

Draft Sectoral Marine Plan for Offshore Wind Energy (2019)

**Consultation Analysis Report
(December 2019 to March 2020)**

June 2020



Scottish Government
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Report prepared by:



For:



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1 Introduction

1.1 Background

- 1.1.1 The Scottish Government is committed to ensuring secure, reliable and affordable energy supplies, within the context of long-term decarbonisation of energy generation. The continued growth of the renewable energy sector in Scotland is an essential feature of the future clean energy system and a potential key driver of economic growth. As a nation with an abundance of renewable energy resources, opportunities exist not only to meet domestic needs, but also to export low carbon energy to the rest of UK and Europe.
- 1.1.2 To date, Scotland has seen a significant amount of offshore wind energy activity, with 14 offshore wind farms (including two floating wind farms) having received consent, six of which are currently operational, equating to a total generating capacity of just over 5 Gigawatts (GW). Our first Sectoral Marine Plan for Offshore Wind Energy (Blue Seas Green Energy) (“the 2011 Plan”) was adopted in 2011¹, with draft wind, wave and tidal plans subsequently produced in 2013².
- 1.1.3 Recent technological, policy, regulatory and market developments, such as the commitments outlined in the UK Offshore Wind Sector Deal³, the development of new technologies suitable for deployment in deeper water and the aspirations established in recent climate change legislation have presented the opportunity for Scottish Ministers’ to undertake a new strategic planning process.
- 1.1.4 In November 2017, Crown Estate Scotland (Interim Management) (“(CES)(IM)”) announced its intention to run a further seabed leasing round for commercial scale offshore wind energy projects in Scottish Waters. To inform the spatial development of this leasing round, Marine Scotland, as planning authority for Scotland’s seas, is required to undertake a planning exercise in accordance with relevant UK, European Union (EU) and Scottish legislation. This planning process will ensure that the spatial strategy is in place to support the forthcoming Crown Estate Scotland (CES) ‘ScotWind’ leasing round and enable the continued successful development of commercial-scale offshore wind. The planning process for the draft Sectoral Marine Plan for Offshore Wind Energy (“the draft Plan”) commenced in early 2018, following the process outlined in Figure 1, and builds upon the previous planning exercises (undertaken in 2011 and 2013). Consultation on the draft Plan took place between December 2019

¹ Scottish Government, Blue Seas Green Energy (March 2011) Available at:

<https://www2.gov.scot/Topics/marine/marineenergy/wind>

² Further information available here:

<https://www2.gov.scot/Topics/marine/marineenergy/Planning>

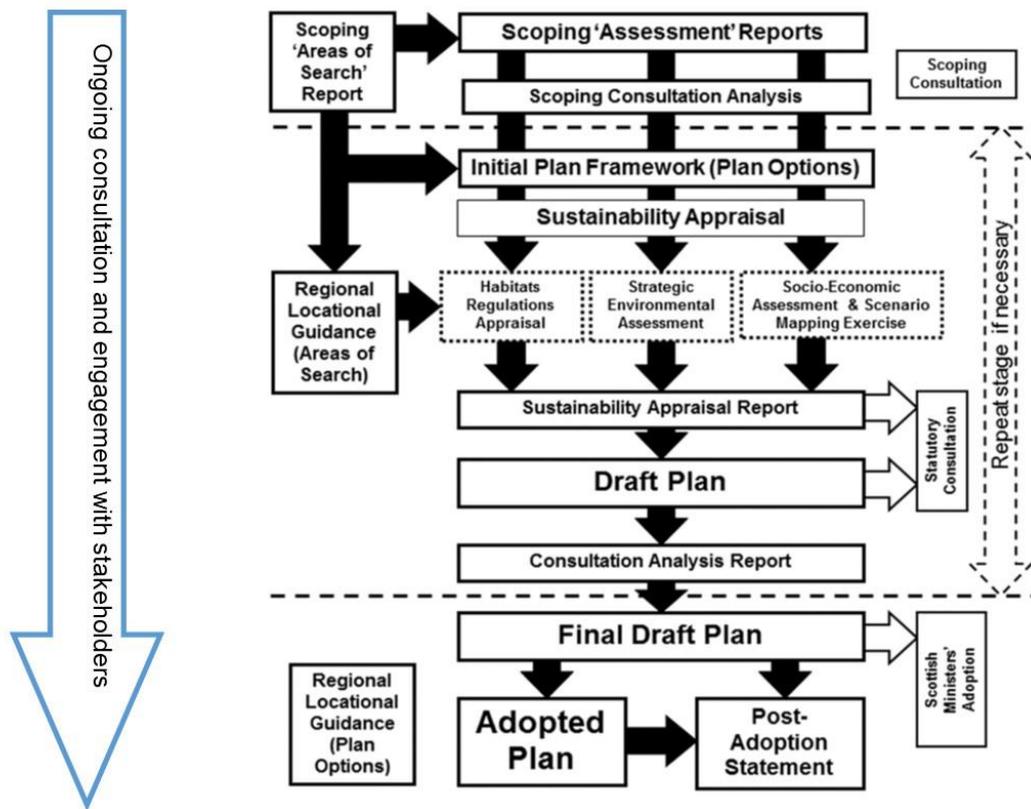
³ UK Offshore wind Sector Deal, Policy Paper 2020:

