
Consultation on the Draft Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters

1.0 SUMMARY

- 1.1 Marine Scotland is currently consulting on the Planning Scotland's Seas consultation which was launched on the 25 July 2013. The consultation was originally a 16 week consultation period however this was extended to allow the Council to consider the matter at the Council meeting on 28 November.
- 1.2 The consultation consists of three different elements:
- Scotland's first National Marine Plan which will provide a single framework to manage all activity in Scottish waters. The purpose of this is to provide clarity to developers and decision makers on Scotland's priorities for sustainable use of the sea.
 - Proposals for a network of new Nature Conservation Marine Protected Areas (MPAs) which if designated would increase protection for Scotland's marine species and habitats
 - Draft sectoral marine plans which the aim of which is to guide the development of a sustainable and successful offshore renewable energy industry in Scotland.
- 1.3 It is the later draft sectoral marine plans for offshore wind, wave and tidal energy in Scottish waters that this paper will consider. The Marine Plan and MPA consultations are before members for their consideration under cover of separate reports.
- 1.4 The Draft Sectoral Marine Plans considers the potential for off shore wind energy, wave and tidal development within Scottish Waters (0-200nm). The Plans represent Scottish Minister's proposed spatial policy at the national and regional level for the development of commercial scale off shore renewable energy in Scottish Waters.
- 1.5 The draft Plans contain 10 proposed options for off shore wind farm sites, 2 of which lie within Argyll and Bute (West region), 10 for tidal, 2 of which lie within Argyll and Bute and 8 for wave energy, 3 of which lie within Argyll and Bute. (See attached map)
- 1.6 Upon receipt of all responses an analysis will be undertaken by Marine Scotland and the Draft Plans will be reviewed and revised as

appropriate. Following this a report will be issued on the consultation process by December and if necessary further assessment and consultation shall take place in light of any significant revisions. Final Draft Plans will be presented to Scottish Ministers to be formally adopted in early 2014. It is proposed that the Plans are monitored and reviewed every two years.

- 1.5 This report considers the key issues relative to the draft Sectoral Marine Plans and associated supporting documents including the Sustainability Appraisal Report, SEA Environmental Report and Socio-economic Report and provides a response to the 18 questions posed within the consultation document.

2.0 RECOMMENDATIONS

2.1 It is recommended that Members:

- (i) Note the content of this report and.
- (ii) Agree to this report forming the basis of the Councils formal response to Marine Scotland, including the response to the 18 questions as detailed at Appendix 1.

3.0 DRAFT SECTORAL MARINE PLANS FOR OFFSHORE WIND, WAVE AND TIDAL ENERGY IN SCOTTISH WATERS

Background

3.1 The Scottish Government consider that Scotland can lead the world in the development and deployment of offshore renewable energy technologies. Scotland's potential is considered to be enormous and that the sectoral marine plans provide an opportunity to consider how we further harness this vast resource, in a sustainable manner, to provide us with the power Scotland requires and to drive our ambition for a low carbon Scottish economy. The Scottish Government has set a range of challenging targets for energy and climate change. These recognise the potential to take advantage of the extensive marine energy resources (wind, wave and tidal power) available in Scottish waters and include meeting at least 30% of total energy demand from renewable sources by 2020, incorporating:

- 100% of electricity demand from renewables (31% by 2011)
- 11% of heat demand from renewables
- 10% of transport fuel from renewables

The draft plans recognise that offshore renewable energy is an integral element in Scotland's contribution towards climate change. Scottish

Ministers consider that the draft sectoral plans will assist in the delivery of Scotland's policies for green energy thereby helping to meet Scotland's carbon reduction targets (42% by 2020, 80% by 2050).

