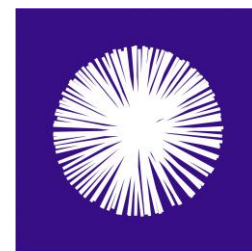


## **Response to the Scottish Government Offshore Wind Sectoral Marine Plan Scoping Consultation**

**by the Scottish Environment LINK Marine Group**

**Date: 18<sup>th</sup> July 2018**



Scottish  
Environment

**LINK**

### **Introduction**

Scottish Environment LINK welcomes the opportunity to engage with Marine Scotland's planning exercise to inform the future development of offshore wind in Scotland and welcomes the plan-led process to identifying offshore wind leasing areas.

LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment.

LINK considers the future expansion of Scotland's offshore wind sector, and utilisation of the abundant renewable energy resource in Scottish seas, will play a key role in reducing Scotland's carbon emissions and contribution to climate change. LINK does, however, have concerns over the environmental impact of a rapidly-expanding offshore wind industry, and believes that the widespread, large-scale development of the industry will present several planning challenges.

### **General comments**

#### **Environmental impact**

LINK is concerned that many of the sites identified far from shore are data poor and lack reliable and detailed information on habitat type, marine mammal presence, and seabird foraging and migration behaviour. It is essential that before any consent is given for offshore development that any data gaps for offshore sites are filled to ensure the benthic footprint of the development does not impact any sensitive, vulnerable or rare habitats or species.

LINK is conscious that the sites far from shore will be harder and more expensive to survey prior to development and monitor before and during construction and operation, which may lead to reduced sampling effort. It is important that sites further offshore are held to the same surveying and monitoring standards, to ensure no significant impacts, as those sites in inshore, coastal waters.

LINK is pleased to see that scoping out of Natura 2000 sites have been included within the site identification modelling and would like to affirm our view that any large-scale offshore wind development within marine SPAs or SACs would be unacceptable.

LINK consider it important that, where possible, noise and vibrations during installation, operation and decommissioning of offshore wind turbines are minimised using noise reduction techniques to ensure there are no detrimental impacts on marine mammals and other vulnerable marine life.

## LINK Consultation Response

LINK is concerned that the electromagnetic field impact on elasmobranchs, eels and salmonids has not been included in the sector plan.

LINK recognises that the areas for development identified within the sector plan are areas of interest and, therefore, not guaranteed to be developed. However, a key concern for LINK with the current approach to offshore wind development is the insufficient attention given to the cumulative impact of multiple offshore wind sites, within Scottish waters and in the wider regions (e.g. northern North Sea). LINK considers that the development of a sector plan provides an opportunity to develop a detailed and reliable method for assessing cumulative impacts of multiple developments at all, or a combination of, the sites of interest identified.

A cumulative impact assessment must consider the direct and indirect impacts on marine populations and communities from habitat loss, changes in seabird, fish and marine mammal behaviour, and the increased connectivity between fouling communities (including non-native species) growing on wind turbines.

LINK would like to highlight their concern over the cumulative impact three areas of search – NW1, NW2 and NW3 – will have on the North Rona and Sula Sgier SPA. If all three areas are developed, they would encircle the SPA and, consequently, any seabirds migrating to, or foraging from, the SPA would have to pass through an offshore wind development. Similarly, LINK have concerns over the W1 area of search, which is particularly close to the Mingulay and Berneray SPA and covers the south and west approach to the SPA.

It is important that the cumulative impact assessment also considers what kind of impact the mass removal of offshore wind turbines will have on marine ecosystems at the end of operation.

### Technology support

The expansion of the offshore wind industry into deeper offshore waters will require further investment and support for new technology, such as floating wind. LINK considers that wind farm developments further offshore have the potential to reduce impacts on seabirds (further from coastal colonies and foraging sites) and that floating wind technology could reduce noise and vibration impacts on cetaceans (e.g. reduce, if not eliminate, the need for pile driving during construction). Therefore, LINK would like to see strategic support and investment in floating wind technology to encourage development further offshore, once these assumptions are demonstrated.

In addition to supporting floating wind technology, LINK would also like to see further investment in noise reduction technology and the establishment of a standard noise limit during construction, operation and decommissioning (cf German regulations).

### Marine Planning

LINK would like clarification on how the proposed sector plan will integrate with the development, implementation and operation of Regional Marine Plans and the decision-making process. Some of the areas of search identified within the sectoral plan fall within 12 nm of the coast and, therefore, within the jurisdiction of the RMP.

A key component of RMP development is the incorporation of important societal and cultural interests of the area, which are not considered in this sector plan. To fully adopt an *ecosystem approach* to marine planning, all sectors and stakeholders must be involved in RMP development and decision making. However, the proposed sector plan represents a siloed approach to future offshore wind development, where areas for development will have already been identified prior to the establishment of a Regional Marine Planning Partnership and the subsequent RMP.

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## LINK Consultation Response

LINK would like clarification on how the proposed sector plan will integrate with Crown Estate Scotland's Asset Management Pilot Scheme, where management of some CES assets, including the seafloor out to 12 nm, could potentially be transferred to a local community group or organisation. The CES Pilot Scheme does not include offshore wind, but there are leasing areas identified within the sector plan that fall within 12 nm and therefore will have an impact on how the seafloor will be managed.

The areas of search identified within the proposed sector plan is different to the Plan Options for Offshore Wind and Renewable Energy in the National Marine Plan, which raises several concerns:

- Some of the identified areas of search overlap areas previously identified for wave energy. Will there be a priority given to offshore wind or is it determined on a first-come-first-served basis?
- Is there interest in producing a sectoral plan for other types of offshore renewable energy and for these to be combined with the offshore wind sector plan?
- There is potential for sites to be used by multiple types of renewable energy exploitation (i.e. wind and wave energy). Has the potential for multi-use sites been investigated?
- Will the sector plan supersede the options map in the NMP? If so, the NMP will need to be updated accordingly.

**This response was compiled on behalf of LINK Marine and is supported by: Marine Conservation Society, National Trust for Scotland, RSPB Scotland, Scottish Wildlife Trust and Whale and Dolphin Conservation.**

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