<https://www.gov.uk/government/publications/offshore-wind-sector-deal/offshore-wind-sector-deal>

to March 2020 and the outputs of this consultation exercises are outlined in this report.

- 1.1.5 The final Plan will provide the spatial framework for the first cycle of seabed leasing by Crown Estate Scotland (“CES”), which launched in June 2020

Figure 1 Planning process



1.2 Consultation

- 1.2.1 In June 2018, the Scottish Government consulted on a number of Areas of Search as part of the scoping stage of this planning process. The consultation ran for a period of five weeks from 13 June 2018 to the 18 July 2018
- 1.2.2 Following completion of the scoping consultation, Marine Scotland undertook extensive post-scoping engagement with stakeholders to further refine these Areas of Search. This led to the identification of Revised Areas of Search in early 2019, which took into account consultation feedback, new/additional datasets and commercial considerations outlined by renewable energy developers and membership organisations, which were then further refined to identify draft Plan Options (“DPOs”). The DPOs emerged through an examination of spatial data considerations in addition to advice and other related information provided by members of the Offshore Wind Strategic Environmental Assessment and Social and Economic Impact Assessment

Steering Groups, as well as wider stakeholder consultation. A summary of the scoping and post-scoping consultation can be found in the Consultation Analysis Report published in December 2019.⁴ The DPOs consulted upon are shown in Figure 2, below.

- 1.2.3 The draft Plan was published on 18 December 2019 and the consultation ran until 25 March 2020, a total of 14 weeks.
- 1.2.4 The draft Plan is accompanied by seven supporting documents;
 - Strategic Environmental Assessment Environmental Report (SEA);
 - Strategic Habitat Regulations Appraisal: Screening and Appropriate Assessment Information Report (HRA report);
 - Social and Economic Impact Assessment (SEIA);
 - Partial Equality Impact Assessment (EQIA);
 - Partial Islands Communities Impact Assessment (ICIA);
 - Draft Regional Locational Guidance (RLG); and
 - Sustainability Appraisal (SA).
- 1.2.5 The consultation contained 14 questions, seven on the draft Plan and a further seven questions on the suitability of the supporting assessment documents. The consultation questions are listed in Appendix A.
- 1.2.6 The draft Plan and supporting documents were made available on the Scottish Government website and supported by a series of 17 public events around Scotland during February and March 2020, with a further stakeholder event in London in March 2020. Further details regarding these events and the feedback received is provided at Section 5 and in Annex B of this report.
- 1.2.7 In addition, information regarding the draft Plan was presented and disseminated at a number of relevant meetings and conferences, including the Scottish Renewables' Offshore Wind Conference, Exhibition & Dinner (28 and 29 January 2020) and Regional Inshore Fisheries meetings (14 and 24 January 2020).