- 3.2 The development of off shore renewables could represent one of the biggest opportunities for sustainable economic growth in Scotland for a generation. The draft plans recognise that ports and harbours present viable locations to service the associated construction and maintenance of activities for offshore renewable energy as is the case with Campbeltown New Quay, one of Scotland key N-RIP sites.
- 3.3 The Draft Sectoral Marine Plans considers the potential for off shore wind energy, wave and tidal development within Scottish Waters. The Draft Plans are being progressed within the broader context of the Draft National Marine Plan for Scotland. The Sectoral Plans are intended to complement both the National and future Regional Marine Plans and are aligned with the process of developing Marine Plans as outlined in the UK Marine Policy Statement. The Plans will provide relevant information and assessment in strategic locations considered by Scottish Ministers as suitable to progress the development of commercial scale offshore renewable energy. In addition the Draft Plans represent an early opportunity to identify key strategic issues and potential mitigation measures to help avoid unnecessary delays at a later stage. This should in turn assist in contributing to the competitiveness of Scotland as a location for off shore renewable energy development and make it clear where development is possible, what the main challenges will be and where future opportunities may be possible.
- 3.4 The Draft Plans Options have been subject to Sustainability Appraisals comprising Strategic Environmental Assessments (SEA), Habitats Regulations Appraisals (HRA) and Socio-Economic Assessments. The outcome of the SEA, draft HRA and socio economic assessment have informed the development of the draft Plans. The SEA is applied to test and comment on the plan options for development from a strategic perspective. The process is applicable to the strategic and regional level issues. The SEA is a mechanism to assist in identifying key environmental receptors, effects and mitigation measures and by providing early indications of key issues that would need to be addressed at the project level.
- 3.5 In regard to the development of offshore renewable energy around Scotland, the Plans form an integral part of the series of initiatives which include:
 - Scotland's Offshore Wind Industry Route Map,
 - Scotland's Marine Energy Action Plan
 - National Renewables Infrastructure Plan(N-RIP), and
 - Securing the Benefits from Scotlands Next Energy Revolution

- 3.6 The Scottish Government has adopted an iterative approach to marine planning for the renewable energy sectors and the development of these new Draft sectoral marine plans build on previous marine spatial plans such as the Blue Seas - Green Energy Plan approved in 2011. This represented the Scottish Governments vision for developing offshore wind energy in Scottish Territorial Waters up to and beyond 2020 with a potential to deliver almost five Gigawatts (GW) of electricity generation capacity. The Plan identified short, medium and longer term sites and areas of search for off shore wind. In regard to Argyll and Bute the two sites that were identified in the short term were the site to the west of Tiree (Argyll Array) and the site to the west of Islay.
- 3.7 The starting point for the current draft sectorial plan for off shore wind was the review of the 25 medium term areas of search. A further scoping report was published in late 2011, identifying a potential 15 scoping areas of search in regard to off shore wind. A number of these areas were extensive in size and scale. Scoping Studies published in 2012 relative to wave and tidal development incorporated significant broad scoping areas of search. Draft Regional Locational Guidance (RLG) was also prepared in regard to the scoping areas of search and pre-statutory consultation was undertaken to raise awareness of the overall process for the development of the sectoral plans.
- 3.8 The current draft sectoral marine plans represent a further refinement, revue and update from the previous broad scoping areas of search published in late 2011 and 2012. The Council welcomes the iterative approach being taken by the Scottish Government in regard to marine planning when considering off shore wind, wave and tidal. The production of a single set of plans covering all three marine renewable sectors will assist in the delivery of a more integrated approach and allows the Council, its communities, key partners, stakeholders and potential developers to fully consider the opportunities and issues. The review of the initial broader areas of search and their refinement down to areas of a much smaller scale is to be welcome, as is the proposal to review these areas every two years.
- 3.9 The onshore requirements associated with future off shore renewable developments and the associated environmental implications that could come with these, is still an area of consideration that needs to be addressed. Whilst reference has been made to the importance of and opportunity to link to existing key harbours and ports, the onshore requirements from these developments has the potential to have a significant impact from both a local socio economic as well as an environmental perspective and is therefore considered an area of key consideration to the Council and its communities. A sustainable approach relies on the consideration of both the onshore and off shore impact. Whilst it is appreciated that at the strategic and regional scale this is difficult to quantify it does need to be taken into consideration.

- 3.10 In addition the issue of socio economic impact upon our coastal communities and businesses as a consequence of these developments should be taken into consideration when assessing the strategic impact of these offshore renewable developments. The Council welcomes the inclusion of a socio economic assessment but it is important to recognise that the site specific or local impacts are not within the scope of the assessment as this would only be considered at the individual project level analysis within the licensing process. In the previous Plan for Offshore Wind Energy in Scottish Territorial Waters (Blue Seas-Green Energy) no specific reference or analysis had been made in regard to socio economic impact yet it was considered a critical element to ensure that the proposals pursued are sustainable and that they deliver meaningful local economic and social benefit. To many of our communities the landscape is a critical economic asset and where the developments are close to the shore, particularly in regard to off shore wind and wave, consideration needs to be given as to the impact on this asset for the future. The socio impact seeks to quantify the potential impact from various activities including commercial fisheries recreational boating, shipping and tourism however it is difficult to determine the true impact at this stage and the Council would welcome further discussion with Marine Scotland on this issue.
- 3.11 Cumulative impact, not just from offshore renewable developments, but also from existing and proposed onshore development needs to be taken into account particularly in the case of the locations where there is a concentration of development types including off shore wind, tidal and wave, as is the case with the plans for the waters to the west of Islay. Distance from the shore, device type and timescales will impact on any visual impacts. Given the fact that there are uncertainties involved with predicting what effects may result from projects that are not yet planned the cumulative impact assessment was undertaken under by a risk based approach. This sought to identify where higher risks of significant effects might occur, whilst acknowledging that the identification of potential effects will continue through the project level Environmental Impact Assessment (EIA) process
- 3.12 The above comments would apply to all offshore renewable development options being considered in Argyll and Bute. In addition the Council is also aware that there is still uncertainty regarding a number of aspects of these offshore developments relative to water, geology, sediment and coastal processes, biodiversity, flora and fauna and further investigations and may well raise significant issues that may impact on the acceptability of these sites in the future. In many instances information that will inform the decision making process on these options is not yet available and will come forward over time. It is for this reason that it is important that these Plans are reviewed on a regular basis to allow information coming forward to be fed in and options re-assessed where it is shown that environmental and or socio economic issues cannot be mitigated against.

