas and views would only have limited effectiveness. RYA also discussed options including reducing turbine height, but noted that this could generate higher numbers of turbines and therefore further environmental impacts. They emphasised that mitigation to reduce visual impacts should not undermine this safety driven limitation. It was noted that although wild the nature of some iconic views is likely to be lost, some man-made structures, such as lighthouses, have in themselves become iconic. It was therefore suggested that good design of structures could be part of mitigation. These views were also supported by the Scottish Boating Alliance.

4.13 An individual echoed this view, emphasising that landscape has already been heavily modified and responding to climate change should be a key issue for this decade. As a result, it was suggested that landscape effects should not be given undue influence on the Plan. Another considered that the effects of offshore wind turbines on seascapes would be minimal, and not be viewed as significantly negative.

Scope for Mitigation

4.14 Twenty nine of the seventy two consultees responding to this question felt that mitigation would be insufficient. In some cases, this was because the Draft Plan to date had not addressed their concerns about specific sites by excluding them. This included multiple responses from people who opposed Kintyre and Wigtown Bay on the basis of their landscape, seascape and visual effects.

4.15 Some suggested that reducing the proximity of some developments to the shore would be the only effective mitigation measure. They were concerned about the lack of measures within the SEA. Keep Wigtown Bay Natural referred to the SNH guidance on the matter, and were of the view that this recommended a minimum exclusion zone of 8km from the coast, and up to 13km of the coast was considered to be a sensitive area. Others felt that the 13km distance constituted an exclusion. In comparison, it was noted that the Wigtown Bay site is within 4km of the land and that visual effects would also be exacerbated by the aspect of the site. In response to these issues, the group felt that approach within the SEA to reserving mitigation to the project level was meaningless.

4.16 Several consultees felt that the only effective mitigation measure available at this stage would be removal of options from the Plan. Argyll and Bute Council felt that this should be done where cumulative effects were expected to be significant, or where there would be impacts on local landscape designations or socio-economic
issues. Decisions on this should include consideration of onshore requirements and assessment of their impacts.

4.17 Historic Scotland welcomed the overarching approach to mitigation, and noted that this would involve positioning of sites within option boundaries to reduce their impacts. This was noted to be important when dealing with impacts on coastal historic environment assets, particularly on the West coast.

4.18 In direct contrast to this, developers were concerned that the SEA went too far towards identifying these effects and associated mitigation measures. Scottish Power Renewables, SeaEnergy Renewables, Seagreen, SSE Renewables, E.ON and the West Coast, and Forth and Tay Wind Developers Group all contended that project level mitigation should not be identified at the strategic level, as it would require specialist study in relation to project level EIA. The strategic measure suggested of removing options was not supported by several of these consultees. SSE Renewables, for example, emphasised the risk this would present to projects and asked whether this measure would apply only to medium term options, or also potentially to short term options. Scottish Power Renewables was also uncomfortable with any measures aiming to offset habitat loss at this stage.

4.19 Scottish Renewables summarised the industry views, by claiming that it was not necessary for the SEA to include EIA scale mitigation measures, as these would be explored further at the project level through developer surveys and assessments. They also felt that some of the proposed measures were not supported by evidence – for examples suggestions that navigation should be restricted without full knowledge of levels of use of routes. These shortcomings were viewed as problematic, given their potential to frustrate regional and site level studies, that would explore cumulative effects fully in any case. Scottish Renewables was also concerned about the statement that the 10 short term sites could proceed subject to mitigation, as it was based on incomplete information and insufficient detail at this stage.

4.20 The West Coast Offshore Wind Developer Group suggested that the assessment should be revisited in the light of updated guidance on seascape assessment issues by JNCC and SNH during the consultation period. The need for a flexible approach to distance was emphasised, again reinforcing the view that this is better dealt with at the project level. It was, however, recognised that there would be merit in considering scheduling and aligning mitigation measures on this basis, although SPR pointed out that this may be difficult in practice, taking into account wider issues such as weather. As a result, the Group suggested aligning assessments and implementation of strategic mitigation measures across UK boundaries. A co-ordinated approach was also welcomed by the Crown Estate, which offered to assist with its delivery.

4.21 Some wider consultees supported some of these concerns, with the Highland Council for example noting that whilst cumulative effects and associated mitigation measures needed to be explored, further detail on specific projects would emerge from later, more detailed assessment, allowing for further scrutiny at that stage. Similarly, Highlands and Islands Enterprise felt that mitigation appeared to be
sufficient, but that local concerns about projects and more specific issues would require further work including continuing communications with communities.

4.22 IEEM felt that there should be a greater emphasis within the SEA on national and regional mitigation measures, as opposed to prejudging measures that would be better identified at the project level. In particular, it was noted that cumulative effects will increase as more consents are given, and so it would be useful to understand and address these at a regional or national level.

4.23 Others found it difficult to comment as they had been unable to identify any specific mitigation measures within the report. This included the Tiree Community Development Trust, which felt that there were only general references to measures. The SFF found the question confusing, referencing the Environmental Report that reserves mitigation to the project level.

4.24 VisitScotland was concerned that the mitigation measures do not address tourism impact. It suggested that measures should be developed taking into account local opinion, visitor views, numbers of people visiting landscapes and seascapes and designations. It felt that decommissioning and reversibility arguments were irrelevant, if the installations have a 50 year life.

4.25 Fishing interests were sceptical about the effectiveness of mitigation to address seascapes effects, and were concerned that changes to the spacing and configuration of turbines could have negative or positive effects on fishing. The NFFO asked that these ‘knock on’ effects be taken into account as mitigation is developed.

4.26 Some consultees suggested that mitigation should take lessons from existing developments. One person pointed out that one of the most effective ways of addressing concerns about blight and public perceptions of negative effects would be to deliver the first few developments without generating adverse publicity.

4.27 Scottish Environment LINK provided detailed discussion of the Section within the Environmental Report focusing on mitigation. It felt that the measures identified were very vague, and suggested amending the Plan to provide further detail. Specific examples were provided, such as shutting down turbines on migratory routes. They also expressed serious concerns about the effectiveness of the identified measures, noting that there should only be reliance on measures which have been proven. However, the commitment to removing options on the basis of HRA findings as necessary and the commitment to continuing stakeholder liaison were welcomed. LINK confirmed it would be happy to continue communications with the Scottish Government and others to help avoid or minimise the environmental effects of the Plan.
Question 11. Do you have any other views on the findings of the SEA? Do you think that all the environmental effects (positive and negative) have been identified? Are there other issues that we should be taking into account in the preparation of the Draft Plan?

General Views on the SEA Findings

Sufficient information at this scale

4.28 Many of the respondents’ views on the overall or specific findings from the SEA process formed an integral part of more detailed views on the spatial options, as described in detail in Section 3. However, a good proportion provided views on the assessment as a whole, in response to this specific question.

4.29 The Highland Council felt that the main environmental effects had been identified, but were unsure about how comprehensive the assessment was. They felt that future environmental assessments should be informed by experiences gained in implementing short term projects. Similarly, VisitScotland noted that more environmental and other effects will become apparent at the project stage. Several other consultees agreed that some of the early developments will provide important information for subsequent projects.

4.30 Fife Council felt that the assessment was sufficiently detailed, and that there would be opportunities to address outstanding issues within additional assessment work. Similarly, Aberdeen City Council agreed that many effects have been identified, but that there remain many as yet unidentified. As a result, they supported the recommendations for further work to address gaps, uncertainties and identified negative effects.

4.31 Historic Scotland acknowledged that much has been passed to the lower level assessments, given the scale of the Plan. They recommended outlining further thoughts on generic types of monuments requiring further consideration at the subsequent levels of assessment, and commented on specific options, as explained in Section 3. They suggested that fortifications, duns, brochs, lighthouses, ecclesiastical sites, chambered cairns, castles and A listed structures would be particularly sensitive to this type of development, requiring further information in lower level assessments. Others felt that cultural heritage could be assessed in more detail, to take into account sacred sights and culturally important views.

Significant gaps

4.32 However, Dumfries and Galloway felt that there were significant information gaps, including on vessel movements, impacts on tourism and economic benefits. As a result, they felt that the SEA does not currently provide sufficient information to justify agreement of the short term options in principle. They recommended undertaking further, more detailed work, and contended that this could lead to a different conclusion. This view was supported by a number of individual respondents, some of whom felt that there had been insufficient long term study and that the Plan was being progressed too rapidly, without the benefit of a strong or comprehensive evidence base.
4.33 A similar view came from industry, although for different reasons. Scottish Renewables felt that it was inappropriate for the assessment to have referred to specific projects, and that its attempt to cover EIA level issues was unhelpful, as a greater level of detail was required. They agreed with the general scope of the impacts, but felt that restricting the material assets component of the assessment was a major shortcoming.

