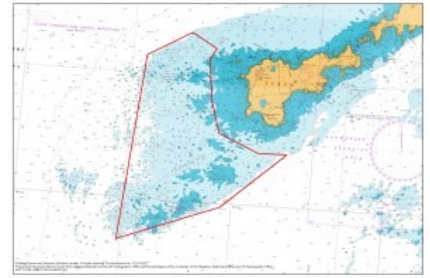
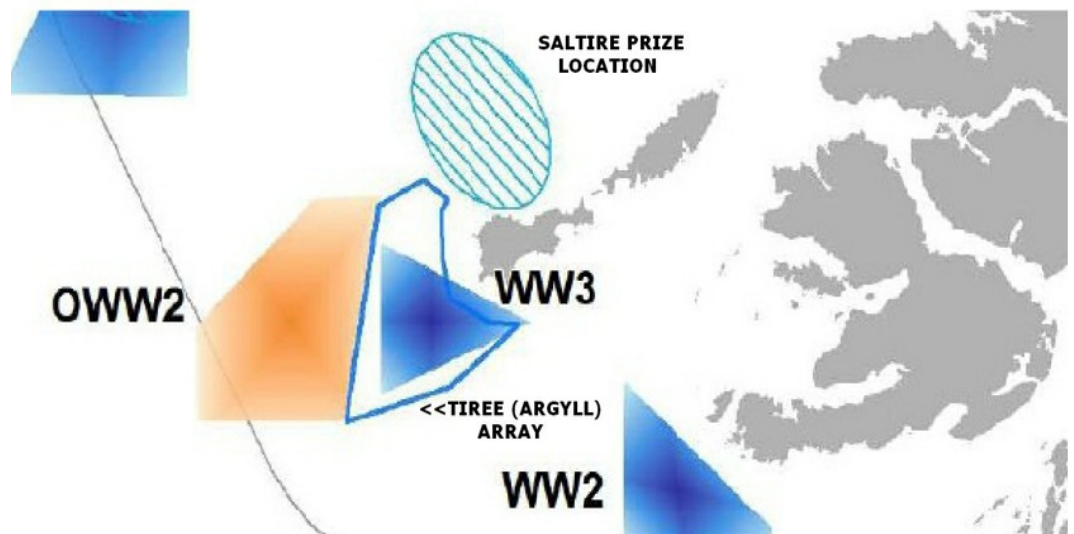


NO TIREE ARRAY

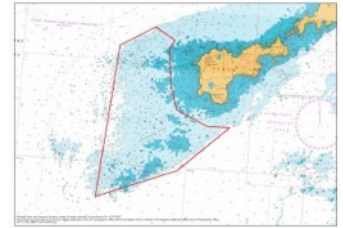


PLANNING SCOTLAND'S SEAS

Response Submission



Visualisation from Balephull of part of the proposed Tiree Array...the furthest turbines in sight are on the boundary line of OWW2



Index:

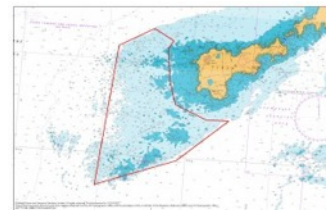
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Turbine scale compared to Skerryvore and the Clansman



Background and Terms of Reference



No Tiree Array(NTA) was formed in 2010 with the following Objectives and Aims:-

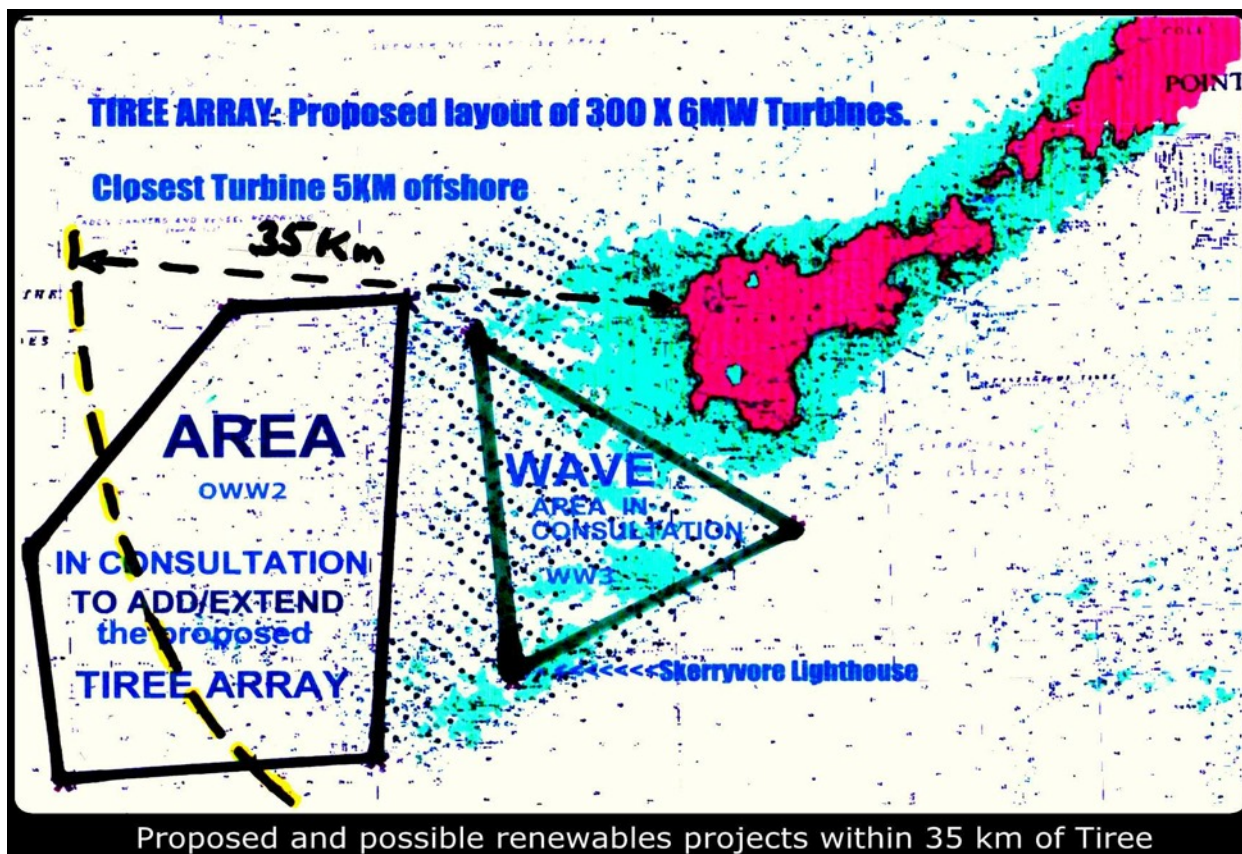
To use all reasonable means to:-

- Conserve the Isle of Tiree’s natural heritage, culture, economy and landscape value.
- Resist the proposed construction of the Tiree (Argyll) Array or any ancillary development within 35km of the island’s coastline, to accord with the recognized protocol of visual significance.
- Protect the island’s fragile environment from any detrimental impact resulting from such development.

(Go to www.no-tiree-array.org.uk/?page_id=687 for full details of NTA’s constitution)

NTA’s submission is governed by the terms of its constitution, consequently this response is limited to;-

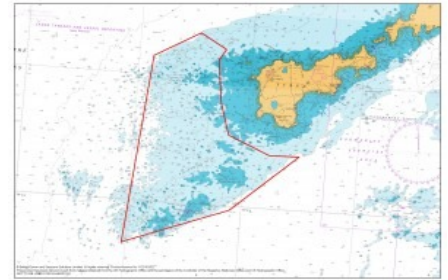
- A Tiree perspective of the national policy issues of this consultation.
- The Tiree specific issues of this consultation



NOTES:- At the Jan 2011 Tiree Consultation of the 2010 Draft Plan, Marine Scotland advised NTA had comparable consultee status to the Tiree Community Development Trust(TCDT)

NTA's membership and supporters include:

- (1) Members of the Tiree community, who qualify for voting membership of TCDT.
- (2) Stakeholders in the Tiree Community who are dis-enfranchised from voting membership of TCDT.

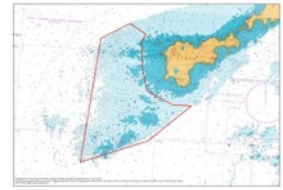


ABBREVIATIONS :-

A&B	ARGYLL AND BUTE COUNCIL
CE	CROWN ESTATES
CFU	COMMON FISHERIES POLICY
EU	EUROPEAN UNION (EEC)
EMR	ENERGY MARKET REVIEW
MS	MARINE SCOTLAND
MPA	MARINE PROTECTION AREA
NTA	NO TIREE ARRAY
SAC	SPECIAL AREA of CONSERVATION
SG	SCOTTISH GOVERNMENT
SNH	SCOTTISH NATURAL HERITAGE
SPR	SCOTTISH POWER RENEWABLES
TCDT	TIREE COMMUNITY DEVELOPMENT TRUST



Summary and Recommendation



This is governed by the constituted objectives and aims of **No Tiree Array(NTA)** which include;-' **to resist the proposed Tiree (Argyll) Array within 35km of Tiree's coastline**'

▪ Consultation Process

Notwithstanding conducting a 50 plus venue road show(incl Maryport in Cumbria), all venues were abysmally attended. The near absence ,at national and local/community level ,of any marketing and/ or public information of the consultation,has to be the root cause of this abysmal public attendance.