⁴ Available to view here: <https://www2.gov.scot/Resource/0054/00549055.pdf>

1.2.8 Additionally, engagement was undertaken with the following bodies and organisations:

- Scottish Natural Heritage;
- Royal Society for Protection of Birds (Scotland);
- Joint Nature Conservation Committee;
- Scottish Fishermen's Federation and Scottish White Fish Producers Association;
- Scottish Renewables;
- Argyll and Bute Council
- Comhairle nan Eilean Siar;
- Royal Yachting Association (Scotland); and
- Various renewable developers.

1.3 Analysis Method and Reporting

1.3.1 Responses were submitted via Citizen Space⁵ or via information submitted directly to Marine Scotland. Most responses were submitted electronically (i.e. submitted via Citizen Space or email) rather than by hard copy.

1.3.2 Summaries of the workshop discussions were also collated and incorporated into the plan review process. These are summarised in Section 5.2 and discussed in Appendix B.

1.3.3 The responses to the consultation question(s) in each document were logged in a customised database which enabled analysis to be undertaken by key themes, geographic scope (i.e. national and/or regional) and respondent type.

1.3.4 Unique responses (text) were categorised as 'standard' responses.

1.3.5 Where respondents submitted the same text or an individual responded multiple times, this was categorised as a 'non-standard' response.

1.3.6 Responses from organisations were assigned to sub-groups (organisation 'type') (Table 1). This enabled analysis of the types of organisations that had responded and whether there were differences or commonalities across the different types of organisations that had responded and also broken down into sectors to allow sectoral analysis.

1.3.7 Responses to each question(s) in each consultation document were examined and key themes and geographic scope were identified.

1.3.8 The key themes were looked at in relation to individuals and organisation groupings to ascertain whether any particular theme was specific to one particular group or whether it appeared in responses across groups.

⁵ <https://consult.gov.scot/>

1.3.9 Chapters two to nine document the substance of the analysis of the formal consultation and present the main themes and views expressed in responses.

1.4 Next Steps

1.4.1 The draft Plan will be reviewed in response to comments made during the consultation. In the event that substantial changes are required as a result of this consultation process, further assessment and consultation may be required.

1.4.2 The final Plan will be prepared and presented for approval and adoption by Scottish Ministers. The final Plan will be published along with relevant supporting information, such as an Appropriate Assessment and Post Adoption Statement, as soon as possible thereafter. The application window for the first cycle of ScotWind leasing will close after the publication of the final Plan (exact timescales will be determined in due course).

1.4.3 The final adopted Plan will be subject to review which will ensure that the Plan remains reflective of current scientific understanding and knowledge, as well as the wider regulatory and policy context.