4.34 SeaEnergy Renewables felt that further explanation of the impact assessment methodology would be welcomed. They were concerned that the assessment criteria had been inconsistently applied within the assessment. They also asked for further explanation of some of the comments in Table 9.1 of the Environmental Report that sets out requirements for further work and for an explanation of how transboundary effects had been assessed.

4.35 SSE Renewables raised some presentational issues including the use of colours to illustrate different impacts in Table 8.1 of the Environmental Report. They also felt that the assessment should not assume that measures such as cable sharing would be feasible. They were concerned that fishing, military activities and aviation appeared to not have been properly considered under the heading of material assets, and asked for an explanation of why this had been the case (see below). Otherwise, they generally agreed with the scope of the impacts.

4.36 Some consultees asked that the assessment looks more widely to its broader context. For example, the RSPB felt that developments outside Scottish Territorial Waters, including around Northern Ireland, should be taken into account. This view was supported by consultees from Northern Ireland and England. The Northern Ireland Environment Agency suggested broadening of the SEA objective for cultural heritage to take into account sensitivities beyond Scottish Territorial Waters. It also recommended that the post-adoption SEA statement provides an explanation of how the SEA has taken into account the Giants Causeway and Causeway Coast WHS.

4.37 The need for the assessment to use flexible assumptions was noted by some consultees, recognising the fast pace of technological development. The North Berwick Environmental Trust, for example, asked that reference be made to the potential for turbines 150m in height to be referred to, and questioned whether there should be fuller assumptions underpinning the assessment that consider turbine size, design, numbers of blades and colours.

**Requirement for Socio-Economic Assessment**

4.38 Many of the people and organisations who responded to this question emphasised the need for further assessment of socio-economic effects to inform the Plan.

4.39 Respondents asked about the extent to which land and communities have been taken into account. Several respondents from Tiree, including individuals and the Tiree Community Development Trust, reiterated concerns detailed in Section 3 that there had been insufficient coverage of impacts on communities including their infrastructure, living environment and culture. Even people from further afield noted
the distinct and special character of these unique communities, and expressed concerns that this could be adversely affected by development.

4.40 Others specifically requested more robust economic evaluation of the proposals. The Village at Machrihanish Dunes / Kintyre Development Company Limited felt that more detailed cost-benefit analysis was required, involving relevant interests and being independent in character.

4.41 The RYA Scotland asked for the assessment to be broadened to take into account the contribution which boating and sailing tourism makes to the economy (around £300 million). It was proposed that the socio-economic assessment should take into account future use of harbours, ports and slipways and consult with local users to identify gains and losses. Integrated Coastal Zone Management Plan for Loch Fyne was raised as an example of how shared use of areas by recreation and aquaculture could be achieved. The RYAS emphasised the need for the assessment to recognise that the west of Scotland is an internationally important yachting destination. It also noted the need to take into account impacts on surfing at Tiree. The Scottish Boating Alliance felt that most issues had been identified, but supported the views of the RYAS that further emphasis on the socio-economic benefits of recreational boating, including income and employment in remote areas, should be considered. Used of harbours, ports and slipways was also a key concern.

4.42 The Scottish Canoe Association raised potential impacts of development on sea kayaking and surf kayaking, with particular concerns about safety issues. Visual impact was also a concern, and impacts on surf beaches. They felt that landfall infrastructure should be covered more fully. Whilst generally supportive of the SEA overall, they were keen to have continued involvement in the next stages of the work.

4.43 Taking forward an issue raised by some industry representatives, The Scottish Fishermen’s Federation stated that fishing should have been assessed as part of the SEA. The Small Isles and Mull Inshore Fisheries Group objected to fishing being labelled as an environmental problem, noting that it can be sustainable when competently managed. They felt that the options demonstrated a lack of sufficient consideration of fishing issues and disagreed with the conclusion of the assessment that exclusion zones would preserve fish populations. They noted that whilst some benefits may arise from removal of trawling activity for biodiversity and cultural heritage, it was important to note that other areas are likely to receive additional pressure as a result of displaced efforts.

4.44 The NFFO referred to their response to earlier questions on mapping information and concluded that the identified gaps meant that fisheries issues could not all have been covered in the assessment. They emphasised that the Irish Sea is naturally constrained by topography and was therefore likely to suffer disproportionate effects. The effects on fishing in the south west were also expected to be increased by the irregular coastline and restricted distribution of seabed habitats in the area. They expressed concern that multiple rounds of wind energy development, proposals for marine conservation zones and Marine Protected Areas, and proposals to limit fishing by the Isle of Man would all have cumulative effects on
fishing in the Irish Sea at a time when the fleet is already under pressure. They explained that focusing only on current and recent fishing activity would fail to capture the importance of these grounds and the associated issues.

Further Environmental Effects

4.45 Scottish Environment LINK provided an extremely lengthy response that detailed numerous environmental issues requiring further consideration. They expressed disappointment that they had not been engaged during the development of the Plan and noted the contribution which could be made by the Marine Strategic Studies Forum to the process. They also called for further detail on the environmental effects of development to be better framed within the context of relevant legislation, including the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010. Reference was also made to the requirement for good environmental status to be met by 2020 and set out the descriptors for this of relevance to the Plan and SEA.

4.46 LINK helpfully provided a summary of their views on potential effects. This very detailed information provided clarification of effects not covered in the SEA (carbon fixation by marine ecosystems), corrected some specific information on detailed environmental baseline characteristics, and highlighted areas where more research is required. Key messages included the need to recognise the forthcoming designation of Marine Protected Areas.

4.47 The RSPB provided a detailed response, that highlighted a number of further biodiversity related issues. They felt that collision risk arising for migratory and passage birds should be more fully addressed, taking into account the common factor of low visibility at sea. Further baseline characteristics were also described including Marine Protected Areas, proposed marine foraging SPAs and further reference to existing environmental problems. This included massive reductions in biomass of plankton in the North Atlantic, which has consequences for fish, birds and cetaceans. Details were provided on knowledge gaps. Coverage of the network of Important Bird Areas (IBAs) was welcomed.

4.48 The RSPB also noted that the benefits identified in the assessment needed further qualification. Climate change benefits are likely to arise in the very long term, and it was suggested that they should be removed as they cannot be assumed. Similarly, they felt that habitat creation may not necessarily take place. Perhaps most fundamentally, the RSPB asked for clarification on how the precautionary principle has been applied in the assessment.

4.49 Other environmental effects were raised by consultees, for further consideration:

- Munitions were repeatedly raised as an issue requiring further consideration, reflecting health and safety concerns and taking into account associated pollution.
- Shadow flicker and associated health effects. Comments were made about the sun being low in winter, and bright sunsets in summer.
Coal extraction, mining, tunnels and subsidence were specifically raised in relation to the Kintyre site. Also with regard to stability of structures, some suggested further coverage of geological fault lines and the likelihood of seismic activity.

• Noise. References were made to a report generated from the experience of wind farm in Newquay, suggesting a 1.5km buffer between wind farm developments and homes. Argyll Renewable Communities (ARC) also asked that current evidence on noise effects were incorporated into the assessment.

• Overall need for and impacts of the scale of development proposed. For example, one consultee asked why Scotland should be subsidising other nation’s inability to generate energy from renewables.

• Project specific visual impacts. Some consultees were particularly concerned that they had not had sight of photomontages for specific schemes – notably Tiree residents who expressed significant concerns about the impact of the Argyll Array. They felt that comparisons with smaller scale, lower density developments were not relevant.

• Bats. This was viewed as a serious omission given international status. One consultee stated that curtailment periods should be a requirement to mitigate mortality risk, and noted that this is being tested in other countries and could be achieved at a low cost.

• As with responses to other questions, the wind industry representatives felt that the assessment should be more regionally focused than site specific.

• Effects on wading birds and migratory birds could be covered more fully.

• Some people felt that technical aspects required further explanation, addressing issues such as energy efficiency, the cost of power, origins of employments, and implications for the national grid. Other asked for further information on the project lifespan and overall carbon footprint.

• NERL stated that radar, voice communications and navigational aids should be addressed within the assessment.

4.50 Onshore impacts, including power lines and transfer stations, were also raised as a key issue requiring further consideration. IEEM felt that it would have been useful for the assessment to identify the grid connections proposed for short term options, given that cable routing may impact on benthic and shoreline ecology. Argyll and Bute Council sought greater coverage of cumulative effects of on and offshore developments, particularly where developments are close to shore. Many others, focusing on issues in the South West, noted that cumulative effects of on and offshore developments, should take into account developments at all scales, ranging from large on shore wind farm developments to small scale installations on farms.