The Tiree consultation meeting was symptomatic. Its recommended outcome for a further consultation meeting must be endorsed and implemented by SG.

Of concern is noting how responses to such consultations are logged and incorporated in the process. NTA notes, that notwithstanding making a response to the SNH Visualisation Consultation, no reference is made to it in SNH's summary.

It would appear that unless a response is submitted in SG's proscribed response forms, and submitted in the proscribed format ,then the response's content may not be included in any summary of responses, to the possible exclusion of its input to SG's response and action. This may be deemed a failure of process

▪ Marine Planning

This is 'long' on platitude and 'short' on substance.

NTA raised a series of questions at the Tiree consultation meeting(**APP A**)which required further reference from SG. As yet NTA has not had SG's response.

A major omission in this section of the consultation was with reference to aggregates,and their extraction/dispersal in connection with the development of Offshore Renewables. NTA estimates the Tiree(Argyll)Array, if developed,will require 3-5mill cubic metres aggregate extraction/dispersal. Aggregate extraction/dispersal at the national level,as a consequence of offshore renewables proposed in this consultation:-

1. **has not been estimated**
2. **nor has its environmental impact been assessed.**

This is major omission from this consultation.

▪ Offshore Renewables

The relationship between this consultation and current offshore development is not clear. Self-evidently this consultation, and its outcome, removes the last vestige of the 2008 Developer-Crown Estates driven offshore renewables agenda.

The status of current offshore renewables development, and investment, suggests that none of the proposed offshore wind draft plan option location could/would be operational prior to 2020. But current consented and planned renewable development, both on and offshore, is anticipated to achieve **SG's target to meet an equivalent of 100% demand for electricity from renewable energy by 2020**(*Route Map for Renewable Energy in Scotland*). In such case, any development /investment in any of the proposed locations in this consultation, will be surplus to Scotland's requirements.

- **No case for the strategic necessity of such a surplus is presented in this consultation**
- **No business model, of any possible export market is presented in this consultation.**

As Renewables are subsidy driven/dependent, why is this level of possible Scottish electricity generation being considered?

This consultation ignores the uncomfortable reality that:-

- The Crown Estates(CE)have no plans for the foreseeable future for a further wind farm leasing round in UK waters.
- and
- It is well documented that there is currently sufficient awarded capacity in UK waters which still requires to be consented, and constructed, before the sector can absorb further capacity.



• Marine Protection Areas(MPA)

NTA firmly supports the development of an MPA network in Scotland's seas as proposed.

NTA maintains the case to include the [Skye-Mull search area \(including Tiree\)](#) as an MPA is overwhelming. APP3 of the "**Protected Areas Consultation Overview**" makes this overwhelming case. Among the protected features of the 33 original MPA's to be considered, 12 include 'Burrowed Mud',6 include 'BlackGuillemots,5 include 'Flame Shell' and 4 include 'deep sea sponge aggregations'. **Not one of these 33 original MPAs include risso dolphins , basking sharks or minke whales** as a protected feature.

The [Skye-Mull search area \(including Tiree\)](#) is the **sole search area** for basking sharks as a protected feature

In the UK, Basking Sharks are protected under Schedule 5 of the Wildlife and Countryside Act 1981, the Countryside Rights of Way Act 2000, the Wildlife (Northern Ireland) Order 1985 and the Nature Conservation (Scotland) Act 2004.

The case is overwhelming to make the [Skye-Mull search area \(including Tiree\)](#) a designated MPA

• RECOMMENDATION

1. As this Consultation, due to the enormity of the associated documentation,has failed in its primary objective ie to consult and inform proximate communities of the impact of possible adoption of these Draft options, NTA recommends that Scottish Government **re-consults** such proximate communities, as per the proposal made at the Tiree Consultation.
2. As scheduled adoption has been delayed 12 months from Spring 2013 to Spring 2014,there can be no urgency for adoption, unless this is politically-driven to be completed before the Sept 2014 Scottish Independence Referendum.
3. Due to the lengthening of the technology trajectory, combined with subsidy, investment and political uncertainty, further delay to all current UK(incl Scottish) offshore projects only add to the lack of urgency to progress adoption.
4. As the Crown Estate has no plans for the foreseeable future for a further wind farm leasing round in UK, then any interest by developers in any of these DP options for the foreseeable future can only be conceptual.
5. Manifestly there is a contrast in the degree of development complexity between any of the proposed OWW sites. This consultation should have appraised this complexity. This would assist developers and government to adopt appropriate phased development. Had this applied to the 2010 DP option then the proposed Tiree may not have progressed to its current state ie on hold. The Islay Array is,de-facto, also on hold.

NTA recommends SG re-evalates the consultation process with a view to conducting a more informed consultation, and to permit same, by delaying any possible adoption a further 12 months, to Spring 2015.



CONSULTATION PROCESS 2009-2013



This is the 3rd consultation in 3 years on Renewables Planning, of specific relevance to Tiree.

Consultation 1

The 2010 and 2011 consultation was with regard to the possible adoption, in March 2011, of Scottish Power Renewables' (SPR) proposed Argyll Array. The initial Sept 2010 consultation was scheduled to be held in Oban. The manifest confusion as to the appropriate consultation location possibly arose from SPR erroneously naming the proposed array '**Argyll Array**'. The other proposed Argyll-located arrays, in the 2011 Draft Plan, were named '**location specific**' ie **Islay** and **Kintyre**. Had SPR named, or been required to name, the proposed Argyll Array location specific ie "**Tiree Array**" then no such confusion would have arisen. Consequently, at very short notice, the meeting was re-located to Tiree. It was poorly publicised, and very poorly attended.

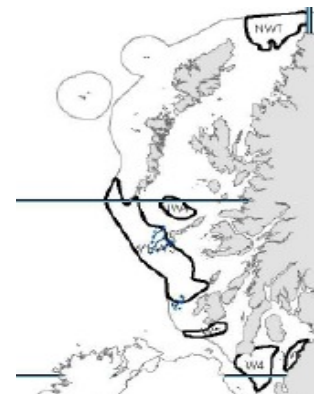
Consultation 2

Sept-Oct 2012 Marine Scotland proposed holding seven regional public information events, focusing on plans for offshore wind, wave and tidal energy ie the precursor to the current Consultation.

The original schedule of 7 venues, for what was a national consultation, **excluded** any venue in Argyll and Bute (A&B). The proposals, outlined in the consultation, were of Immense significance to, A&B, and in particular to Tiree.

The omission of an A&B venue was incomprehensible and unacceptable.

It was only after a strong protest to Scottish Government from NTA, that Marine Scotland re-considered its venue selection, and arranged an A&B consultation in Oban.



Consultation 3:

MS/SG in this 2013 national consultation, by nominating 50 plus venues (incl Maryport, Cumbria), may have addressed some of the presentational shortcomings of the 2 previous consultations, however the stark fact remains that the turn-out at most venues was abysmal. This represents a failure in consultation.

With regard to Tiree, it was regrettable that the 2nd Sept meeting was cancelled due to a 24 hour 'haar' at Tiree. This impacted on attendance at the subsequent re-scheduled meeting. The local perception, that this consultation was not in the real world engendered apathy. This perception arises from the proposed Tiree (Argyll) Array being on hold with SPR using the **IE** word with regard to any possible re-start.

The enormity of the documentation (2000plus pages) was excessive. This inhibited meaningful study by impacted communities, with limited resources and/or limited access to appropriate expertise.

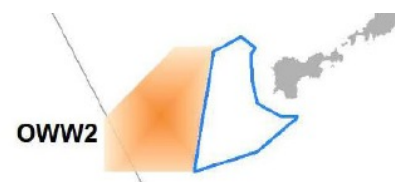
Addressing the substance of the consultation proved unmanageable.

The presentation of **OWW2** and **WW3** was incoherent. The relevance of **OWW2** and **WW3** within the context of the proposed Tiree Array on hold, added to the confusion. The context was SPR's Dec 2012 decision in Dec to put the proposed Tiree Array on hold whilst SPR develops :-

'..... technical solution that is fit for purpose in dealing with the physical characteristics of this site'. (SPR update 7th Dec 2012) .

