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Your Ref:  
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Offshore Wind Consultation  
Marine Scotland  
Area 1-A (South)  
Victoria Quay  
Edinburgh  
EH6 6QQ

27 September 2010

Dear Marine Scotland

**Solway Firth Partnership response to The Scottish Government Draft Plan for Offshore Wind Energy in Scottish Territorial Waters and SEA consultation**

Thank you for the opportunity to respond to the Draft Plan for Offshore Wind Energy in Scottish Territorial Waters and SEA.

Solway Firth Partnership is a coastal and marine management body which supports integration of English and Scottish interests. Our aim is to support a vibrant economy while respecting the distinctive character, natural features, wildlife and habitats of the Solway Firth. We do this by bringing people together to identify and implement actions which integrate use and help ensure an environmentally sustainable future for the area.

Solway Firth Partnership's structure enables engagement by individuals, community groups, sectoral organisations, local authorities and statutory bodies. We encompass a broad range of interests and are committed to acting as an honest broker between everyone with an involvement in the marine area. We have a neutral position regarding offshore wind developments while recognising the need to address climate change and explore alternative energy technologies. However, we are very concerned that the process of creating the Draft Offshore Wind Plan has not taken sufficient account of local impacts and marine interests in the Solway area.

Although a Corporate Member of Solway Firth Partnership, The Crown Estate has not contributed to this response given its interest in offshore wind developments.

## **1. Consultation**

**In our view, the consultation undertaken does not fulfil requirements for ‘early and effective engagement of the public and interested parties’.**

1.1 Many of the proposals in the Draft Plan would have significant impacts on the south side of the Solway yet local communities and key stakeholders in England have not been consulted.

1.2 The consultation material talks about the need to ‘maximise transparency’ however not everyone has access to the internet and no hard copies of the consultation documents are available. For plans which have such major implications for local communities and businesses, information needs to be much more accessible.

1.3 Maps in the consultation documents are not adequate. People require much clearer maps of the local area and marine users require co-ordinates in order to make informed comments. No base maps appeared on the slides during the consultation presentations making it very difficult to interpret information.

1.4 Active local consultation has been undertaken too late in the consultation period. Although there has been a concession on the original closing date, the approach has increased suspicion about the process on the part of local stakeholders.

1.5 There was insufficient notice of consultation events.

1.6 Local consultation events were not advertised in local press although Marine Scotland had given assurance that this would happen.

1.7 Provision should have been made for advance booking and reception arrangements for consultation events.

1.8 Presentations at the consultation events should have included more information about the local area and less about approaches being taken elsewhere which was of little interest to most of the audience.

## **2. Environmental and Socio-Economic Impacts**

**The Plan and SEA make value judgements which we question. We request that the process is subject to independent review.**

2.1 There has been insufficient scrutiny of the short term options to propose that these are ‘progressed as soon as possible’.

2.2 Of the nine remaining short term options in the Plan, the Solway currently has two in close proximity to one another. Coupled with the scale of the existing Robin Rigg windfarm, and the impacts of onshore windfarm developments on both the north and south shores, this allocates a disproportionately large area of the Solway for short term development.

2.3 Although there is reference to negative visual impacts on National Scenic Areas on the north Solway coast sites directly affecting these areas are included as short term options.

2.4 Insufficient account has been taken of impacts on the Solway Coast AONB (Area of Outstanding Natural Beauty) and views from the Lake District National Park.

2.5 No account has been taken of impacts on Hadrian's Wall World Heritage Site.

2.6 Existing seascape guidance<sup>12</sup> indicates a minimum 8km from shore exclusion area for large scale developments with recommended distances increasing when factors including landscape designations are taken into account. This precludes development in Wigtown Bay yet this site is proposed as a short term option.

2.7 Further consideration needs to be given to the land based infrastructure required to service offshore developments; this could have significant impacts on rural coastlines.

2.8 Tourism is a vital element of the local rural economy and the undeveloped, elemental quality of much of the Solway coast is a fundamental attraction for visitors. The wild and isolated nature of the area is also extremely important to local people.

2.9 There are advanced proposals for a Biosphere Reserve in Galloway and more embryonic proposals for a National Park of which the unspoilt and high quality Dumfries & Galloway marine and coastal environment is an integral part. Both these proposals have potential to act as a catalyst for economic regeneration which could be significantly compromised by inappropriate development.

2.10 The potential to develop coastal wildlife and access tourism is likely to be compromised; for example, the RSPB land purchase in Wigtown Bay provides an opportunity for visitor centre and access developments and there are proposals to develop a Saints and Sinners coastal path around the Solway.

2.11 There are significant knowledge gaps regarding the behaviour of key species. It is recognised that while we have information about the roosting and feeding areas for wildfowl and waders, we have little information about flight lines. Improving this knowledge base is essential to identifying suitable offshore wind development sites.

2.12 The Solway is believed to be an important breeding and nursery area for fish including sharks, skates and rays but little is known about the distribution and behaviour of non-commercial fish species.

2.13 There does not appear to have been proper consideration of impacts on marine European Protected Species including cetaceans, otters and turtles, all of which occur in the Solway.

2.14 Many of the Solway's rivers are important for salmon, sea trout and other migratory fish and the impact of offshore windfarms on these species is poorly understood. There are river SACs (Special Areas of Conservation) connected to the Solway which have Annex 2 species as qualifying interests: Atlantic salmon in the Bladnoch and Atlantic salmon, river and sea lamprey in the Eden. The Solway Firth European Marine Site also has river and sea lamprey as qualifying interests.