4.51 The Northern Ireland DETI pointed out that the Environmental Report does not go as far as considering the cumulative effect of the Plan with other developments proposed throughout the UK. This was tackled in the Northern Ireland Offshore Renewables Report, and mitigation identified included liaison between relevant devolved and UK administration and the Republic of Ireland. They would welcome further discussion of the matter.

4.52 Natural England expressed concern that environmental assets in England could be impacted by developments in Scottish Territorial Waters. Concern was expressed that this had not been adequately assessed in the SEA, and stated that it
must be considered further as the Plan is implemented from the short through to the long term.

**Comments on Requirements for further Assessment, Research and Liaison**

4.53 Some comments were made about the objectives and priorities for further research. IEEM suggested that a more detailed and firmer commitment should be made to this work, with Marine Scotland championing this process. They also recommended collaboration between the Scottish Government and DECC to address key gaps, and felt that a roadmap should be developed to guide the process. Scottish Environment LINK also raised major points in relation to the need for further information gathering to be undertaken to provide a sound evidence base and address known gaps. A long, but not finite, list of research priorities was provided in the LINK response.

4.54 SEPA welcomed the recognition within the assessment of a need for robust monitoring to be undertaken throughout and after the construction process.

4.55 Comhairle nan Eilean Siar noted a dearth of data about the marine environment in their region, and that further work is required in advance of marine renewables development. In particular, they were concerned about availability of information on the occurrence of marine mammals and the possible impact of turbines on them, including acoustic issues. They felt that this work could be undertaken locally, providing further local benefits from the industry.

4.56 The RYA supplied its position paper on minimising the impacts of marine renewables on recreational sailors, and suggested this should be built into mitigation of the developments.

**Habitats Regulations Appraisal (HRA)**

4.57 The RSPB felt that the treatment of Natura sites in the assessment was confused and noted that this must be addressed in the HRA. Further information on the HRA was also requested and it was recommended that issues raised in the assessment, including additional survey requirements should be prioritised and fast tracked. The need to renew surveys for offshore seabirds and cetaceans was noted, and the RSPB noted that it was important that developer data collection was properly targeted.

4.58 Similarly, Scottish Renewables felt that it was regrettable that no HRA had been prepared alongside the draft Plan, and offered to provide advice on this part of the process. Scottish Environment LINK shared this view and noted that the HRA should consider effects on important seabed habitats i.e. those identified as Priority Marine Features, and noted that the areas of focus suggested in the Plan were not viewed as a comprehensive list.

4.59 The robustness of the HRA was a key concern shared by industry representatives and others including Highlands and Islands Enterprise. SSE Renewables emphasised the critical importance of the HRA and asked that it be progressed as soon as possible, suggested that a staged approach would accelerate
the process. They were concerned that options may be removed from the Plan on the basis of the HRA and asked to be engaged at this stage.

4.60 The following two diagrams summarise the key issues raised in relation to Questions 10 and 11 in turn.
Figure 15: Mapping of Views on Landscape, Seascape and Visual Effects

- Wildness
- Recreational enjoyment
- Cultural Heritage / Setting
- Community perspectives
- Cumulative effects
- Proximity to shore
- Solway
- West
- Forth
- Northern Ireland

Landscape, Seascape and Visual Effects

Mitigation

- Remove options
- Positioning of turbines within boundaries
- Scheduling of development
- Further engagement
- Community views
- Visitor perceptions
- Prejudging EIA
- Further detail at project level
- Greater emphasis on strategic measures
- Too vague
- Level of detail
- Indirect effects on fishing

Analysis of Consultation Responses
Figure 16: Mapping of Views on SEA Findings

- Role of Marine Scotland
- Monitoring
- Involvement / economic opportunities
- Target developer surveys
- Appropriate level of detail at this scale and stage
- Outstanding issues cannot be addressed at project level
- Addressing EIA issues is unhelpful
- Transparancy
- Assumptions
- Further environmental effects
- Further research and liaison

Comprehensiveness of the assessment

- Social-Economic Assessment required
- Distribution of options
- Approach to exclusions
- Displacement of activity
- Fishing assessment
- Tourism
- Sailing, windsurfing, boating

- Communities
- Culture
- Infrastructure
- Onshore activities
- Living environment
- Economy

- Munitions
- Radar
- Material assets
- Marine planning context
- Beyond STW

- Significant gaps
- Further research and liaison

- Habitats Regulations Appraisal

- Further evidence on benefits required
- Further evidence on costs required
- Distribution of options
- Advice on key elements
- Critically important - must be robust
5. **COMMENTS ON THE OVERALL APPROACH WITHIN THE PLAN**

5.1 This Section of the report sets out views on the overall approach within the Plan. If focuses on four key questions:

- Question 6, which asked for ideas on how the Plan could be improved,
- Question 7, which invited opinions on the scale and pace of development,
- Question 8, asking for views on the balance between social, economic and environmental issues in the Plan, and
- Question 9 which focused on the proposal of a 2 year review period for the Plan.

5.2 The responses to each of these questions is explored in turn.

##### Question 6: How can the Draft Plan be improved? What should be taken forward differently and why?

5.3 Overall, some respondents felt that the Plan needs to be improved before being adopted, whilst others felt that it could be left to the review stage. Many acknowledged that the Draft Plan was the starting point in a longer term process of planning and environmental assessment.

**Regional versus site specific approach**

5.4 As noted in earlier sections, many of the industry responses focused on the level of detail and criticised the project specific approach. The majority of industry respondents felt that the focus on options had blurred the boundary between consideration of environmental issues within SEA and EIA and recommended a higher level or more regionally focused approach. Scottish Renewables suggested that the approach taken incongruous with its national coverage. They felt that this had caused confusion amongst consultees, as was apparent during consultation workshops in some areas. They argued strongly that detailed assessment and mitigation was more appropriately dealt with at the project level, by developers. They expressed concern that the findings of the SEA could conflict with the EIA process, with potentially onerous implications for developers.

5.5 Scottish Renewables also suggested that the Plan would benefit from further detail on how additional data will be gathered, including timing, responsibility for actions and resourcing. This view was shared by others, such as Highland Council which suggested an additional section on implementation that sets out the role of Marine Scotland and partner organisations. The Crown Estate considered it was willing to work with the Scottish Government to agree areas of responsibility, identify additional action and leads.

5.6 These broad industry views were supported by groups of developers and individual industry responses. The Forth and Tay Wind Developers Group felt that uncertainty at this stage could lead to incorrect or misleading conclusions. Scottish Power Renewables felt that the focus on short term options was too narrow. Other
developers felt that the Plan should be more flexible to allow projects to be taken forward in areas lying outside those identified as options. Future Electric argued that other areas may prove to be suitable as a result of more detailed information, and their exclusion from the Plan may unnecessarily blight their development.

5.7 SSE Renewables felt that being clearer about uncertainties at this stage would go some way towards addressing concerns. In particular, it was suggested that there should be transparency about disparities between the availability of data on different receptors. As with other consultees, they suggested that regional options would have been better, or consideration of alternatives that better reflect a high level strategy.

Timescales and phasing

5.8 It was also suggested that the timescales were rather arbitrary, and could hinder development – again relating to the view that the Plan may be too prescriptive given the uncertainties that remain. Whilst Comhairle nan Eilean Siar considered the Plan to be scientifically robust, having considered all of the main constraints, it also was critical of the timescales, noting that projects being progressed at present are already developing options for 2020 and beyond. As a result, the Council considered the Plan to be lagging, and potentially a barrier to development of the industry at optimum speed. The Crown Estate also questioned the timescales used within the Plan, suggesting that the assumption that all developments would progress concurrently could lead to an unnecessarily pessimistic view of environmental impacts. It suggested clarification the status of medium and long term options and decoupling of these staged deom specific timescales.

Links with Onshore Developments, Assessment and Planning

5.9 Some responses suggested covering the grid, infrastructure, other renewables and landfall aspects of the developments in more detail to give a fuller view of the likely development implications. The Highland Council felt that this would assist with planning on land and for the coast. Argyll and Bute Council also called for further consideration of onshore infrastructure and servicing requirements, and recommended that this is considered in social and economic terms to better inform both the SEA and Plan.

5.10 SNH advised that grid connection works should be addressed within the Plan and SEA, and consideration should be given within this to zones 1 and 2 and round 3 and other marine renewables activities that will require connection. It recommended assessing this based on a ‘worst case’ scenario.