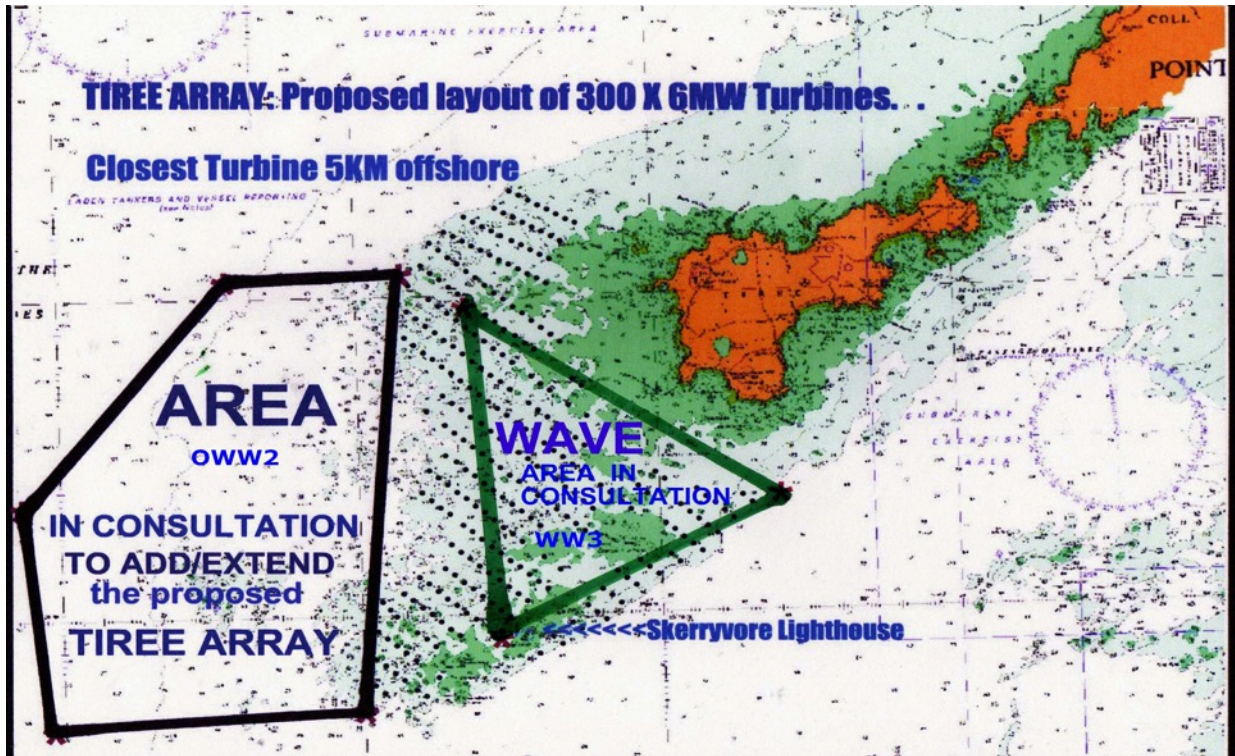
To all intents and purposes the meeting was suspended (Report **APP B**), and a further Tiree-specific consultation was deemed essential. It was agreed to be held at some indeterminate future date.

WW3 is located within the current proposed Tiree Array. No explanation was offered as to how this could be considered, notwithstanding the current Crown Estates' lease is exclusively with SPR to develop a possible off-shore wind farm. (The shaded area to the north of Tiree is a Saltire prize wind search area which will be addressed later in this submission)



NTA, at the 10th Oct Tiree meeting, submitted a series of questions (**APP A**) the answers to which required MS to revert to other SG depts. NTA still awaits SG's response.

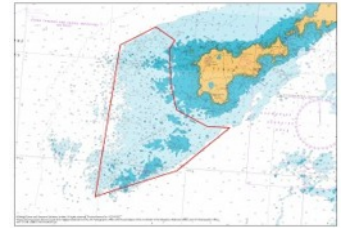
Prior to the Tiree consultation NTA asked MS for the specific co-ordinates of **OWW2** and **WW3**. With the data provided, and limited software, NTA derived the chart below :



The lack of a presentation, at the Tiree meeting, by Marine Scotland, of a comparable chart was a grave omission in addressing Tiree-specific issues of this consultation.

This was a national consultation driven by SG. It may have national, and local significance, consequently Scottish Government must review the consultation content, and its process, to satisfy all stakeholders that it has been fit for purpose.





Planning Scotland's Seas Consultation was presented in 3 finite sections:-

Marine Planning/Offshore Renewables/Marine Protected Areas (MPAs)

NTA's submission corresponds to this format.

MARINE PLANNING

This is 'long' on platitudes and 'short' on substance.

NTA raised a series of questions at the Tiree consultation meeting (APP A) which required further reference from SG. As yet NTA has not had a response. The over-arching generality of this document, other than with a line by line forensic interrogation, makes it impossible to offer the substantive response it requires. NTA, and comparable community organisations, do not have the financial, or physical resources to conduct such a forensic interrogation.

Re 'Scotland's National Marine Plan:-

Chapter 4 General Policies :

Gen 4 Community Impact p25: Tiree is the only Scottish offshore renewable location in which such a Scenario Mapping has been carried out. Islay, a comparable impacted community, has not had such a Scenario Mapping exercise. Does this imply that that SG, planning authorities and stakeholders have made an arbitrary decision not to offer Islay such a Scenario Mapping exercise.

The Tiree Scenario Mapping Exercise is incomplete and was based on flawed socio-economic research. It lacked research into the potential demographic transfer, and its consequential creation ie a company dependent island economy.

Mandatory Scenario Mapping must be included in the marine planning process.

Gen 9 Engagement p28 : By what criteria is this judged ?

Gen10 Sound Evidence p27: Who assesses if reasonable efforts have been made?

Gen12: Nature Conservation p29: There is no evidence that alternative locations have, or will be considered. This consultation and its adopted outcome suggests pre-emption any possible consideration of alternative locations

Gen 16 Noise p36 : This is technical, and conceptual, self-seeking nonsense on the part of planners.

Chapter 6 Fisheries:

If **OWW2**, **WW3**, and the **Saltire prize zone** are adopted, then Tiree's fishing industry will be emasculated /destroyed. The Saltire prize zone should have been incorporated in this consultation.

Chapter 11 Renewables

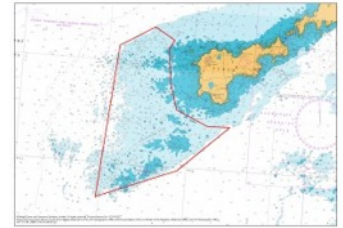
See Offshore Renewables section for specifics

Chapter 12 Recreation

Kitesports: Tiree is omitted. This omission must be corrected. Tiree recently hosted the British Kite Surfing Championship.

Chapter 16 Aggregates :

A major omission in this section of the consultation was with reference to aggregates, and their extraction/dispersal in connection with the development of Offshore Renewables. NTA estimates 3-5mill m3 aggregate extraction/dispersal may be required for the Tiree(Argyll)Array, if developed. This aggregate extraction/dispersal, at the national level associated with the offshore renewables proposed in this consultation, has (1)not been estimated (2)nor its environmental impact assessed. This is major omission from this consultation. Note p93 states: '**There is a presumption that cables will be buried or rock dumped**'



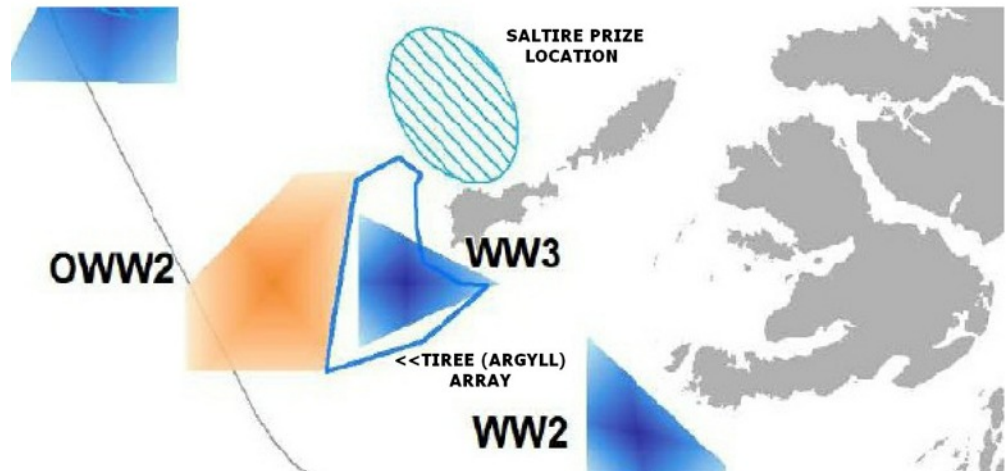
Offshore Renewables

Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy

There is no substantive explanation as to how **OWW2** and **WW3** were derived from the 2012 consultation

There is no evidence of any examination of alternatives to derive these locations.