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<sup>1</sup> DTI Guidance on the assessment of the impact of offshore windfarms, Seascape and visual impact report: Enviro Consulting Ltd

<sup>2</sup> SNH Commissioned Report No 103, An assessment of the sensitivity and capacity of the Scottish seascape in relation to windfarms: Scott et al

2.15 Commercial fishing is an important part of the Solway's cultural identity, supports traditional lifestyles and fragile rural economies. Vibrant ports and harbours are a focal point of coastal towns and villages on both sides of the Firth and are a key part of the area's tourist attraction. The industry provides employment for hundreds of local people in the catching and processing sectors and there are a large number of jobs in ancillary businesses servicing this sector. The socio-economic impacts of offshore wind proposals on commercial fishing in the Solway area must be better understood.

2.16 Most local commercial fishing is undertaken from vessels under 15 metres in length which are not required to carry VMS (Vessel Monitoring System) or AIS (Automatic Identification System) satellite tracking equipment therefore do not register on The Crown Estate MaRS system.

2.17 Static gear fishing (creeling and potting) for lobster, crab and whelk is widespread in the potential development areas identified. Local static gear fishermen are either non-affiliated or are members of the Galloway Static Gear Fishermen's Association. None are affiliated to SFF (Scottish Fishermen's Federation) therefore there has been no consultation with this sector.

2.18 There are important king and queen scallop fishing grounds in the potential development areas identified. Most Solway scallop boat skippers are not affiliated to the Scallop Association or the SFF therefore there has been no consultation with this sector.

2.19 Local scallop grounds are also fished by the Manx fleet, some of whom land into Dumfries and Galloway's harbours and whose catch is processed by local businesses. There has been no consultation with Manx interests.

2.20 There are also high quality nephrops, brown shrimp and mixed whitefish fisheries in the areas identified which are targeted by vessels operating from both Dumfries and Galloway and Cumbrian ports. There has been no consultation with Cumbria Sea Fisheries Committee or with the Cumbrian fishing industry.

2.21 When stock levels allow, there is a valuable cockle fishery in the Solway and impacts on this have not been taken into account.

2.22 Impacts on shellfish aquaculture have not been considered.

2.23 Recreational sea angling plays an important part in providing jobs, supporting sustainable coastal communities and high quality of life for local people and visitors. This activity is undertaken from small vessels which do not carry satellite tracking systems therefore there is a strong likelihood that the scale of angling activity in the potential development areas has been underestimated. As many as 70 angling boats take part in single angling events in Galloway. This activity generates a substantial income for local hotels, shops and angling based businesses.

2.24 Sailing is an important recreational activity and brings valuable income to the local economy. The proposals are likely to have adverse impacts on marinas at Whitehaven, Maryport, Kirkcudbright and Stranraer.

2.25 There is an active local dive club comprising around 30 members operating from Isle of Whithorn. Several of the proposed sites would impact directly on the club's activities.

2.26 Local mariners believe that the methodology employed in creating the Offshore Wind Plan may have captured as little as 10% of the boat based activity in the Solway Firth.

2.27 There has been insufficient consideration of navigational impacts including increased danger for all sea users.

### **3. Marine Planning**

**There is a risk that fast tracking the Scottish Offshore Wind Plan fundamentally compromises the marine spatial planning process for the Solway Firth. Timescales should be agreed which allow marine spatial planning for the Solway to develop and which enable offshore wind proposals to be evaluated within a meaningful cross-border context.**

3.1 The Scottish Offshore Wind Plan is being developed before integrated marine spatial planning as required by the Marine Acts is allowed to take effect. The Solway is a special area. This is reflected in the high number of wildlife, habitat and landscape designations the area carries. The wellbeing of the local economy and coastal communities is intimately linked with the sea. The estuary is unique in that it spans the national boundary between England and Scotland. The Solway Firth requires comprehensive cross border marine planning which addresses English and Scottish interests, the allocation of space for renewable energy development and assessment of associated impacts on the environment and local communities in a fully integrated way.

3.2 A marine spatial planning approach is being taken to establish renewable energy capacity in the Pentland Firth and Orkney Waters. Firth of Clyde, Sound of Mull, Shetland and the Berwickshire Coast have all benefited from the Scottish Sustainable Marine Environment Initiative which lays the foundations for regional marine plans in these areas. The Solway must be allowed to progress marine planning to a similar level before detailed options for renewable energy development are identified. It is imperative that the marine planning process is given the opportunity to gain the support and confidence of all interests if it is to have a chance of long term success.

3.3 The fact that the 10 sites already granted exclusivity agreements by The Crown Estate prior to the SEA and Offshore Plan being developed have become the 10 short term options has led to considerable scepticism about the process. While commercial, technical and some environmental considerations may have been 'frontloaded' in the planning process, socio-economic considerations have not. It is impossible to develop a balanced plan when key outcomes have been set at the start and vital elements of the process are missing altogether.

3.4 The 'do maximum' approach does nothing to assess the optimum scale of offshore wind development when balanced with all other relevant considerations. This must be a key aim of the planning process.

3.5 We are very concerned that Marine Scotland currently has an expectation that the final Offshore Wind Plan will be automatically transposed into regional marine plans. This would fundamentally undermine marine spatial planning. The Offshore Wind Plan must remain a draft until it has been considered as part of the regional marine spatial planning process.

Please feel welcome to contact me if there is anything you would like to discuss.

Yours sincerely

**Pam Taylor**  
**Project Manager**  
**Solway Firth Partnership**