Transparency

5.11 Some consultees called for greater transparency, including being clearer about uncertainties that remain, or making scoring and weighting used in the assessment. This included, for example, Dumfries and Galloway Council which felt that the maps could better presented and that there would benefit from a more reasoned argument focusing on how the options were arrived at.
5.12 Visitscotland also felt that the SEA scoring and weighting was difficult to understand, and suggested that the best approach would be to take developments with least impact to the project stage, to allow stakeholders a further opportunity to influence their final shape.

5.13 In terms of presentation generally, Fife Council felt that the wording in the Plan should be reduced, and that more graphics would improve its legibility. Highlands and Islands Enterprise felt that some of the mapping was unclear, including the layering of information in some figures, and classification used in specific Tables.

5.14 Some comments related to the clarity of specific datasets. NERL asked for clarification as to how radar impacts were calculated, contending that referencing and mapping sources and interpretation were unclear with regard to this issue. They suggested that this issue needs to be assessed on a case by case basis and that caution should be applied in using generally published information.

5.15 One consultee felt that an Executive Summary for the Plan would be useful, but also acknowledged that its preparation may be challenging.

Improving the Plan through further Engagement

5.16 Several respondents, particularly individuals and communities but also the fishing and shipping sectors, called for further consultation and active engagement. Numerous individual consultees felt that the best way of improving the Plan would be to listen to the views of local communities. For some, this reflected broader dissatisfaction with the consultation to date, whilst others were simply recognising that this is just the beginning of a longer term process.

5.17 Some consultees, particularly those focusing on Tiree and the Argyll Array, emphasised the particular importance of further consultation with the ‘proximate community’ at every stage in the process, underlining the need to engage those who would be primarily affected by development proposals, over broader interests. Based on the views of others, this principle would be equally applicable to other areas, specifically communities close to the short term options. It was emphasised that local people had better knowledge of their community and environment, and that this should feed into the process.

5.18 Scottish Environment LINK expressed disappointment that they had not previously been engaged in the process, but offered further liaison and communication as the Plan is further refined and implemented.

Further Socio-Economic Analysis

5.19 Partly linking with responses to some of the previous Questions, in particular Question 2, some respondents noted a need for further socio-economic information to better inform the Plan. This was particularly the case for additional social and economic information, data on shipping and fishing.
5.20 The Scottish Fishermen’s Federation again suggested that fishing should have been considered more fully under the heading of material assets. They contended that this should have been undertaken before conclusions were drawn on the short term options. They considered the work on fishing to date to have been superficial. They felt that the Plan reflected a strong presumption in favour of this type of development, and suggested that the only way the sector could overcome this was to concentrate activity to the extent that it would be difficult for them to be displaced. The NFFO felt that the Plan would be improved once further work was undertaken on the spatial sensitivities of the fishing industry. The WOFFMG that a more focused approach should be informed by fuller consultation with marine stakeholders.

5.21 The Galloway Static Gear Fisherman’s Association, like the wind industry consultees, felt that the Plan would benefit from a more regional focus, to allow better consideration of cumulative effects. They also felt that there was too great a division between consideration of on and offshore development, and suggested that experiences from Robin Rigg pointed to very limited economic benefit resulting from this type of development.

5.22 The Small Isles and Mull Inshore Fisheries Group asked for further consideration of cumulative effects on fisheries from a Scottish and UK wide perspective, as consideration of these issues in isolation was not effective. It emphasised the potentially far reaching consequences of loss of fisheries, and suggested that all potential exclusions should be viewed together, over the medium term to fully define the impacts of the Plan on the fishing fleet. They also explained that it was important to consider cabling, given its potential for cumulative effects on fishing, and were concerned about fragmented consideration of this in relation other development elements, given the nature of the consenting process.

5.23 These fishing industry views were supported by a number of individual respondents. One suggested that the consultation should extent to all registered fishermen, who should be given details of exclusion areas, and information on compensation. Comhairle nan Eilean Siar also noted that the needs of marine users such as the fishing sector would need to be addressed through more detailed, site specific consultation.

5.24 Some consultees also felt that the Plan would be strengthened through additional consideration of shipping and navigation issues. The Maritime and Coastguard Agency referred to their response to Question 1, setting out the need for a full maritime risk assessment of the Plan.

5.25 Other views on additional socio-economic issues to be covered in the assessment raised in response to Question 11 in particular, were also referenced by some consultees in response to Question 8. For example, the Argyll Renewables Communities recognised that the SEA has formed an integral part of developing the Plan, but were concerned that socio-economic considerations have been considered less. They felt this could be developed further under the SEA heading of ‘population and health’ and that appropriate consultees should be engaged to comment on the issues more fully (such as the NHS). They noted that, if the precautionary principle was applied to the Plan, the socio-economic assessment would have a much greater
influence on the Plan. The need to consider the implications of the procurement stage within this was also emphasised. Further detail to steer the socio-economic assessment was helpfully provided.

5.26 The Scottish Boating Alliance welcomed the clear commitments within the Plan to further work with the shipping and fishing sectors, but also emphasised the need for further work on marine tourism and recreation boating activities. The Moray Firth Partnership recommended making reference to up to date economic research establishing the value of the Moray Firth Dolphins for tourism.

Consideration of Offshore Wind in its Broader Context

5.27 Numerous views on the Plan asked that for fuller consideration of offshore wind energy in its broader context. This included proposals for a proper cost-benefit analysis of offshore wind technology, linking with comments on the socio-economic assessment.

5.28 Reflecting an issue raised in responses to Question 11, some people suggested that the Plan would benefit from being better linked with approaches to marine renewables being taken forward by other parts of the UK. Many consultees felt that consideration of offshore wind in relation to other sources of energy, most specifically wave and tidal, would strengthen the plan as a whole. Several specifically referred to opportunities for large scale tidal energy generation in the Solway, noting also that this could exacerbate the cumulative effects of the short term proposals for wind in the area. Other areas with tidal potential mentioned included the area between Kintyre and Rathlin. Some suggested that wave and tidal energy would be sufficient to meet demand, and others called for a more coherent strategy for all renewables, extending beyond the Plan’s focus on offshore wind. Cost-benefit analysis was suggested as a tool for analysing and communicating this. Dumfries and Galloway Council asserted that tidal and barrage options would generate more consistent electricity and therefore be more sustainable, and was concerned that the focus on offshore wind could prejudice this type of development. Argyll and Bute Council also felt that consideration of these options would provide a more complete picture of energy needs.

5.29 Others asked for reassurance of clarification that offshore wind would be beneficial overall, taking into account issues such as the need for standby power requirements. Many of these consultees doubted the effectiveness of offshore wind as a sustainable and effective energy solution. Some felt that more input was needed from stakeholders such as the National Grid, electricity supply companies, wind turbine suppliers and offshore contractors to more fully assess the Plan and better match supply and demand. One consultee suggested that the Scottish Government should work with these interests to develop a staged approach to construction that better matches development with equipment and contractors.

5.30 The Moray Firth Partnership again reiterated a need for targets for overall energy production from offshore renewables to be set to form a better context for the Plan. It was concerned about progressing the medium term options in particular, without having established their necessity in meeting such targets. Clarification of
the estimated operational generation capacity of developments as opposed to maximum designed generation capacity levels was sought.

5.31 Marine planning was again raised, with consultees such as the Kintyre Offshore Wind Farm Action Group contending that it would be premature to agree the Draft Plan before marine planning regulatory requirements are in place. They also pointed out that Marine Protected Areas have not yet been agreed, and that there was therefore a risk that the developments within the Plan could overlap with them.

Reinforcement of Regional and Spatial Issues

5.32 In response to this question, several consultees restated their specific objections to individual developments, or to the broader scale of development within a particular region. Inclusion of some sites, particularly Wigtown Bay in the plan was considered a key failing and it was again suggested that the project was either removed or pushed into the medium term. Some of these consultees felt the Plan was lacking broader, multi-sectoral regional analysis that linked environment with socio-economic issues. Again, potential for cumulative effects, particularly in the Solway, were raised as a concern and considered to undermine the credibility of the Plan as a whole.

Habitats Regulations Appraisal

5.33 Scottish Natural Heritage noted the need for an HRA of the two proposed phases of development. It also stressed the need to take into account planned and emerging research in order to fill current gaps in data. The Dutch Government suggested that the HRA should be thought through in more detail, with more specific reference to the species and habitats covered by the Directive that need to be included in the assessment.