WW3 is a technical nonsense. No explanation is offered as to how this can co-exist within the current proposed Tiree(Argyll) Array.



Does it imply SG is assuming the proposed Tiree(Argyll)Array, currently on hold, is not re-started,and therefore SG is considering WW3 as an alternative project?

NTA, understands that SPR has an exclusive lease from the Crown Estates to develop an offshore wind farm on this site ,and the Crown Estates have not amended, renegotiated,nor cancelled this lease.

Any development of **WW3 and the Saltire Wave site** will exclude access to Tiree’s fisherman, thereby emasculating a significant Tiree economic multiplier.

The Saltire Wave site should have been included in this consultation.

2.3.1 Climate Change and Energy: these are unilateral SG targets with no relation to any international **conventions and/or obligations..**

2.4.1 Transition to a Low Carbon Economy: the ref to ‘Scotland to lead the world ...’ is **pure humbug** .Similar claims have been made by Denmark and Germany . Norway has already acquired this status and is the leader of this aspirational pack.

2.4.2 This vague reference to ‘local communities ’, ‘benefit ’,‘lasting legacy’ is further humbug. This is addressing community benefit (CB) or more accurately community bribe. For onshore wind farm development this is now mutually agreed by Govt and Developers, at a minimum of £5000/Mw. Why has this consultation not addressed /quantified this issue?

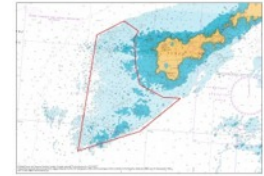
D7.3 Refers to the Sustainability Appraisal and its reference to **RECREATION and TOURISM,**whereas D7.3 p70 makes **no reference to Tourism.**

TOURISM /Visit Scotland during a visit to Tiree,indicated to NTA, that in their opinion Tiree’s economy was tourist dependent.

The omission of **Tourism** ,a cumulative issue of particular significance, is a very serious omission from this document.

OWW2 must remain an intangible concept, till SPR not only resolves their current problems with the proposed Tiree (Argyll)Array site, but progress it to possible consent,construction and ultimately, generation. The latter,assuming a prompt re-start, will not occur till 2021, at the earliest. This contrasts with the heady optimism of SPR’s 2010 Scoping Request indicating generation in 2015-16.

Mitigation issues applying to the proposed Tiree Array have still to be addressed. To suggest that impacts on features ‘**such as Skerryvore will need to be considered**’ rather than an obligation to mitigate, suggests a cavalierish approach to planning.(Sustainability Appraisal Sectoral p 25 3.2.37)



Para 3.4.6 refers to the impact on the proximate community. It does not underestimate the issue and what is required to assess these impacts. It makes no commitment or understanding as to how these issue will be addressed

The technological trajectory of turbines and foundations has as yet to deliver for the proposed Tiree(Argyll)Array. Site depth for **OWW2** varies between 40m to 150m. It is inconceivable this trajectory will move towards conceptual feasibility for the **OWW2** site till late 2020's - early 2030's.

Delays, similar to the proposed Tiree Array have been experienced by **all developers** of the Mar 2011 Adopted sites. Not one Array has, as yet, gained consent. The investment decision for Scottish Offshore Renewables is proving increasingly uncertain, and will be very dependent on the UK EMR review.

This has further particular significance with regard to any possible Scottish Independence

Sustainability Appraisal of the Sectoral Plans for Offshore Renewable Energy:-

SG puts great faith in '**cross-cutting policies**' to ameliorate off-setting and/or minimising any negative aspect/impact on environmental effects (Sustainability Appraisal Report p59-p76).

What is lacking from this document is any explanation of these '**cross-cutting policies**' and how they give SG confidence in their efficacy.

Will SG produce a supplementary report lead the way to this utopian nirvana?

Fig 2.2/Table 2.1 and Fig 2.3/ Table 2.2 ie Details of scale and occupancy scenarios are not supported with any details how they have been estimated or derived.

Table 2.1: Details of scale and occupancy scenarios for wind energy

Scenario	Indicative Scale of Development (GW)	Indicative Occupancy (%)
Low	3	4.8 – 26.5
Medium	7	11.6 – 26.5
High	15	25.1 – 26.5

Table 2.2: Details of scale and occupancy scenarios for wave energy

Scenario	Indicative Scale of Development (GW)	Indicative Occupancy (%)
Low	0.5	0.2 – 0.6
Medium	1.25	0.5 – 0.6
High	2.5	1.0

The high scenario Indicative Scale of development (ie assuming max build -out)appears too low. **NTA estimates the wind energy High scenario may be as high as 25 GW.** This is based on layering the area of the proposed Tiree Array(1.8GW) over the draft plan options of this consultation. Any developer will wish to max-out any site .

The trajectory of turbine design also suggests the indicative scale of development may be under estimated.

A similar appraisal of the wave options indicate the indicative scale of development may be under estimated.

The significance is:-

- Most, if not all, of the DP options ,if they were to be developed, would be surplus to Scottish electricity requirements. Ergo any development will require a secure export market**

NTA has requested SG on many occasions to reveal any SG assessment of the export market for Scottish Renewables

Progress to considering development of any of these DP options must be predicated with market research into their possible economic viability in an implied export market

None has been forthcoming.

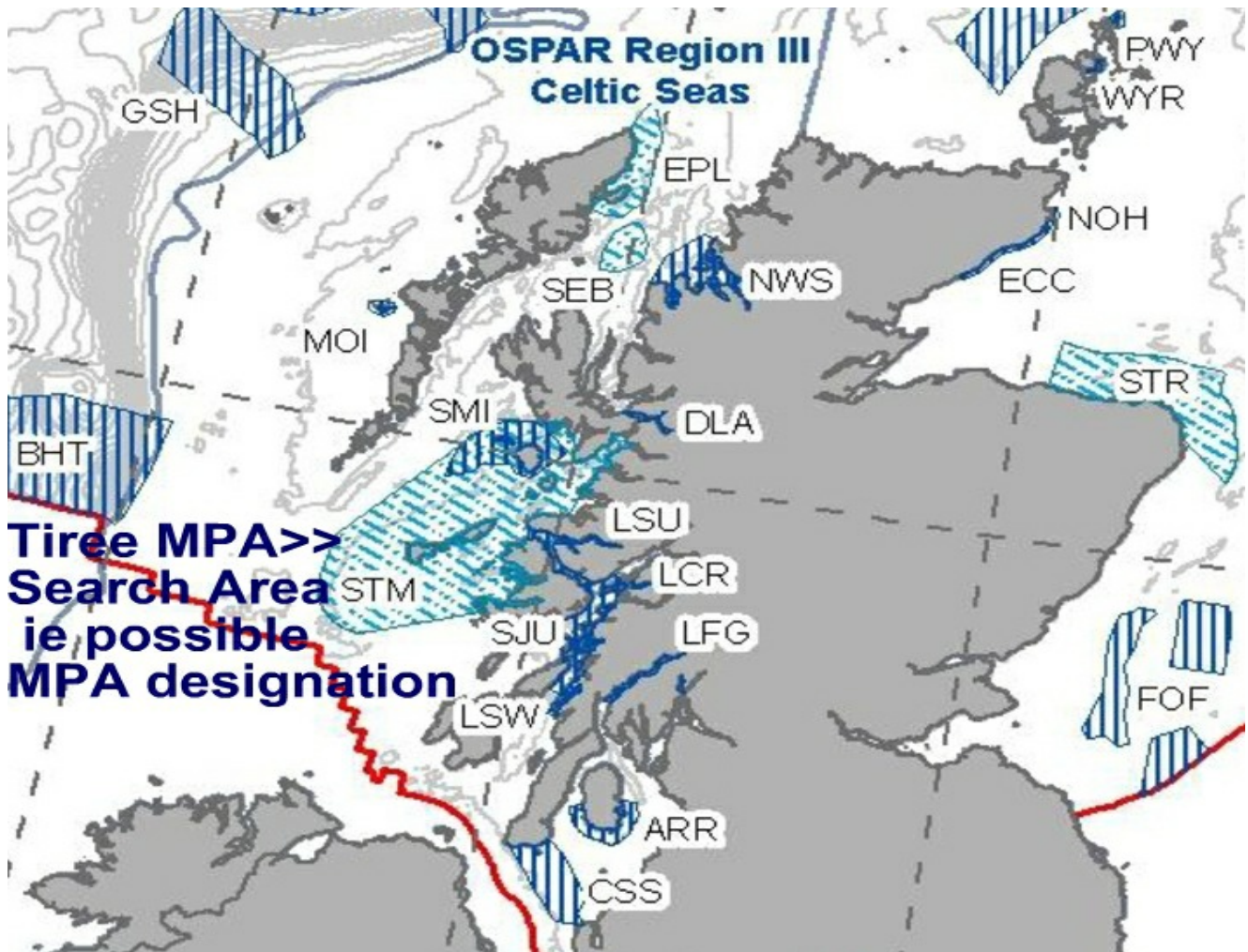


Marine Protected Areas (MPAs)