- 3.13 The draft Plans contain 10 proposed options for off shore wind farm sites, 2 of which are in Argyll and Bute, 10 for tidal, 2 of which are in Argyll and Bute and 8 for wave energy, 3 of which are in Argyll and Bute. These are in addition to the existing options contained with the Blue Seas Green Energy off shore wind sites (Argyll Array and Islay) and the wave and tidal saltire prize sites as well as the Sound of Islay Tidal Array demonstration site. All the proposed sites relating to Argyll and Bute lie within what is referred to in the Plans as the west region and are as follows:
- OWW1 North west of Islay
 - OWW2 West of Tiree
 - WW1 North west of Islay,
 - WW2 West of Mull
 - WW3 West of Tiree
 - TW1 South west of Islay
 - TW2 Mull of Kintyre
- 3.14 As part of the consultation exercise the draft Plans have been the subject of public consultation events in a number of locations across Argyll and Bute to allow as many communities to be engaged in the consultation process as possible.
- 3.15 When considering the sectoral plans it is evident that there are a number of areas in Argyll and Bute where there is a significant concentration of technologies between off shore wind, wave and tidal and it is important that the cumulative effect of these as well as the existing site options is fully investigated during regular reviews of the Plans. These include west of Islay, and west of Tiree.
- 3.16 With regard to the existing Argyll Array off shore wind site this is now also being shown as a potential wave site with a potential off shore wind site being identified further west. The original off shore wind site was to be located some 5km at its closest point and it was identified in the SEA undertaken via the Blue Seas-Green Energy Plan as having a potential moderate to major environmental impact on the landscape & visual amenity of the area. It is the case that each of these spatial options for off shore wind, wave and tidal will need to be continually reviewed and if these were to be taken forward by developers they would need to undergo their own individual EIA, social-economic assessment as part of the project level analysis within the licensing process. There would also be a requirement to work closely with Marine Scotland as the consenting authority, the local community and key consultees and stakeholders.
- 3.17 For these developments to go forward in the future the necessary grid infrastructure will need to be put in place to allow the energy generation to be accessed and utilised. Providing the necessary grid connection to these proposed marine renewable development areas will require an

integrated approach, substantial investment and infrastructure works. Given the potential impact of this it is unfortunate that the grid proposals could not have been incorporated in the current draft plans particularly in light of any potential environmental and socio economic impact

- 3.18 The spatial framework is simply the start of a process and an approach that the Council welcomes as opposed to piecemeal individual developments coming forward within no overall strategic context or framework. The Council welcomes these draft sectoral plans and the approach that underlines them and would look to work closely with Marine Scotland as the draft plans are further considered and refined.

4.0 CONCLUSION

- 4.1 There is no doubt that offshore renewable development offers potential economic opportunities not only for Scotland plc but also for Argyll and Bute however this is on the proviso that any development is undertaken in a sustainable manner and ensuring that there is maximum local socio economic benefit to our communities. It is vital that our natural renewable resource is used sustainably and in this regard the development of the Draft Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters is to be welcome in principle.
- 4.2 These plans build on the iterative approach to marine planning adopted by Marine Scotland and are a product of the review of the initial sectoral plans and scoping areas of search. The Council welcomes an approach that seeks to provide a strong and robust marine spatial planning framework for off shore renewable development based on a sound sustainable approach involving both a SEA and socio economic assessment. However a critical element that needs to be further taken forward is the integration of the onshore requirements associated with these offshore renewable developments and the associated environmental implications that could come with these, some of which may be significant.
- 4.3 In addition, whilst the Council welcomes the introduction of consideration of the socio economic impact of these developments on our coastal communities and businesses, it is considered that these needs to be further developed and continually reviewed. It will only really be at the individual project level that the true socio economic impact will become clear.
- 4.4 The Council welcomes the fact that these plans provide a spatial framework not just for wind but also future wave and tidal developments for Scotland plc and Argyll and Bute thereby giving us a full picture of the potential developments coming forward in the offshore wind and marine renewable environment. This allows our