Prioritisation of Options

5.34 Aberdeen City Council felt that it would be beneficial to prioritise the medium term sites through the evaluation system. This was expected to provide a clear structure for implementing this phase of development. This echoed a number of responses to other questions within the consultation, that asked for fuller comparison of the alternatives to inform the final Plan content. Responses to Question 12 also picked up on this issue.

5.35 One individual suggested that the Plan should be revised to exclude short term schemes with low returns and high adverse effects, in favour of prioritising medium term options with scope for higher returns.

5.36 These issues are summarised in Figure 17.
Figure 17: Mapping of Views on Scope to Improve the Plan

- Set within context
  - Wave and tidal
  - Marine planning
  - Efficiency of offshore wind
  - Development feasibility - supply chain, contractors etc
  - Targets?
  - Lead, not follow technology
  - Address the grid
  - Link with onshore development

- Prioritise Options
- More regional approach
  - Present / mapping
  - Communities
  - Stakeholder organisations
  - Consultation
  - Option selection
  - Clarify methods
  - Executive Summary

- Socio-Economic Analysis
  - Fishing
  - Shipping and navigation
  - Communities
  - Tourism
  - Economy
  - Cost-benefit analysis

- More transparency
- Undertake HRA
  - Lead, not follow technology
Question 7: Do you have views on the scale and pace of development that could be sustainably accommodated in Scottish Territorial Waters, taking into account the findings from the SEA and the technical assessment?

5.37 This Question aimed to establish views on the overall level of development and the proposed timescales.

Concern about the proposed pace and scale of development

5.38 In response to this question, several consultees felt that the plan being progressed at too rapid a pace. This included those opposing specific schemes (some comments related to specific proposals notably Kintyre as opposed to the Plan as a whole), and also the fishing and shipping sectors.

5.39 Dumfries and Galloway Council had some serious concerns about the scale and pace of development that could be accommodated in territorial waters, taking into account information gaps and potential impacts. They felt that these issues needed to be addressed before the Plan is finalised.

5.40 Fishing groups also commented on this. The NFFO had concerns about the proposed pace of development, based on the potential for cumulative effects of some significance when the Plan was considered together with other energy infrastructure developments. As a result, they suggested more conscious pacing of development, progressing stages to ensure mitigation can be built in. They also questioned whether targets for development were appropriate and noted that inshore waters should be viewed in the context of the wider UK territorial sea area, to take on board the greater likelihood of conflict arising from areas with multiple users.

5.41 The Small Isles and Mull Inshore Fisheries Group felt that the scale of development could not be understood unless the Plan was set within a broader context of national targets for energy outputs. It also noted that the scale and capacity of developments will change as technology improves. However, it felt that the scale of development currently proposed could not be accommodated by the fishing industry over the medium term, but that scope for deferring or dismissing proposals within the Plan was unclear. At a practical level, by way of mitigation the group suggested that construction should be co-ordinated to take into account and manage temporary exclusions, and recommended that this needed to be done at a national level, and not deferred to the project scale.

5.42 Some consultees suggested that there was a need to build in more time to allow for proper study of all the issues arising from development. For example, the prospective developers of the Machrihanish Dunes project suggested that there was a need for fuller consideration of alternative technologies that may become available within the overall timescale for the Plan. The need to remain flexible to allow for obsolete projects to be abandoned was emphasised.

5.43 Scottish Environment Link, supported by a number of individual stakeholders with an interest in the environment, urged caution and asked for further consideration of the biodiversity and landscape effects of development off the west and northern
coasts. IEEM noted that the scale and pace of change was largely dependent on the outcome of the HRA process.

5.44 Others felt that pace was less important than scale of development. An individual suggested that this was ‘extreme’, raising particular concerns about continuous wind farm development along the Solway Coast. It was suggested that further development in this area should be postponed until at least 2020. Others, such as the Scottish Boating Alliance also suggested that pace was less important than the suitability of the environment to accommodate development.

Concerns about delays

5.45 In contrast, other consultees contended that the scale and pace of change proposed by the Plan was lacking in ambition. For example, Future Electric raised concerns that the timescales were too rigid and that spatially, the Plan did not make provision for development outside option areas. This was viewed as giving a negative message to the industry.

5.46 Comhairle nan Eilean Siar also felt that the scale and pace of the Plan was too limiting, noting that international developers are already challenging it parameters by advancing technology. They asked that the Plan is revised to send out clearer investment signals to developers, getting to a position where technology and development of the grid follows the Plan, as opposed to vice versa.

5.47 SSE Renewables felt that wholesale redefinition of the options at this stage would incur delays, suggesting instead that the references to specific projects within the Plan were replaced with broader analysis. They were also concerned that changes to licensing, the Habitats Regulations Appraisal and marine spatial planning could slow down the process, but acknowledged that the streamlining of consenting regimes may reduce this to an extent.

5.48 Aberdeen City Council stated that the scale of the opportunity necessitated rapid action. They felt that it was essential that this must be balanced with issues such as mitigation and information gathering, to ensure the Plan was sustainable.

5.49 NERL called for more time to allow wind farm developers to undertaken proper consultation on radar issues. It was emphasised that this can take many months, and should therefore be taken into account when considering implementation timescales. Early engagement was recommended as a result.

Learning from experience as it emerges

5.50 Several consultees noted that progress can be reviewed when the Plan as a whole is revisited. Scottish Natural Heritage recognised that it is in the interest of timely development to focus on areas of lowest risk first, but also noted that further work is required to be able to identify such areas. It advised caution in proceeding on the basis of ‘poor data’ at this stage and urged close working with stakeholders and ongoing monitoring and research programmes to minimise uncertainty in planning and consenting. SNH noted that to an extent pace will be dictated by the experience of developing the short term sites, and that this experience should be
reflected in the planning of further sites. The need to ensure grid transmission capability was also noted, although it was recognised that this falls beyond the scope of this Plan and its SEA.

5.51 The RYA Scotland suggested that there was a need for a mechanism to facilitate sharing of experience between offshore wind farms, such as the role of EMEC for wave and tidal energy.

5.52 Similarly, The Highland Council felt that the pace of change was broadly correct, but that lessons may be learned from the further development of technology and implementation of the short term sites. As a result, it was suggested that the scale and pace of the Plan may be adjusted within future reviews, to ensure that the sector develops in a sustainable way. Several individual consultees asked for further evaluation of Robin Rigg to be undertaken, before further development is progressed.

5.53 Whilst the Scottish Fishermen’s Federation had significant reservations about the Plan overall, they also suggested that a sequential approach may help to ensure that lessons can be learned from one development, before the next one proceeds.

5.54 Monitoring more generally was raised as a key mechanism that would facilitate the periodic review of the scale and pace of development as more information becomes available. Several respondents suggested that there was a need to align the pace of development with the outcomes on monitoring. Seaenergy Renewables noted that Cowrie had summarised the results of monitoring to date as required by FEPA and recommended that this is taken into account. The Dutch Government expressed particular interest in the monitoring programme, as well as any solutions emerging from the Plan for managing cumulative effects.

5.55 Seaenergy Renewables noted that there were no specific studies exploring capacity, and felt that this could provide a clearer view on whether development is sustainable in the short, medium and long term. As with several other questions, respondents also stated that progress of the Plan in relation to capacity, was difficult to gauge in the absence of the plan being linked with stated targets on energy generation.

5.56 Some industry representatives and others felt the Plan’s timescales appeared to be too rigid and prescriptive. Several consultees suggested greater flexibility.

Linking the implementation of the Plan with other factors

5.57 Several consultees noted that the scale and pace of implementation will depend on a range of other factors. Some felt the grid was a key constraint to development. The Tiree Community Development Trust suggested that the weakness of the grid is a constraint to development, and proposed that Government leadership is required to define the scale of development and therefore schedule grid developments. SSE Renewables noted that the pace of development will be closely linked with support and availability of infrastructure and materials, quayside manufacturing facilities, the availability of vessels and material resources for wind farm construction. This view was also supported by Scottish Renewables, which
emphasised the need to consider competing demands on resources including finance and the supply chain, although taking into account Round 3 projects. Scottish Power Renewables recommended further detailed discussions with developers, industry, the supply chain and others to achieve a joined up approach to phasing of investment.

5.58 Visitscotland also emphasised the importance to planning to take into account supply chain infrastructure. Phasing was recommended as part of this, and it was noted that the onshore implications of development may be substantial, requiring sensitive management of impacts on residents and visitors. Similarly, Scottish Renewables noted the importance of taking into account impacts on other marine users as projects progress.