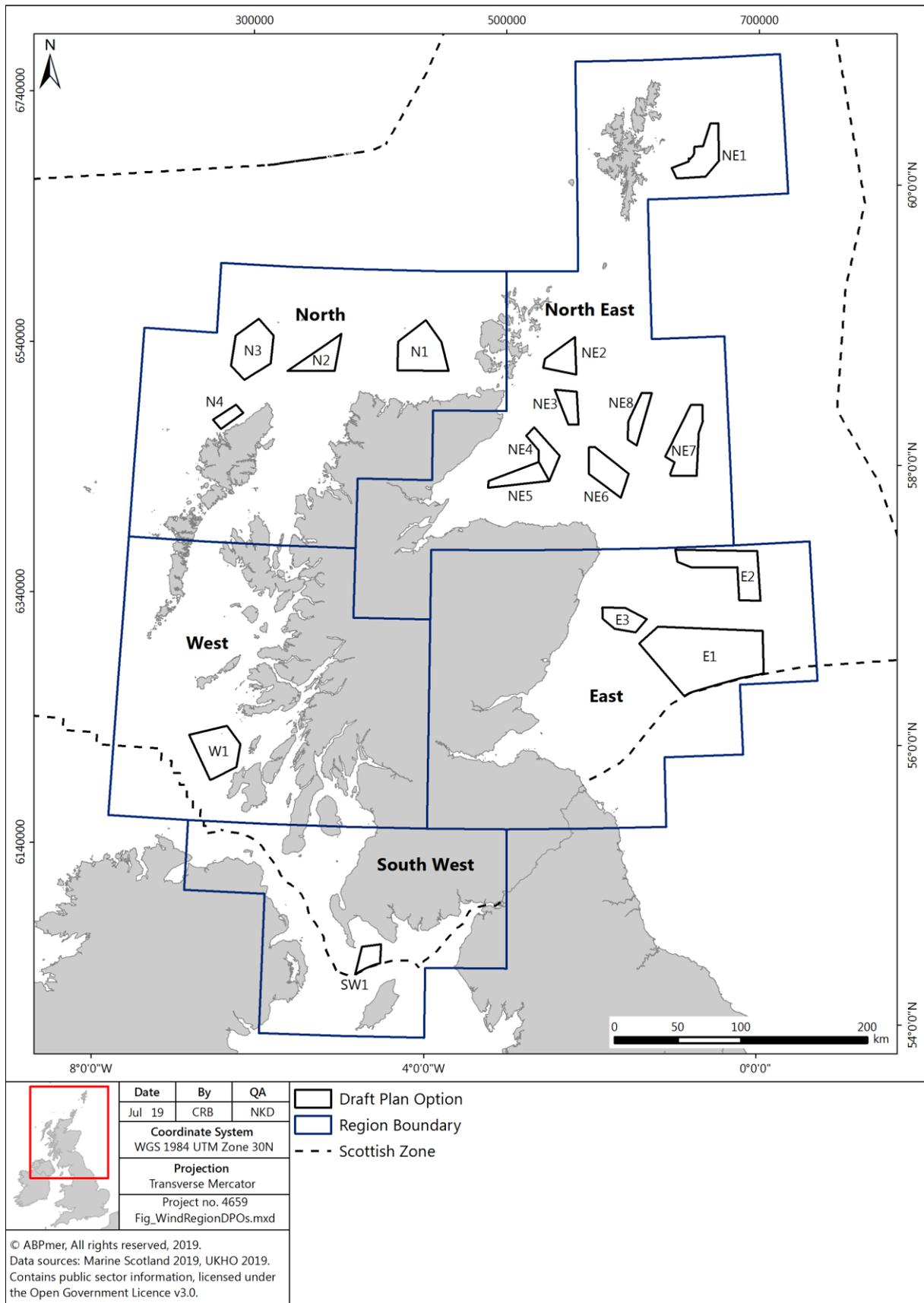


Figure 2 DPOs as consulted upon

2 Overview of Respondents

2.1 Respondent Profiles

- 2.1.1 In total, 195 responses were received representing 84 organisations (Listed in Appendix C) and 362 individuals. The 195 responses included 192 standard (unique) consultation responses and three (3) non-standard (duplicate) responses.
- 2.1.2 Two responses classed as representing individuals represented multiple people. One (1) represented three (3) people. The other (a larger petition) represented 250 separate signatories but was only applicable to a single question (Question 1, SW1).
- 2.1.3 In two (2) cases, an individual has submitted two responses on behalf of two (2) different organisations. In these cases the submissions were treated as separate submissions. In addition, in one (1) instance an individual responded twice with one (1) response on behalf of another individual. These have similarly been treated as two (2) separate submissions.
- 2.1.4 On three (3) occasions individuals submitted multiple responses with the same e-mail address (similar sentiment although slightly different in wording). In these instances the responses were merged and treated as a single response.
- 2.1.5 In one (1) instance multiple responses were received from the same name (or derivatives of) but with different e-mail addresses. It is understood that these are separate individuals although, given similar wording, there is the potential that some or all of these responses should be counted as a single response. These responses (five (5) in number) have been treated as separate. This represents approximately 1% of the total respondents and is therefore not considered likely to influence the results significantly.
- 2.1.6 For analysis purposes, responses from organisational stakeholders were assigned to sub-groups and / or sectors (see Table 1) enabling analysis of the types of organisations that had responded to each of the five consultation documents.