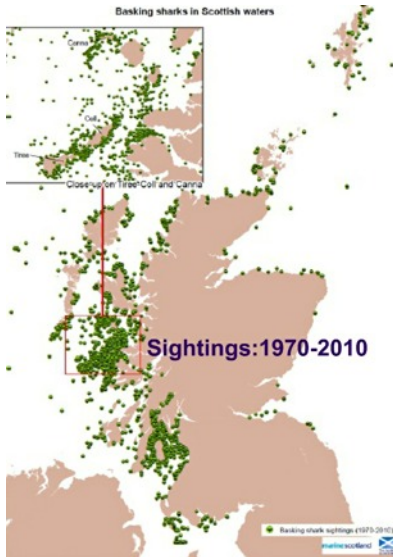
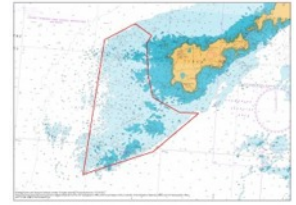
NTA firmly supports the development of an MPA network in Scotland's Seas.

From Scotland's Marine Atlas it is clear that the seas around Scotland are in turmoil, with concerns and declines over most of the seabed, declines in common seals, seabirds and sharks, skates and rays, and ongoing concerns with fish stocks in many areas. Within a system that puts the marine environment at the centre of marine planning, NTA believes a network of well-managed Marine Protected Areas is essential to help reverse these historic declines and enhance the many important benefits the sea provides us all.

Not only would NTA wish all the proposed MPA sites be adopted by Scottish Government, NTA specifically wishes the Skye-Mull search area (including Tiree) as below to be designated as a nature conservation Marine Protected Area by Scottish Government.



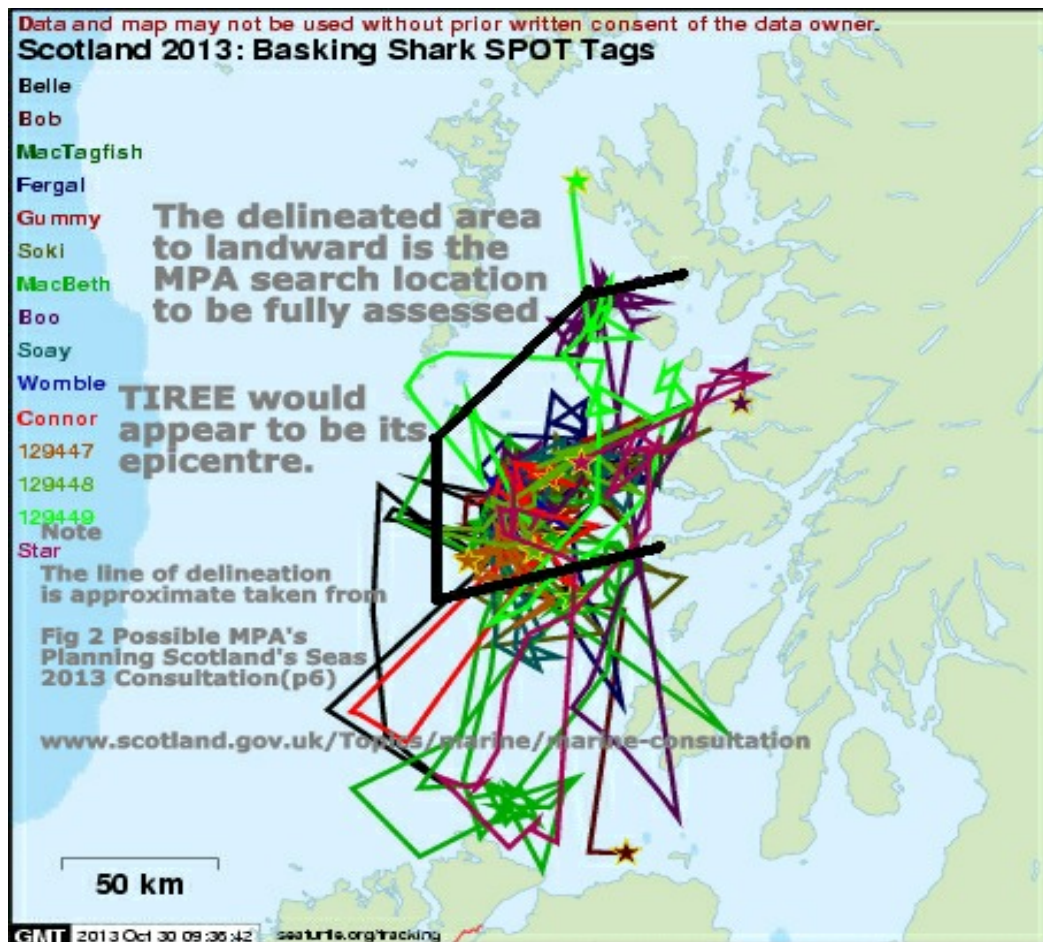
The Scottish Government has a legal obligation to enhance Scotland's seas and, according to international recommendations, the MPA network must support the wider marine environment. For each MPA, effective management must therefore be in place so that species and habitat recovery is possible both within and beyond the boundaries of the site. Zonal management that protects only the remnant extent of marine species and habitats, particularly of vulnerable benthic features, is not enough given the context of ecological decline documented in Scotland's Marine Atlas.



The **Skye-Mull search area (including Tiree)** is a designated international **BASKING SHARK HOT-SPOT**,

The genesis of this designation is from Marine Scotland's record of Scottish basking shark sightings for the period 1970-2010 .

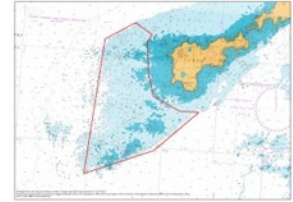
The current SNH Tagging project results, as of 12 Nov (below) confirms this designation, with the approx line of the **Skye-Mull search area (including Tiree)** superimposed on the tagging results .



In the UK, Basking Sharks are protected under Schedule 5 of the Wildlife and Countryside Act 1981, the Countryside Rights of Way Act 2000, the Wildlife (Northern Ireland) Order 1985 and the Nature Conservation (Scotland) Act 2004. These Acts make it illegal to intentionally kill, injure or recklessly disturb or harass Basking Sharks in British waters. Any person committing such an offence could face up to six months in prison and a large fine.

Also -

In 2007 Basking Sharks were designated a Prohibited Species under the EU common fisheries policy (CFP)

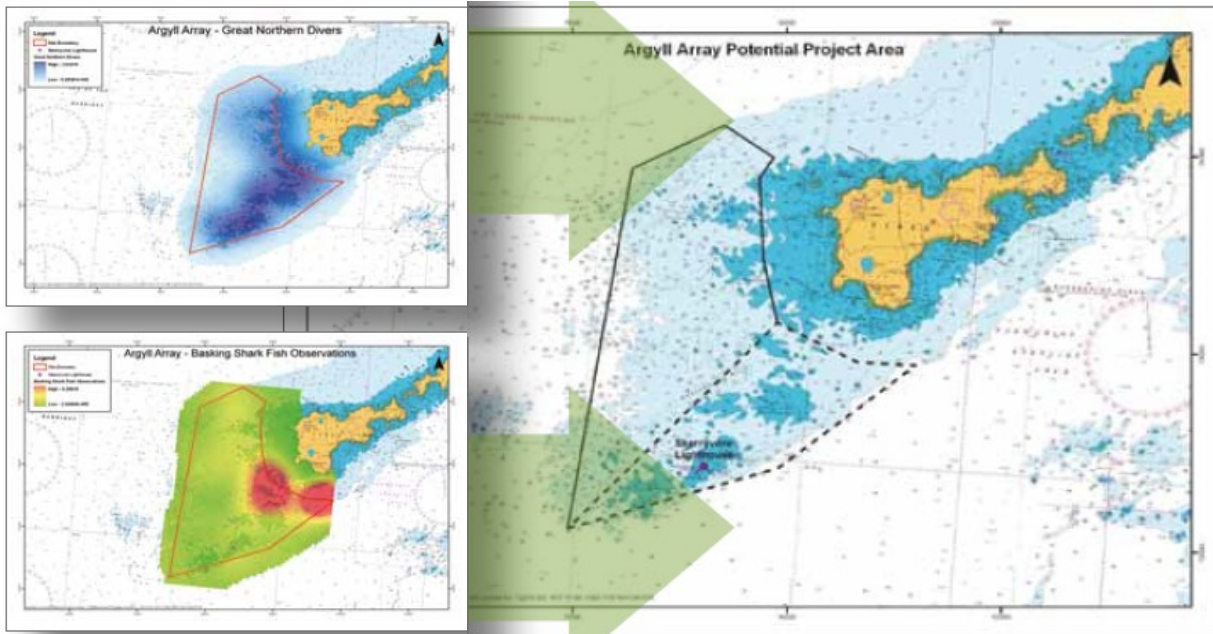


The critical requirement for the Skye-Mull search area(including Tiree) to be designated a MPA, is to ensure Scottish Government's abides by, and fulfills its legal obligations,as above, with regard to any possible adoption/consent of proposed offshore wind farm development(s), within this MPA search area.