communities and businesses to be fully informed of possible future developments and to plan and respond to the potential issues and opportunities being offered from these emerging sectors. It is difficult to know how much of these sites may be taken forward by developers in the near future. There are a number of influencing factors in regard to this including wave and tidal technologies being at a relatively early stage of development, the current uncertainties relating to the Energy Market Reform (EMR) and also issues relating to both grid capacity and charging. However notwithstanding all of this it is still important to have this framework in place.

- 4.5 The consultation recognises the critical importance of grid infrastructure and it is stated in the document that a strategic planning exercise will be taken forward in regard to grid applying a sustainability appraisal approach. The Council would fully support such an approach and would welcome the opportunity to input to this exercise. Given the potential impact of the necessary infrastructure that would be associated with providing the necessary grid connection to these proposed marine renewable development areas, it is unfortunate that this could not have been incorporated in the current plans particularly in light of any potential environmental and socio economic impact.

5.0 IMPLICATIONS

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| 5.1 | Policy: | Through the SOA, Corporate Plan, Economic Development Plan and the Renewable Energy Action Plan, the Council recognises the economic opportunities that the offshore renewable sector could bring to our communities and our area however this is only if these developments represent sustainable proposals that do not undermine the viability of our communities for the future. |
| 5.2 | Financial: | None |
| 5.3 | Legal | None |
| 5.4 | HR: | None |
| 5.5 | Equalities | None |
| 5.6 | Risk: | None |
| 5.7 | Customer Service: | None |

6.0 APPENDICES

- 6.1 See questions and response below

Executive Director of Development and Infrastructure

28 November 2013

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Full details on the consultation in respect of the Draft Sectoral Marine Plans can be viewed at

<http://www.scotland.gov.uk/Publications/2013/07/8702/downloads>

CONSULTATION QUESTIONNAIRE

In order to facilitate the consultation process, readers are invited to focus their responses on the following questions. However, responses are not limited to these questions and additional comments are welcomed.

Plan Development

1. Do you agree with the approach (outlined in Section 3 of the Sectoral Marine Plans) used to develop the Plans?

Yes No

Please explain:

The draft sectoral marine plans build on the iterative approach to marine planning adopted by Marine Scotland and are a product of the review and refinement of the initial sectoral plans including the Blue Seas – Green Energy Plan for Offshore wind and the subsequent scoping areas of search for off shore wind, wave and tidal. The Council welcomes an approach that seeks to provide a strong and robust marine spatial planning framework for off shore renewable development based on a sound sustainable approach involving both a SEA and socio-economic assessment.

2. Do you have any views on the findings of the Sustainability Appraisal Report? Do you think that all the social, economic and environmental effects (positive and negative) have been identified? Are there other issues that should be taking into account in the preparation of the Final Draft Plans?

Cognisance has been taken within the SEA of the cumulative (or in combination) effects of development within multiple areas. This assessment also included, as far as possible, the effects of other relevant offshore and coastal activities. The information on these other activities originated from their own SEAs and from project level environmental assessments. However a critical element that needs to be further taken forward is the integration of the onshore requirements associated with these offshore renewable developments and the associated environmental implications that could come with these, some of which may be significant. The fit with other policy and strategy plans such as N-RIP, National Planning Framework 3, Scottish Government Economic Strategy and our own marine coastal development plans and local development plan is a crucial consideration.

The Council welcomes the introduction of consideration of the socio economic impact of these developments on our coastal communities and businesses, however it is considered that these needs to be further developed and continually reviewed. It will only really be at the individual project level that the true socio economic impact will become clear. Providing the necessary grid connection to these proposed marine renewable development areas will require an integrated approach, substantial investment and infrastructure works. Given the potential impact of this it is unfortunate that the grid proposals could not have been incorporated in the current draft plans particularly in light of any potential environmental and socio economic impact

3. The SEA has identified a range of potential effects from the Draft Plans. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

A number of the recommendations include focus for the requirement for project level assessment and the targeting of further research to address uncertainties identified in the assessment process. It is difficult at a strategic and regional level and from the information available to really determine the local impacts at this stage.

