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Offshore Wind Consultation
Scottish Government
Marine Planning and Policy Division
Area 1-A South
Victoria Quay
EDINBURGH EH6 6QQ

Dear Marine Scotland

Solway Firth Partnership supplementary response to The Scottish Government Draft Plan for Offshore Wind Energy in Scottish Territorial Waters, SEA and Analysis of Consultation Responses

Thank you for providing feedback on the Analysis of Consultation Responses at recent events around the Solway Firth and for inviting further responses to the Offshore Wind Plan and SEA.

Solway Firth Partnership¹ has given careful consideration to the role and purpose of the organisation in regard to this consultation. The Objects of the Partnership, set out in our Memorandum and Articles of Association, are:

- (a) to promote and advance education of the public about working and living sustainably in the Solway Firth area of Southern Scotland and North West England; and
 - (b) to preserve and protect, for the public benefit, the environment covering the land, coastal zones and waters of the Solway Firth area by seeking to guide, encourage and enhance the integration of environmental, social and economic policies including the sustainable management of pollution, waste, land reclamation, provision of public amenities and other related activities;
- and to do so either independently and/or in association with Local Authorities, environment agencies, public bodies, conservation bodies, voluntary organisations, local communities and others.

In pursuit of this second objective, Solway Firth Partnership feels it is important to re-iterate the points made in our original response of 27 September 2010. Specifically that:

- the consultation process has been unsatisfactory;
- environmental and socio-economic impacts have not been adequately assessed;
- conclusions are based upon value judgements rather than a sound evidence base due to an incomplete analysis of all potential impacts;
- the Offshore Wind Plan risks de-stabilising marine planning in the Solway Firth.

¹ The Crown Estate and Scottish Natural Heritage are corporate members of Solway Firth Partnership but have not contributed to this response.

We also wish to draw your attention to the disparities between the conclusions of the Department of Energy and Climate Change Offshore Energy SEA2 and the approach taken by Marine Scotland within this SEA regarding assessment of impacts on seascape (Annex 1). We believe this further supports our original comments and demonstrates a lack of cross border consistency contrary to the ministerial commitment to marine planning for the Solway Firth.

In addition to re-iterating our original concerns, we also wish to highlight additional issues with the Offshore Wind Analysis of Consultation Responses and associated events. We have set out detailed comments in Annex 2 but the key point is that the Analysis document and the online reports of events of 25 and 26 January fail to convey the strength of local opposition to the draft Offshore Wind Plan and SEA and the level of dissatisfaction with the process by which it has been produced.

In view of the deficiencies in the consultation process, the obvious omissions in the SEA regarding cross border impacts and the potential for the Plan to undermine the ambitions of the Scottish Government relating to marine planning, we believe that the Draft Offshore Wind Plan must be re-visited to provide further assessment of evidence relating to the Solway Firth and that consideration must be given to the timing of its publication. The aim would be to create a more robust and holistic plan that would have local support. It would also help to avoid the possibility of challenge which we believe the Plan, in its current form, is open to.

Yours sincerely

Pam Taylor
Project Manager

Annex 1: Disparity between the conclusions of the DECC Offshore Energy SEA2 and the approach taken by Marine Scotland within the SEA of the Draft Plan for Offshore Wind Energy regarding assessment of impacts on seascape

The recently published Department of Energy and Climate Change Offshore Energy Strategic Environmental Assessment addressing offshore wind development in English and Welsh territorial waters and the UK Renewable Energy Zone (beyond 12nm) demonstrates an inconsistency of approach north and south of the border.

Extract from Marine Scotland Strategic Environmental Assessment of the Draft Plan for Offshore Wind Energy in Scottish Territorial Waters, Non-Technical Summary, May 2010:

“Based on the findings from the SEA process and other technical considerations, it is anticipated that all ten short term options could be progressed between 2010 and 2020, as part of the Plan, if appropriate mitigation is implemented to avoid, minimise and offset significant environmental impacts, as identified above.”

Extract from Department of Energy and Climate Change UK Offshore Energy Strategic Environmental Assessment, Non Technical Summary, February 2011:

“Major development of offshore wind farms in nearshore waters could result in significant effects on landscape/seascape. The siting of offshore wind farms well away from the coast is consistent with what is occurring in other European countries, and the potential use of alternative foundation types would facilitate OWF siting in deeper waters. Reflecting the previous OESEA and the relative sensitivity of multiple receptors in coastal waters, OESEA2 recommends that the bulk of new OWF generation capacity should be sited away from the coast, generally outside 12 nautical miles. The environmental sensitivity of coastal areas is not uniform, and in certain cases new offshore wind farm projects may be acceptable closer to the coast. Conversely, siting beyond 12nm may be justified for some areas/developments.”

Annex 2: Additional comments on the Offshore Wind Analysis of Consultation Responses and associated events

1. Despite Solway Firth Partnership having completed a respondent form indicating its original response should be publicly available this was not displayed on the Marine Scotland website until 21 January. The same applied to a large number of other respondents. One of the primary purposes of the follow up events held on 25 and 26 January was to 'ensure the assessment of consultee views was accurate'. It was very difficult for people to comment on the accuracy of an analysis of responses when many of the original submissions only became available a few days earlier.
2. The timing of offshore wind events on 25 and 26 January conflicted with the pre-arranged Scottish Marine Regions consultation event on 27 January. This created confusion about the purpose of events which was exacerbated by two using the same venue on consecutive evenings. Further, the event on 25 January in Dumfries was on Burns' Night.
3. Meetings have not been sufficiently well advertised. For example, the meeting of 25 January in Dumfries was only advertised in a Stranraer newspaper.
4. Solway Firth Partnership has raised explicit concerns about lack of consultation and assessment of impact on neighbouring interests including Hadrian's Wall World Heritage Site. This is misreported in the Analysis of Consultation Responses as Hadrian's Wall AONB.
5. There has been a lack of clarity about the process and the points at which the public and other organisations can contribute. Other major plans such as Marine Plans and River Basin Management Plans set out a clear Statement of Public Participation at the outset and this type of approach would have been beneficial.