SPR the developers of the proposed Tiree Array,advised in Oct 2012, just 5 weeks before putting the project on hold that they were considering a design revision as follows:-

In order to minimise potential impacts on birds including the Great Northern Diver ,we are considering a revision of the design of the windfarm to exclude part ,or all .of the Skerryvore Reeef Area , reducing the overall size of the windfarm. Doing this would also avoid the area where basking sharks are present as well as avoiding Skerryvore Lighthouse. (SPR Oct 2012 Update)

Potential reduction of project area

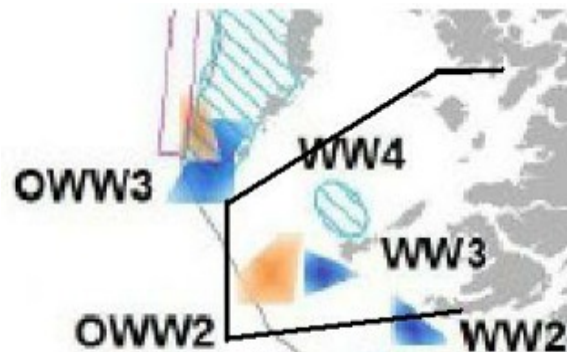


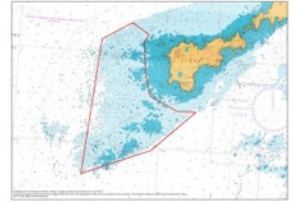
SPR's Oct 2012 concession '**to consider a revision**' has to be treated with cynical scepticism. SPR, despite repeated requests from NTA, has never provided the data and survey reports from which SPR derived their presentation.

MS' Oct 2012 Basking Shark Review referenced that in Aug 2012 ,SW of Tiree, on one day ,918 basking sharks were sighted .This conforms to the results of SNH's tagging project ie **the distribution of basking sharks within the proposed Tiree Array area is much wider/broader than SPR's presentation .**

Cynical scepticism suggests this concession '**to consider a revision**' conveniently removes, for SPR, the area of greatest technical difficulty from the proposed site, whilst simultaneously offering token mitigation, with regard to Skerryvore Lighthouse (Category A listed building).

The **Skye-Mull search area(including Tiree)** in addition to the proposed Tiree Array, also incorporates WW4,WW3, and most if not all all OWW2 (the search area line is approx). If the SNH Tagging shark project results are superimposed on this map(NTA does not have the requisite soft ware) it will confirm that **WW4, WW3, and OWW2 are all within the Basking Shark Hot-Spot Zone.**





Environmental and Technical Issues:

WAVE TECHNOLOGY:- Environmental consideration, cynical scepticism aside, has influenced SPR to consider a revision of the proposed Tiree Arrays' development area. An extension, and implications of this consideration, hopefully will persuade SPR and SG to drop/cancel the proposed Tiree Array.

Notwithstanding it must be self evident that WAVE technology is **inapplicable** to the possible **Skye-Mull (including Tiree) MPA.**

Basking sharks feed off surface plankton, therefore, the application of Wave technology, within a basking shark hot-spot area, cannot be considered.



A wave farm's ;-

- associated anchoring system
- under water cabling plus associated EMF issues,

will destroy the basking shark's natural habitat and environment.

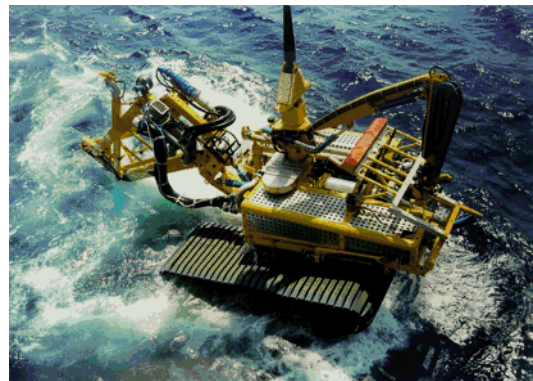
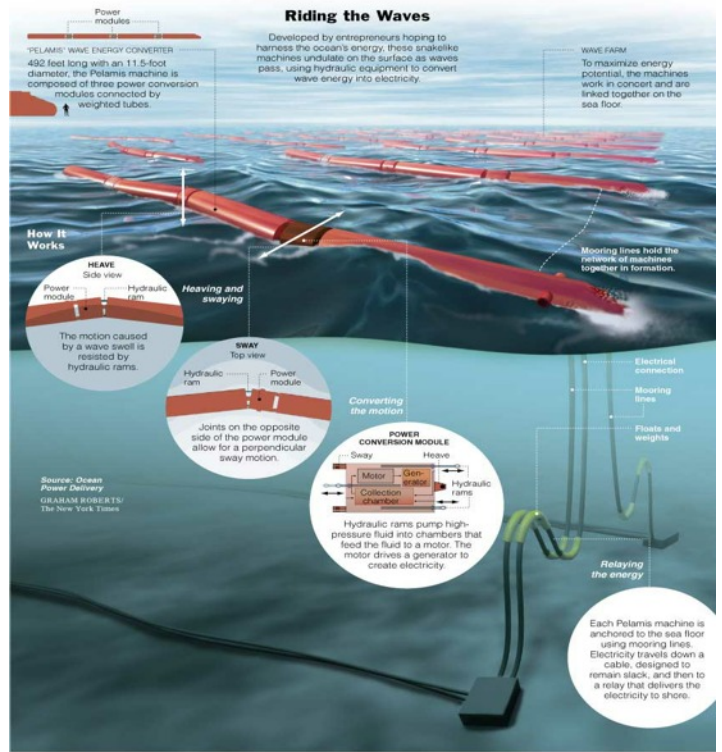
DREDGING, SCOUR and CABLE PROTECTION

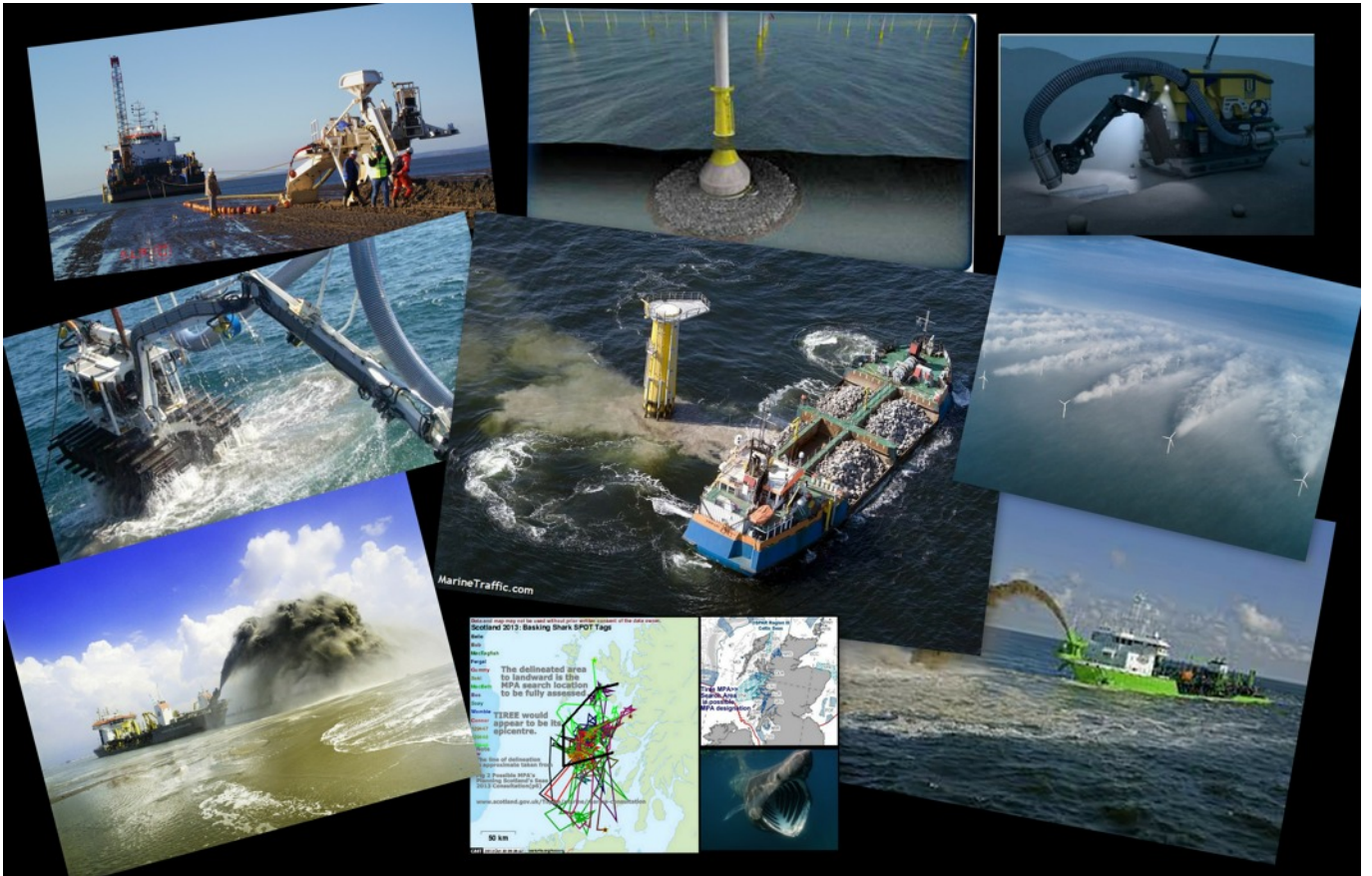
This has not been addressed in this consultation.