4. The Socio-economics Report has identified a range of potential impacts on existing sea users. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

Consultation with existing sea users is critical and the fishing and aquaculture industry and tourism industry are key sectors for our area and link to the Government's Economic strategy in relation to food and drink and tourism development. The impact on our local coastal communities and businesses are also a key consideration and need to be taken into account at an early stage in the process.

The socio impact seeks to quantify the potential impact from various activities including commercial fisheries, recreational boating, shipping and tourism. However, it is difficult to determine the true impact at this stage and the Council would welcome further discussion with Marine Scotland on this issue. It is determined at this stage that there will be a need to address cumulative issues relative to communities, shipping, commercial fisheries, recreation, biodiversity, defence, landscape, socio impact, coastal processes and aviation. The cumulative impact is a critical consideration and it is important that there is on-going review and monitoring to identify at an early stage any significant issues.

5. Taking into account the findings from the technical assessments, do you have views on the scale and pace of development that could be sustainably accommodated in Scottish Waters?

There are a number of influencing factors in regard to this including wave and tidal technologies being at a relatively early stage of development, the difficulties of developing in what is often a very challenging marine environment, current uncertainties relating to the energy pricing and in particular the impact of the Energy Market Reform (EMR) and also issues relating to both grid capacity and charging. However notwithstanding all of this it is still important to have this framework in place.

6. Are there aspects of the Draft Plans that you believe should be improved? Are there any aspects you believe should be taken forward differently?

Please explain any reasons for your answer and provide details of any suggested improvements:

Grid considerations and further considerations of the on shore impacts resulting from these draft sectoral marine plans should be fully mapped in order to allow a fully integrated approach to be adopted.

7. Do you believe an appropriate balance, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts been achieved in the Draft Plans?

Yes No

Please explain:

There is no reason at this stage to suggest otherwise and there is still no clarity on the rate of development of these sites although the cumulative impact from all developments going forward needs to be carefully monitored and reviewed.

Draft Plan options

8. The Draft Plan for Offshore Wind Energy proposes 10 Draft Plan options. What are your views on the Offshore Wind Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. OWN1)

In general it is felt that the current draft sectoral marine plans represent a further refinement, review and update from the previous broad scoping areas of search published in late 2011 and 2012. The Council welcomes the iterative approach being taken by the Scottish Government in regard to marine planning when considering off shore wind, wave and tidal. From the 10 sites proposed across the Plan for offshore wind 2 are located within the Argyll and Bute area and at this stage neither the SEA nor the supporting socio economic assessment indicate any significant issues relating these however these assessments are at a strategic and regional level only at this stage and we would seek to continue to review this situation and to work closely with Marine Scotland as proposals develop.

9. The Draft Plan for Wave Energy proposes 8 Draft Plan options . What are your views on the Wave Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. WN1)

As per above

10. The Draft Plan for Tidal Energy proposes 10 Draft Plan options. What are your views on the Tidal Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. TN1)

As per above

11. Do you believe any draft plan options be removed from the Draft Plans for Wind, Wave and Tidal Energy?

Yes No

If Yes, please indicate which proposed Draft Plan options you believe should be removed (using the relevant indicator), and explain why :

Not at this stage but it is important that there is an on going review of these sites particularly as more local information becomes available in regard to each individual site with respect to socio economic impacts including impacts on local fisheries, tourism, local communities and environmental impacts .

Plan Implementation and Review

12. The Plans, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often do you believe should this be done and why? Who do you believe should be involved in the Plans Review Steering Group, to oversee the review process?

As a minimum there should be a two year review period particularly given the evolving nature of these marine sectors and the uncertainty in regard to impact etc. Key stakeholders should be involved in the review including those local authorities with a significant number of sites in their area such as Argyll and Bute.

Strategic Environmental Assessment

13. To what extent does the Environmental Report set out an accurate description of the current environmental baseline? Please also provide details of any additional relevant sources.

No specific comments

14. Do you agree with the predicted environmental effects of the plans as set out in the Environmental Report?

Yes in general but again this is at a very strategic level and the Council would look to key agencies such as SNH to advise on these specific elements.

15. Do you agree with the recommendations and proposals for mitigation of the environmental effects of the plans?

At the strategic level it is difficult to fully assess the impacts locally.

16. Are you aware of any additional on-going research or monitoring that may help to fill gaps in the evidence base, particularly relating to the marine environment and its interactions with renewable energy devices? Please give details of additional relevant sources.

No

17. Are you aware of any further environmental information that will help to inform the environmental assessment findings?

No

Additional comments

18. Do you any other comments you wish to make of the Plans and / or the related assessments?

See main report