5.59 Other consultees developed this theme further, for example suggesting that the Plan should be linked with the need for manufacturing and the supply of labour and equipment to come from Scotland, to maximise the economic benefits of development. The need for further links with N-RIP was raised by several consultees including Highlands and Islands Enterprise. This was regarded as a key means of targeting and phasing development in a way which maximises the sector's economic benefits. One consultee suggested that there will be a need for development planning to be prepared to progress associated onshore elements within the Plan's timescales. The Argyll Renewables Communities noted that onshore developments will impact on host communities, and expressed concern that these would be considered after, and separately from, decisions on the offshore elements of the Plan. As a result, they recommended more integrated assessment and decision making.

5.60 Fife Council noted that there will be a need to ensure that skills are available to match the scale and pace of development. They suggested that further support is provided to communities by the Scottish Government, to enable them to capitalise on employment opportunities at a local and regional level.

5.61 These responses are summarised in Figure 18 below:
Figure 18: Mapping of views on the overall scale and pace of development within the Plan
Question 8: Have we got the balance right in the Draft Plan, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts?

5.62 This question aimed to explore views on the overall emphasis and balance within the Plan as a whole. Some consultees asked further questions in response, specifically “benefits for whom?” and “what against what?”. This reflected views that more detailed information is required to judge this.

Balance informed by targets

5.63 Some consultees sought more information on the role of the plan in meeting targets. Seaenergy Renewables, for example, asked how MW capacities for regions would be developed, before commenting on the balance within the Plan.

5.64 Some consultees felt that the Plan was too driven towards meeting what some considered to be ‘arbitrary’ targets, and expressed concern about the consequences of this approach for other marine users or the environment. The Galloway and Upper Nithsdale Liberal Democrats Constituency Party was doubtful that the Plan was appropriately balanced and concerned that it focused too much on offshore wind, and not enough on other contributors to climate change mitigation.

5.65 Others suggested that offshore wind may only be a short term solution, noting that a greater contribution could be secured from other technologies including wave and tidal and nuclear. Several consultees were concerned that the short term sites had been driven by commercial feasibility, and that this heavily outweighed the impacts of developments within the Plan.

5.66 Some went as far as questioning the necessity of development in the first place, with one consultee suggesting that the actions were merely ‘symbolic’. Views on climate change generally were raised by some individuals, who felt that there was insufficient evidence to demonstrate that this type of development would have a net benefit for reducing emissions. One consultee questioned why Scotland was embracing offshore wind when other countries were retreating from it, and was unconvinced about climate change more generally.

Economic issues

5.67 Several consultees felt that a balance had not been struck in terms of concerns about economic impacts. This was particularly the case for tourism and fishing, and communities in more general terms.

5.68 As noted in responses to other Questions (particularly Question 2), these consultees and others called for a detailed socio-economic assessment. This was reinforced by numerous respondents who opposed specific projects, did not respond directly to this question, but expressed significant concerns about visual impacts, impacts on tourism and communities. Some called for more detailed and explicit cost / benefit analysis. Many felt that the losses incurred by the tourism and fishing sectors would not be offset by gains in the renewables industry, particularly at a local scale.
5.69 Individuals felt that their businesses or that the economic viability of their wider local community would be adversely affected by development, suggesting that climate change mitigation was heavily outweighing these concerns. Many of the people responding to this question were focused on the Kintyre proposal, and also raised the conflict between the development and the investment planned for the Machrihanish Dunes project.

5.70 Several respondents who opposed the Wigtown Bay option or development in the Solway more generally were also critical of the broader balance within the Plan and its apparent lack of consideration of tourism and other economic effects. Some felt that the net effect on the local economy of the Wigtown Bay proposal in particular would be ‘devastating.’ These consultees also felt that impacts on tourism and fishing had been underplayed and that, based on the experience with Robin Rigg, losses would not be replaced by growth in the renewables sector locally. Aspirations to generate income from environmental quality, with projects such as Marine National Parks, were expected to be undermined if development proceeded.

5.71 The fishing sector felt that their interests had been overlooked in the drive to meet energy and climate change targets. As a result, the need for compensation was raised. This went beyond concerns about economic losses to also include concerns about the social effects on small rural communities who rely on fishing. The Small Isles and Mull Inshore Fisheries Group felt that the significant burden imposed by the Plan on individual vessels must be acknowledged and addressed, asking for urgent clarification of arrangements for compensation. The NFFO questioned whether the sector was good value, when costs to consumers and tax payers were taken into account. The need to fully recognise effects on commercial fishing was also recognised by other consultees, including Comhairle nan Eilean Sìar. The Dutch Government suggested further consideration of the impacts of the Plan on fishing grounds in the North Sea would be required, perhaps even at an international level.

5.72 Again, many who opposed development of specific projects or in certain regions, questioned the viability of offshore wind in terms of cost, subsidy and financing by taxpayers and consumers. People also asked whether development of this scale was necessary if the energy was to be exported.

5.73 More positively, and in contrast to some of these views, Comhairle nan Eilean Sìar regarded this to be a potentially significant industry for the Western Isles, which could help to reverse problems such as depopulation by creating new types of economic activity. It noted scope for local education providers to develop as centre of excellence, which helps to capitalise on the opportunities within the Plan. As a result, the Council felt that the economic benefits of the Plan may be underplayed, and that the potential for significant local economic benefits should be recognised.

5.74 Highlands and Islands Enterprise also asked for a greater focus on the likely economic benefits of the Plan and exploration of how they will be achieved, referring to the Offshore Wind Industry Group (OWIG) route map as a tool for delivering this. This view was supported by a number of individual respondents. The Argyll Renewables Communities felt that an assessment of the commercial impact of development, and its economic development opportunities, was urgently required so
that communities who may be affected by development can make use of any opportunities arising from the Plan. They also suggested that developer obligations could be used to help communities to develop skills and build capacity to enable them to become participants in the supply chain.

5.75 The Maritime and Coastguard Agency felt that the values of the benefits and costs of the Plan had not yet been provided, and so could not comment on whether the balance was appropriate. However, it noted that marine risk assessment methods included well established costs and values that could be used within further analysis.

5.76 As with its response to Question 7, Scottish Renewables felt that infrastructure links needed to be considered in order to answer this question.

Further consideration of environmental effects

5.77 Some consultees felt that there was insufficient coverage of some aspects of the environment, and called for a precautionary approach in the light of ongoing uncertainties. This included those calling for more weighting to be given to the consideration of landscape impacts, and other environmental constraints including European Protected Species. Reference was made by some consultees to the importance of the precautionary principle, and others felt that the environment should be regarded as an exclusion, rather than a constraint.

5.78 Scottish Environment LINK provided further elaboration on a set of presumptions that would, in their view, help to sustain the precautionary principle:

- Adequate baseline survey and monitoring to identify sensitivities, assess impacts and develop management and mitigation procedures;
- Ensuring that sites / species / features with particular sensitivities are protected.
- Explicit commitment that in these case consent to continue is strictly subject to evidence that there is no significant adverse impact.
- Acknowledgement that this is a risk-based approach which may allow early development, but may equally lead to withdrawal of this and further consents.
- All baseline data are made publicly available, and updated at least annually, so that they can be reviewed and fed into an adaptive management process.
- Close attention to advice of statutory consultees, particularly SNH and JNCC.

5.79 One consultee suggested that a better balance could be struck between development aspirations and their environmental impacts. The idea of ‘anticipatory mitigation or compensation’ was raised, and it was proposed that this could be supported by an industry wide fund to address key losses. This would be a means of achieving strategic level mitigation through partnership working, also involving the Scottish Government given its commitment to green energy.

5.80 Again, those opposing specific developments felt that some of the Plan’s proposals had overridden potential environmental effects. Examples included the contention that the Kintyre proposal had placed insufficient emphasis on landscape and seascape effects. However, others were more relaxed about this, recognising
that the Plan and its SEA make a start on identifying and balancing industry and environmental issues, and that the balance can be reviewed as the implementation progresses.

Social Issues

5.81 As noted in responses to other Questions, the need for fuller socio-economic analysis was again raised, with numerous consultees feeling that the Plan does not strike a good balance between development and community impacts. The Tiree Community Development Trust stated that likely costs of development to communities needed to be more fully established, to ensure that its economic benefits can be recouped, and this view was supported by the Argyll Renewables Communities and Argyll and Bute Council. The Council also raised concerns about the ways in which renewable energy and economic development aims have been greater consideration than wider socio-economic effects, including on established communities. They felt that this view was reinforced by the fact that the 10 short term sites had been identified before the start of the planning process.

5.82 Dumfries and Galloway Council also felt that the lack of an economic and social assessment meant that an appropriate balance had not been struck.

5.83 Scottish Renewables and SSE Renewables felt that the SEA should take into account the potential impacts of climate change on population and health, so that the long term benefits of the Plan are not understated.