NTA estimates the aggregate extraction/dispersal for the proposed Tiree Array may be in the range of 3-5mill m3 (this includes the mainland HVDC connection). The cumulative aggregate extraction/dispersal for the **WW4 /WW3/OWW2** options may exceed 10mill m3.

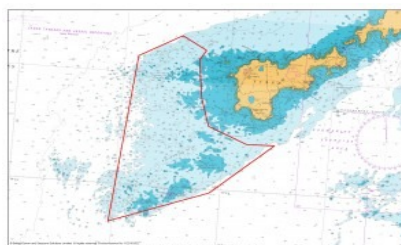
NTA maintains the implications of Dredging and Scour Protection with regard to the **Skye-Mull (including Tiree)** search area, **should be assessed now** to input and inform on any MPA designation, **and not**, as this consultation suggests, be addressed later in the process, at project level.

Prior to possible adoption ,the cumulative impact on Stanton Banks,an SAC, of any of the **WW3, WW4, OWW2** options must be assessed.





What brings a wry smile to Tirisdeachs ?... Most developer's images are taken in calm, idyllic conditions when Tiree's reality is-



APP A

Questions for MS' **Planning Scotland's Seas** consultation Tیره Oct 10 2013

Introduction:

Regretably, for this re-scheduled meeting, due to other commitments, the attendance of the No Tیره Array (NTA) Committee has been emasculated. These written Questions are submitted by the NTA committee. These are limited to macro elements, and Tیره specific issues, apposite to such a public meeting. NTA will be making a detailed submission in due course on all the documentation accompanying this Consultation process.

NTA seeks these Q, and their responses, are minuted at the 10th Oct Tیره meeting .

(Where possible NTA will give the ref to the appropriate document to which their Q refers)

Note : SG =Scottish government

These documents lack the following:-

1. SG's forecast of Scotland's electricity consumption for 2030/2050.
2. SG's energy saving targets for 2030/2050.
3. SG estimate of the generating capacity of the options considered in this consultation
4. By implication there will be surplus capacity if all options were to be developed. In such event would development be curtailed, or is it assumed SG can capitalise on an export market?

(Note NTA has asked SG on at least 2 occasions to support SG's assessment of the export market potential for the current offshore development . NTA, like Godot ,is still awaiting a response)

*The Scottish Government believes that Scotland can lead the world in the development and deployment of offshore renewable energy technologies
(Exec summary)*

- **Q:** On what basis ? Why? How much is SG prepared to subsidise this belief? What development does SG envisage?(All current technological development is primarily Danish/German and most deployment is Danish/German/English).

Notes:

DEVELOPMENT

Wind: No current Scottish offshore generated wind(Robin Rig was built in England and feeds into the UK via Cumbria)

Wave: Limited but Scottish. Very experimental, with a subsidy to match.

Tidal: Some minor Scottish technology. The lead applied tidal technology in Scotland is Norwegian and French (via SPR which of course is Spanish)!

Turbines (incl Floating): **NO** UK /Scottish design /R&D/Production /Fabrication.

Foundations: Limited to fabrication under licence.

DEPLOYMENT: Assumes export market (see above)

- **Q.** If the proposed development areas are all developed, what is the estimated power generating capacity/what is the ratio to domestic demand/ has the export market been analysed / how is the Scottish tax payer to be refunded the export subsidy?

The process for identifying the draft Options started by identifying broad areas of search through mapping resource and any potential constraints. To refine the areas of search, consideration was given to further detailed information on socio-economic, environmental and planning issues, as well as the key themes emerging from the pre-statutory consultation held in August 2012

- **Q.** Is this process fit for purpose ? What independent qualitative checks are applied ? Note a similar process derived the Tiree Array, which is on hold because it currently lacks a solution which is fit for purpose.
- **Q.** how did the near designation (2012)of the total area been Mull of Kintyre/ Islay /Tiree /Barra was reduced to the Sites now under consideration(2013) ?

Strategic Aims 1.2.1 The Draft Plans are based on the following strategic aims:

Maximise the contribution that offshore renewable energy makes to renewable energy generation in Scotland;

Maximise opportunities for economic development, investment and employment;

Minimise adverse effects on people, other sectors and the environment;

- **Q.** Is SG developing the right energy mix ? (Comment ; - is SG not endorsing the most expensive energy options, supported with max SG subsidy to developers thereby committing Scotland to become a high energy cost country ergo SG economy becomes uncompetitive)
-
- **Q.** Is SG satisfied that it has weighted maximising vs minimising correctly? What systems does it have in place to ensure their supposed rigour? What independent assessment is made of SG's weighting?.

The presumption of Consent as a stated requirement by the Minister of Energy implies imbalance in favour of maximising at the expense of minimising. Please comment

1.2.2 In relation to the development of offshore renewable energy around Scotland, the Plans form an integral part of a 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 Scotland's Next Energy Revolution

These docs had serious flaws and omission .NTA made a submission to Securing the Benefits to have it rejected on the basis that NTA's submission was local and not national .Tiree Array would appear to have been airbrushed out of the route map. Please comment.

Q. Why have the Solway options been re-instated when the lack of NRIP development was given as a reason for dropping them in the DRAFT PLAN ADOPTION MAR 2010?.

Tiree Specific:-

1. SG proposes possible development to double the current Tiree Array . As this development area was selected a matter of weeks after SPR had put the current proposed Tiree on hold to derive a technical solution that is fit for purpose ...are we in the real world??
2. Crown Estate are not considering any further off shore leases untill current leases are taken to a finite conclusion . Please comment.
3. The proposed Tiree wave development area cannot co exist with the current SPR /Tiree Array project . Please comment
4. If SPR was to drop the existing proposed Tiree Array would SPR be allowed to amend their current lease to develop a wave project ?
5. As the proposed extension to the proposed Tiree Array would go a long way to meet NTA's primary objectives, why doesn't SG persuade them to drop the existing proposed Tiree Array, and convert the lease to a wave project.
6. What assessment has SG made of any development and its associated O&M strategy on the proximate community?,
7. Master Planning :Prior to the adoption of the proposed Tiree Array, Tiree was promised a Tiree Master Plan. This did not happen and was subsumed into an Onshore Scenario Mapping Exercise (OSME). 2 out of 4 options offered no direct economic input/benefit to the proximate community. Only one offered the possibility of some economic activity/benefit ,but not to the proximate community. The majority of any such perceived benefit would go to Argyll and Bute(this was in turn based on some untested assumptions). This representation has been incorporated in A&B and SG presentations on the '**Masterplanning Concept**' "
8. The OSME lacked any research into the possible demographic transfer and the reduction of Tiree into a " Company Island " with a dominant employer dictating wage levels and many other socio economic drivers .This will be exacerbated by any possible further development . Please comment

Deemed Consent:

- **Q.**Why is SG incapable/or unwilling to designate the terrestrial components of off shore generation which may apply for deemed consent?

Note: (1) Tiree has had total misrepresentation by SPR of any possible Onshore HVDC converter station. Notwithstanding SPR's presentation of their commitment to put any HVDC converter station off-shore,under Deemed Consent legislation SPR could readily revert to a deemed planning application to put it onshore . Please comment.

(2) Wave generation dictates an onshore HVDC station . Please comment with regard to the proposed wave area designated in the existing proposed Tiree Array windfarm development

The following refer to : [*Planning Scotland's Seas Developing the Socio-Economic Evidence Base for Offshore Renewable Sectoral Marine Plans in Scottish Waters. Final Report*](#)

Three scenarios (termed 'Low Case', 'Central Case' and 'High Case') have been

applied within the study relating to different scales of possible future offshore wind, wave and tidal development within the Draft Plan Option areas in the period 2020 to 2030 as follows (in terms of additional capacity beyond existing lease agreements):

→ Offshore wind

- Low Case: 3GW installed capacity*
- Central Case: 7GW installed capacity*
- High Case: 15GW installed capacity*

Please clarify if these apply to development of the areas proposed in this consultation ie in addit to any development of the areas adopted in the DP Mar 2011

Reason for clarification is foll: _

The timing of any development within the Draft Plan Option areas is also uncertain.

In this study we have made a simplistic assumption that all development starts in 2023 and is completed by 2025. However, should development proceed within the Draft Plan Option areas this is likely to be staggered in the period 2018 to 2030.

- **Q.** What Draft plan options does this refer to? (The above schedule is a nonsense, unless of course SG indulges in "development" meaning "under study /evaluation" as opposed to "construction" Please clarify/comment).
- **Q.** What are the implications of the Crown Estates moratorium on further offshore leases.

The following refers to : **Planning Scotland's SeasSEA of Plans for Wind, Wave and Tidal Power in Scottish Marine Waters. Environmental Report**

Where interpretive data has been used within this assessment it has been used to simply provide an indication of potential 'hot spots', rather than identification of areas with limited constraints, with the uncertainty in the use of the data noted. This helps to add a slightly more informed picture of spatial risk to some mobile species.

- Please amplify/explain the efficacy of this approach.

6.7.40 Several option areas overlap with MPA search areas (OWW2, TW2, WW2 and WW3), and the progression of the MPA designation process that runs in parallel to this assessment, will be an important consideration in the selection of sites for renewables development in these areas

- Please update Tiree search area MPA status .
- **Q.** To what extent MPA selection may prevent renewable development in these designated areas

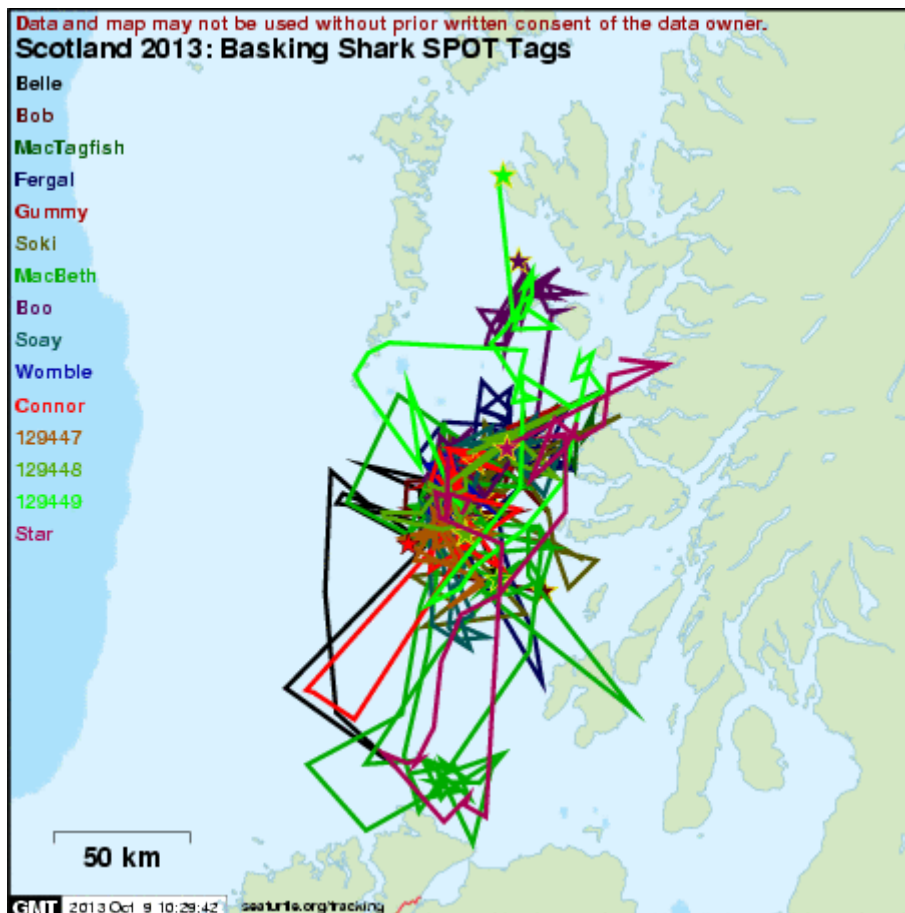
6.7.41 There is the potential for cumulative impacts for both seabirds and diving birds in the region, particularly for Draft Plan Options near to areas of known importance to birds, such as Islay and Tiree. Of particular note is the potential for increased collision and displacement risk for seabirds associated with multiple arrays of operating wind turbines, and similar risks for diving birds associated with groups of wave and tidal devices.

- What does "particular note" mean in this context ?

6.7.43 The potential for cumulative effects, such as the creation of barriers to movement, collision risk and impacts of renewable devices on mobile fauna

(e.g. elasmobranchs, cetaceans, seals), will need consideration for any development within the Draft Plan Options. The SEA identified the importance of waters within the West Region for a range of mobile species, particularly for Basking sharks, Common skate and seals. Basking sharks and migrating cetaceans are known to frequent the North Channel and the Sea of the Hebrides and this suggests that in combination potential wave (particularly near shore) and tidal energy development in these coastal waters may increase risks for these species. Project level assessments for new developments within the Draft Plan Options should be able to investigate these potential issues further.

- Lets get real:-Basking sharks (surface feeders) cannot co- exist with a wave project .. Tiree is an accepted basking shark hot spot. The possibility of a wave project in the area designated in this consultation should be dropped **NOW** . Please comment.



6.7.47 The region contains features of historic interest, including designated coastal sites such as Skerryvore Lighthouse in Tiree and Iona Abbey, and the potential for cumulative impacts on the setting of historic sites has been identified. For example, the placement of wind turbines in the Argyll Wind Array and nearby Draft Plan Options OWW1 and OWW2 may have the potential to occupy much of the seascape west of Skerryvore Lighthouse, particularly under a high occupancy scenario. The potential for such effects will be a key consideration for any project level EIA. Cumulative effects on marine archaeology, both known and unknown may also result from development within the Draft Plan Option. In general, the potential for impacts to marine archaeology would increase with greater offshore development. However, it is considered these

can be mitigated at the project level by undertaking appropriate site surveys and avoidance of infrastructure where assets are identified

- **Q.** On that basis can SG state : "*it is considered these can be mitigated at the project level by undertaking appropriate site surveys and avoidance of infrastructure where assets are identified*". What is required /intended ?

6.7.50 There is the potential for significant interactions with existing sediment and coastal processes, particularly for wave and tidal sites such as those off the west coast of Islay, Mull and Tiree. However, the precise impacts may only be able to be established at the project level.

- **Q.** Why at project level ? NTA estimates 3-5 mill tons of sediment disturbance as a consequence of the current proposed Tiree Array. It has not been rocket science to establish this estimate .SG seems reluctant to do so and or address the implications.

10 Oct 2013

APP B

MARINE SCOTLAND

Planning Scotland's Sea Consultation 2013

The original Tiree Consultation Meeting scheduled for the 2nd September having been called off at the last minute (due to Glasgow plane being cancelled) it might have been thought that the re-scheduled meeting on the 10th of October would be have been awaited with increased anticipation.

In the event only 14 people were advised as having signed in to the afternoon “drop in” session and seven (many of whom had attended in the afternoon) were in attendance at the evening presentation and “question and answer” session.

The point was fairly made (during the evening presentation) that this hardly represented a fair cross section of Tiree Public Opinion. Concern was also raised (by the fishermen present) that the introduction of a “Saltire Prize” zone immediately off shore to the North of Tiree was unacceptable without prior consultation. The speakers tried to explain that their presentation that evening was indeed an attempt to consult on such matters. This however was not considered convincing. Criticisms were also raised concerning the scope and nature of the material on view, i.e. it was “Scotland wide” whereas the people of Tiree were principally concerned with viewing, in much more detail, those aspects of the overall scheme which impacted on their island and its way of life.

These matters generally monopolised the discussion and led, in due course, to an agreement in principal that consideration be given to yet a further “meeting” but this time to be structured more as a “conference” where individual interest groups would be invited to attend. Marine Scotland indicated that they would be pleased to attend and were confident they could get the necessary authority so to do. They indicated however that they would look to the Trust (who were represented among those present) to set the agenda and identify the local delegates.

All of this seemed to meet with approval and we now await the outcome.

A series of written questions were noted (from NTA) and Marine Scotland said that, as they required to consult before responding, they would submit written answers following their return to Edinburgh.