5.84 One individual felt that the Plan was weighted towards environmental considerations, with insufficient coverage of the visual effects on local populations.

Good balance

5.85 Some consultees were supportive of the overall balance within the Plan. This included the Highland Council, who noted that the industry remains at an early stage and there will be further time and opportunities to review the broad aspirations as implementation progresses. Also supporting the broad balance within the Plan at this stage, RYA Scotland noted that many impacts will only emerge at the project level, and that this is where mitigation will therefore be required. Fife Council also supported the approach and was of the view that each issue had been addressed in sufficient detail, and given appropriate weighting in the consideration of options. Aberdeen City Council also felt that the balance appeared to be correct, recognising that further assessment will be required to address some of the limitations of the Draft Plan at this stage.

5.86 These views are summarised in Figure 19 below:
Figure 19: Mapping of views on the overall balance within the Plan

- **Balance**
  - Environment outweighed by development
  
- **Social issues need further consideration**
  - Communities
  - More work on population and health
  - Close links with economy
  - Visual perceptions

- **Dependent on targets and technology**
  - Offshore Wind
  - Efficiency
    - Short term option
    - Other technologies preferred
    - Symbolic action
    - Subsidised industry
    - Exporting electricity
    - Development economics

- **Economy requires further assessment**
  - Impacts on tourism
    - Tourism losses not offset by gains
    - Jeopardise investment
    - Compensation required
  - Impact on fishing
  - Socio-economic assessment required
  - Potential economic benefits
  - Cost benefit analysis required
  - Undertake maritime risk assessment
  - Further consideration of infrastructure

- **How can targets be defined?**
  - Arbitrary targets

- **Impacts will only be clearer at project level**
- **Good balance so far...**

- **Further work required**
  - Apply the precautionary principle
  - Anticipatory mitigation required
  - Options should be excluded if unacceptable effects
  - Review balance as plan progresses

- **Environment outweighed by development**

- **Communities**
  - More work on population and health

- **Balance**

- **Social issues need further consideration**

- **Economy requires further assessment**

- **Environment outweighed by development**

- **Balance**
Question 9: The Plan, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often should this be done and why?

5.87 Views on the proposal for a two year review period were wide ranging, with 51 responses in total to this question. Around 18 respondents felt that two years was appropriate, a small number (4) felt it may be too frequent or called for more frequent or even continuous review (6). The remainder provided further discussion or comments.

Uncertainty arising from future reviews

5.88 Several respondents were concerned about uncertainty created by too frequent reviews of the Plan, for a number of different reasons.

5.89 The industry called for clarification on the consenting process during future plan review periods, reflecting concerns about changing levels or support or over prescription of mitigation at the EIA level. Scottish Renewables, asked that developer risk be reduced in relation to project consents and this was supported by several individual developers and regional groupings. To achieve this, Scottish Renewables recommended a statement on the consenting process for short term options during future review periods.

5.90 Highlands and Islands Enterprise suggested that uncertainty could be avoided by ensuring that the consenting bodies continued to consider and determine projects based on the existing version of the Plan, rather than delaying decisions whilst awaiting new versions to be produced.

5.91 The Moray Firth Inshore Fisheries Group was concerned that a two year review period would lead to continuous redefinition of the acceptable impacts on the fishing industry in terms of access to existing sites, and the location of new locations for energy developments. However, it also noted that the layout of wind farms and tower construction will be key changes that the SEA must take into account, recommending that the range of acceptable impacts is considered and evaluated within the two year review.

More flexible review periods

5.92 Several responses suggested a fixed time period was too rigid, and suggested tailoring reviews to the emergence of key monitoring or baseline information, or linking with key development stages. Some felt that it was critical that developments are considered from the outset, rather than later on in the process, and subjected to a process of continuous review.

5.93 Some suggested that short review periods at first could be replaced by growing periods between plan reviews as certainty linked with experience grows. They noted that as knowledge improves, the need for frequent review will reduce. For example, one consultee suggested an initial two year review period to take into account rapid change and growing understanding, followed perhaps by a three year period, and subsequent reviews every four or five years. This view was supported.
by others who recommended an iterative process throughout the implementation stages. Another consultee called for a major review to be undertaken immediately following implementation of the short term options, prior to the medium term options proceeding.

5.94 Some industry representatives concurred with this approach, recognising that the knowledge base is evolving. Seaenergy Renewables suggested coinciding reviews with key milestones in the development of the industry, such as the release of environmental management findings or availability of post consent monitoring information. The view that a more regional approach was again supported, noting that this would be more flexible and remove the need for the Plan to be revised before realising the medium term development options.

5.95 The Village at Machrihanish Dunes / Kintyre Development Company Limited proposed that supplements to the Draft Plan should be released as and when required, on the basis of new information becoming available. They agreed that a comprehensive review every two years would be appropriate.

5.96 IEEM felt that the two year period may be too frequent. They suggested avoiding setting a rigid timetable, and instead reviewing on the basis of information becoming available. They emphasised the role of Marine Scotland in co-ordinating this process, and feeding in emerging information and research findings that address current uncertainties. IEEM also requested clear guidance on how this information will be fed back to the industry and referred to within the regulatory process.

5.97 VisitScotland considered the two year period to be sufficient, but also noted that it should be adjusted to take into account variables such as significant technical breakthrough, the discovery of minerals or natural disasters. However, the Scottish Canoe Association anticipated that there is likely to be change before 2020 that mean that medium term options should be reconsidered.

5.98 The Small Isles and Mull Inshore Fisheries Group felt that the review period would depend on the speed of development that takes place. They supported an approach specifying a minimum time period between reviews, on the basis that technology is developing rapidly and that fishing data will increase significantly in the short term. Based on their view that the Draft Plan does not adequately address fishing issues, they emphasised the importance of proper opportunities to assess the effects of short term options as they are developed, and to use this information to influence the medium term. As a result, they recommended an annual review process to provide sufficient scope for the Plan to respond to changes and additional information.

5.99 Historic Scotland also felt that it would be beneficial to update the Plan as further surveys of submerged archaeology (see Question 2) are taken forward.

**Support for the proposed two year reviews**

5.100 Several consultees felt that 2 years was about right, given the pace of change in the sector and technological progress. RYA Scotland was supportive, but noted that this should not necessarily imply a major revision of the Plan, simply a
check for changes required on the basis of new information becoming available. They also suggested that it the process would be more transparent if these changes were set out in a separate document, and noted that to maintain credibility the Plan needed to be able to respond to any major changes that might arise. The Scottish Boating Alliance supported this view.

5.101 The Scottish Fishermen’s Federation agreed with the two year period and emphasised that this was needed to ensure impacts on material assets were fully understood. This view was also supported by the WOFFMG.

5.102 Aberdeen City Council, Argyll and Bute Council, the Moray Firth Partnership, the Whale and Dolphin Conservation Society, the North Berwick Environmental Trust and the Dutch Government considered the two year review period to be appropriate, allowing further information to be taken on board. Whilst the Argyll Renewables Communities supported the review period, they noted the need for appropriate indicators to be established from the outset to ensure appropriate data collection was undertaken. Highlands and Islands also agreed with the timescale but noted that the Plan should only be reviewed where necessary to avoid problems arising from possible delays incurred.

5.103 Scottish Natural Heritage welcomed the proposed two year review period, but suggested that more regular review of the Plan should be undertaken in the early stages to take account of:

- Marine Spatial Planning (national and regional plans);
- DECC’s Offshore Energy SEA Research Programme;
- Key research findings;
- Lessons learned from the development of short term sites; and
- Other renewables lease rounds e.g. wave and tidal.

5.104 SNH also explained that work is underway which would be beneficial to future iterations of the Plan and its SEA, including development of seascape character assessment guidance in conjunction with Natural England, advice on scoping and weighting of National Scenic Areas, mapping of areas of wild land character, isolated coasts and Areas of greater Landscape Value, and revisiting on the Scott et al (2005) report which identified seascape sensitivity and capacity in order to inform the landscape and visual impact assessment for the study. SNH noted that it had reservations about this methodology and suggested further liaison to discuss the findings of their review as it progresses.

More frequent review required

5.105 A few consultees felt that more frequent review may be appropriate. Comhairle nan Eilean Siar felt that the proposed two year review period was appropriate, but also noted that annual review may also be needed, given the pace of development and the uncertainty around issues such as technology (rapid development of floating turbines), the grid, transmission charges and development incentives.
5.106 Three individuals also felt that an annual review would be more appropriate. One felt this would allow a view to be taken on whether or not offshore wind was becoming obsolete as it is overtaken by wave and tidal development. Another also suggested that better energy options are likely to become available within a relatively short space of time. A further consultee recommended reviewing the Plan ‘as soon as possible’ to ensure that lessons learnt are taken into account before new developments proceed.

**Less frequent review suggested**

5.107 Conversely, some consultees felt that a longer review cycle would be appropriate. The Highland Council argued that a five year review period could fit better with local development plan cycles. They also suggested alignment with the National Marine Plan once adopted, a view also supported by Scottish Renewables who also urged greater links with DECC. In broader terms, the importance of linking into marine spatial planning was strongly promoted by Scottish Environment LINK.

5.108 Fife Council also suggested a five year period, to allow reasonable time for change to take place. The NFFO suggested that the Plan is reviewed as often as practical, taking into account new information, but that the first review could be in the region of three to five years. Infratil felt that a two year period may be over optimistic.

5.109 Scottish Power Renewables also suggested that a 5 year review period would be more suitable, giving more time for the baseline and medium term options to be informed by data that are currently being gathered. It suggested that the technical uncertainties associated with the medium term options necessitated their ongoing review. As a result an iterative approach to development of the Plan was recommended, allowing for new technologies and significant impacts to be taken into account. Following an initial five year review, subsequent reviews could take place every three years. It was noted that the short term projects will not be constructed until 2016 and so reviews every two years ahead of this may not be required. It was explained that preconstruction surveys will be available from 2017 and operational monitoring from 2019, and proposed that these sources link into future reviews.

**Views on the review process and relevant information**

5.110 SSE Renewables asked for further explanation of how data will be collected and managed to allow for sharing between developers. It urged further discussion of this matter, given the potential for reviews to generate significant time and cost constraints. It suggested tabulating ongoing research, so that its implications for environmental assessments and future versions of the Plan could be more clearly seen. Clarification was also sought on when the first review would take place, and at what frequency this would be repeated thereafter. Scottish Power Renewables also asked for a transparent review structure, and clear guidance on how feedback from the process will be fed through to the industry and regulators.

5.111 Dumfries and Galloway Council and a number of consultees with particular interest in development in the South West region, felt that baseline monitoring should be undertaken, making use of information from the Robin Rigg wind farm, before
decisions are made on short term options that are based on currently limited information.

5.112 Several consultees viewed the Plan review as crucial for addressing some of the uncertainties that persist in this iteration of the Plan. The Maritime and Coastguard Agency recommended that the review considers port development, climate change, maritime risk assessment, and civil hydrography in the short and medium term options and their vicinities. It also proposed that developments in the Marine Protected Areas, and wave and tidal energy should be considered and that vessel traffic pattern alterations arising from developments should be fed into predictive models of traffic behaviour for subsequent developments. NERL had no strong view on the frequency of the review period, but noted that they wished to be consulted as part of the process.

5.113 One individual suggested that businesses should prepare annual progress reports, to be submitted to the Scottish Government for annual review.

5.114 Scottish Environment LINK felt that lessons learned from short term sites should be used to inform medium term sites as a matter of urgency. It proposed that the Plan and its SEA should be reviewed as soon as this new data was available.

No Plan – No Review

5.115 Five consultees contended that it was not necessary to consider review period as, in their view, the Plan should not be implemented in the first place. Most of these responses came from people who were strongly opposed to the content of the Draft Plan including specific short term project. Some felt that tidal energy was a preferable option and should be explored further, or at least better linked with the Plan for offshore wind. Others were concerned that a two year review ‘would come too late’ for proposals such as the Wigtown Bay development to be changed. One consultee felt that the proposals for iteration and review were tantamount to retrospective evaluation and viewed this as a ‘reckless’ approach.

5.116 These views are summarised in Figure 20 below.
Figure 20: Mapping of views on the Plan Review Period

- **Review Period**
  - **Review more frequently**
    - Pace of development
    - Uncertainty
    - Grid
    - Annual review
    - Wave and tidal technology is progressing
    - 5 year period to fit with LDPs
    - Align with National Marine Plan
    - Allow time for progress to be made
    - Timing of short term sites and survey findings
    - Takes into account pace of change
    - Be clear about any changes made
    - Ensure fishing is taken into account
    - Establish appropriate indicators
    - Link with marine planning
    - Link with rest of UK
    - Link with wave and tidal
    - Take into account new information and methodologies
  - **Review less frequently**
    - Reviews create uncertainty
    - Availability of information
    - Technical development
    - Initial periods short, lengthening as development progresses
    - Supplementary information not wholesale review
    - Guidance on use of emerging information
    - Depends on development speed
    - Flexibility required
    - Address consenting process
    - Avoid delay
    - Determine projects on basis of existing Plan
    - Link with milestones in development
  - **No development / plan, no review required**
    - Explain data collection
    - When will first review take place?
    - Comprehensive baseline required
    - Fill gaps and address uncertainty
    - Industry responsibility
    - Learn from short term sites
    - Review process

- **2 years is appropriate**

- **Analysis of Consultation Responses**
6. **SUMMARY AND NEXT STEPS**

**Key points**

6.1 This Report has brought together the findings of the consultation in order to provide a clearer view of the main issues raised by stakeholder organisations and the public. The key purpose of the consultation on the draft Plan and its SEA was to encourage wide debate on the overall approach to offshore wind in Scotland. Whilst not all consultees agreed with the approach to the Plan or some of its content, and others had considerable concerns about impacts on specific sectors such as fishing or navigation, the consultation process has ensured that these views have been expressed and can now be taken into account as the Plan is finalised.

6.2 Further work is required to provide a comprehensive summary of all of the issues set out in this report. However, in the interim, the following key issues have emerged as particular priorities of the consultees who engaged in the process.

1. There was a general view across the different types of consultees that the Draft Plan and its SEA provided an important first step in the process of strategically planning offshore wind development in Scotland.

2. However, some concerns were expressed about the scale and pace of change, and the balance that is being struck between environmental, social and economic concerns. Many people called for much more detailed assessment of the positive and negative social and economic implications of the Plan. This work is now in progress.

3. There is extensive and direct regional and local opposition to the Solway, Wigtown and Kintyre sites. Most of these concerns arise from the visual impacts from the developments, their size and proximity to the coast, and their perceived implications for local tourism sectors. There are also some more regional and local level concerns over the proposals for Tiree (Argyll Array) and Islay. In the case of Tiree, concerns relate to the impact on the island’s culture and population, its fragile environment and infrastructure.

4. In contrast, there is support for the draft Plan and its SEA from other regions, including the North and East. In the Western Isles and Orkney, respondents including the local Councils are seeking to progress more development in the short term than is currently proposed in the plan.

5. The fishing industry is concerned over the scale of short (2010-20) and potential medium (2020-30) term development and the related exclusion and displacement the industry will face especially if important spawning, nursery and fishing take zones are impacted. A combination of exclusion and hence increased local competition arising from displaced fishing activity is a concern.

6. The Shipping and Ports and Harbours sectors foresee significant benefits and are aware of the National Renewables Infrastructure Plan (N-RIP). However, there are also concerns over the scale and position of developments off the Forth and Tay and within the Solway, and about large medium term options which have the potential to restrict access to the Minch and therefore require further consideration.
7. The aviation industry is concerned that coastal airports may be affected especially for sites off the Forth and Tay, Tiree and Machrihanish.

8. SNH, some local authorities (Dumfries and Galloway Council and Argyll and Bute Council) the RSPB and Scottish Environment Link have raised concerns about the scale and location of proposed developments and in particular its environmental impacts.

9. The offshore wind energy industry has generally welcomed the draft Plan and its SEA as an important first step in the process. However, it is also suggesting that a regional, rather than site specific, approach would be more appropriate, to ensure that the SEA does not pre-judge environmental matters and mitigation that could be better addressed at a project level.

Next steps

6.3 A Habitats Regulations Appraisal (HRA) is currently underway, with the report due by the end of January 2011. In addition, the socio-economic assessment has now been commissioned, and will report within a similar timeframe. These two studies are of critical importance, and will be considered alongside consultee views on the draft Plan and its SEA.

6.4 All of the views expressed by consultees are being taken into account in finalising the Plan. It is considered important that the dialogue on offshore wind continues over the coming months. As a result, the Scottish Government will be undertaking further consultation events in early 2011 to:

- Provide feedback on the consultation analysis;
- Ensure that its assessment of consultee views is accurate and identify any further issues of relevance to the Plan;
- Explore the approach to finalising the Plan with consultees, to explore and test views on key decisions about its content.

6.5 The final Plan and its accompanying post-adoption SEA statement will be published in March 2011.