Table 1 Stakeholder types and sub-groups

Stakeholder Type	Stakeholder Sub-groups	No.	Sectors	No.
Organisation	Public body	24	Energy	25
			Commercial fisheries	8
	Energy company / developer / association	25	Ports & harbours	4
			Tourism and Recreation	3
			Carbon capture and storage	2
	Other commercial sector	19	Military defence	1
	Non-Governmental Organisation (NGO)	3	Oil and gas	2
			Power Interconnectors / telecoms	1
	Other	13	Shipping	1
			NA	37
Individual	Individual	362	Individual	362

2.2 Question Respondent Profile

2.2.1 The respondent profile for each question is shown in Table 2. The content of the responses is summarised in Sections 2.2.2 and 4.

Table 2 Overview of Context Report respondent groups

Respondent Groups	Responses Received
Respondent Groups – Question 1	
Individual	22
Organisation	
- Public body	10
- Energy company / developer / association	22
- Other commercial sector	10
- NGO	2
- Other	9
Total number of respondents	136

Respondent Groups	Responses Received
Respondent Groups – Question 2	
Individual	48
Organisation	
- Public body	6
- Energy company / developer / association	20
- Other commercial sector	9
- NGO	0
- Other	9
Total number of respondents	92
Respondent Groups – Question 3	
Individual	61
Organisation	
- Public body	9
- Energy company / developer / association	20
- Other commercial sector	11
- NGO	1
- Other	9
Total number of respondents	111
Respondent Groups – Question 4	
Individual	57
Organisation	
- Public body	8
- Energy company / developer / association	25
- Other commercial sector	10
- NGO	1
- Other	8
Total number of respondents	105

Respondent Groups	Responses Received
Respondent Groups – Question 5	
Individual	21
Organisation	
- Public body	9
- Energy company / developer / association	19
- Other commercial sector	6
- NGO	3
- Other	1
Total number of respondents	59
Respondent Groups – Question 6	
Individual	22
Organisation	
- Public body	7
- Energy company / developer / association	19
- Other commercial sector	7
- NGO	3
- Other	4
Total number of respondents	62
Respondent Groups – Question 7	
Individual	38
Organisation	
- Public body	14
- Energy company / developer / association	21
- Other commercial sector	10
- NGO	3
- Other	5
Total number of respondents	91

Respondent Groups	Responses Received
Respondent Groups – Question 8	
Individual	37
Organisation	
- Public body	12
- Energy company / developer / association	18
- Other commercial sector	9
- NGO	2
- Other	8
Total number of respondents	86
Respondent Groups – Question 9	
Individual	29
Organisation	
- Public body	12
- Energy company / developer / association	15
- Other commercial sector	
- NGO	3
- Other	8
Total number of respondents	74
Respondent Groups – Question 10	
Individual	42
Organisation	
- Public body	11
- Energy company / developer / association	18
- Other commercial sector	11
- NGO	2
- Other	8
Total number of respondents	92

Respondent Groups	Responses Received
Respondent Groups – Question 11	
Individual	29
Organisation	
- Public body	11
- Energy company / developer / association	13
- Other commercial sector	8
- NGO	0
- Other	7
Total number of respondents	68
Respondent Groups – Question 12	
Individual	28
Organisation	
- Public body	8
- Energy company / developer / association	16
- Other commercial sector	7
- NGO	0
- Other	6
Total number of respondents	65
Respondent Groups – Question 13	
Individual	9
Organisation	
- Public body	8
- Energy company / developer / association	10
- Other commercial sector	5
- NGO	0
- Other	7
Total number of respondents	39

Respondent Groups	Responses Received
Respondent Groups – Question 14	
Individual	25
Organisation	
- Public body	9
- Energy company / developer / association	11
- Other commercial sector	7
- NGO	1
- Other	7
Total number of respondents	60

2.2.2 Key themes that emerged from the responses to the questions are outlined below in Sections 2.2.2 and 4.

3 Draft Plan

3.1 Introduction

3.1.1 The consultation posed seven questions to understand the stakeholder and public level of support for the plan. The questions were:

- Do you support the selection of the draft Plan Options?
- Do you agree with the definition of commercial scale offshore wind farm projects as being projects being capable of generating over 100 Megawatt (MW) of electricity? Do you think this level should be lower or higher?
- Do you agree that the scientific evidence presented demonstrates that DPOs NE2-6 and E3 are subject to high levels ornithological constraint and, therefore, the mitigation measures outlined in the draft Plan should be applied to these DPOs?
- Do you agree that the scientific evidence presented demonstrates the requirements for further regional-level survey work within DPOs E1 and E2?
- Do you have any comments regarding the proposed approach to iterative plan review?
- Do you have any comments regarding the proposed formation and role of the Advisory Group?
- Do you have any further comments or points that you think should be taken into account in the plan?

3.1.2 The responses to these questions are discussed in the following sections.

3.2 Question 1 – “Do you support the selection of the following draft Plan Options?”

3.2.1 The total number of responses in relation to each DPO was reasonably consistent ranging between 97 and 102, with the exception of SW1 for which 400 responses were received. Information on the number of responses and level of support for each DPO is provided in Table 3 below. Figure 3 represents numbers of responses for all DPOs and Figure 4 represents response type as a percentage of total responses at each DPO.

3.2.2 Support for each DPO was broadly consistent with 33 to 41 respondents showing broad support (strongly support or somewhat support) for each DPO. For most DPO this corresponded to 34% to 41% of the total respondents. The exception was for SW1 where only 10% of respondents supported the DPO.

3.2.3 Opposition to sites was more variable with broad opposition (somewhat oppose or strongly oppose) ranging between 19 (for E2) and 328 (for SW1), although excluding SW1 the next highest number of opposition responses was 39 (NE7). At SW1 the opposition responses were 82% of total responses, which is in part

due to a petition (250 signatures) but even without the petition there were still 78 responses opposing the DPO.

- 3.2.4 For this question there were a significant number of responses which represented neither support nor oppose for all DPOs, numbering between 22 and 44 responses (not including responses which left the question blank) and making up generally between 20% and 40% of total responses (with the exception of SW1, 34 'neither support nor oppose' responses, 9%).
- 3.2.5 Reasoning given for opposition to DPOs varied between the DPOs, but included a variety of social, economic and environmental factors. The most commonly referenced were concerns regarding:
- impacts on fisheries (43 responses)
 - impacts on biodiversity receptors, particularly bird features (41 responses)
 - impacts on tourism (26 responses)
 - impacts on landscape / seascape (20 responses)
 - safety for recreational / commercial shipping (11 responses)
- 3.2.6 Smaller numbers of responses also referenced other environmental and socio-economic topics, including population effects, impacts on ports and harbours, impacts on the military, cultural heritage and marine geology and coastal processes.
- 3.2.7 Five (5) commercial fisheries sector organisation responses were received. Organisations in the commercial fisheries sector were more likely to oppose DPOs although this was not universal with the response 'somewhat support' selected by some organisations for some DPOs. Two (2) responses (Scottish Fishermen's Federation (SFF) and Scottish White Fish Producers Association (SWFPA)) proposed changes to the areas on behalf of their members (Figure 5).
- 3.2.8 Conversely, albeit perhaps unsurprisingly, responses from the Energy sector were supportive across the board although not all organisations responded to each DPO individually.

Table 3 Summary of support for DPOs

DPO	Strongly Support	Somewhat support	Neither support nor oppose	Somewhat oppose	Strongly oppose
SW1	30	8	34	7	321
W1	28	8	43	4	19
N1	28	8	37	4	23
N2	27	7	41	6	16
N3	28	9	39	4	17
N4	23	10	44	5	15
NE1	26	13	38	1	21
NE2	28	11	32	2	30
NE3	28	13	28	4	27
NE4	28	8	28	5	33
NE5	25	11	29	3	34
NE6	27	11	26	5	28
NE7	30	7	22	7	32
NE8	30	9	25	6	30
E1	27	10	35	7	19
E2	28	11	40	4	15
E3	22	14	43	3	16

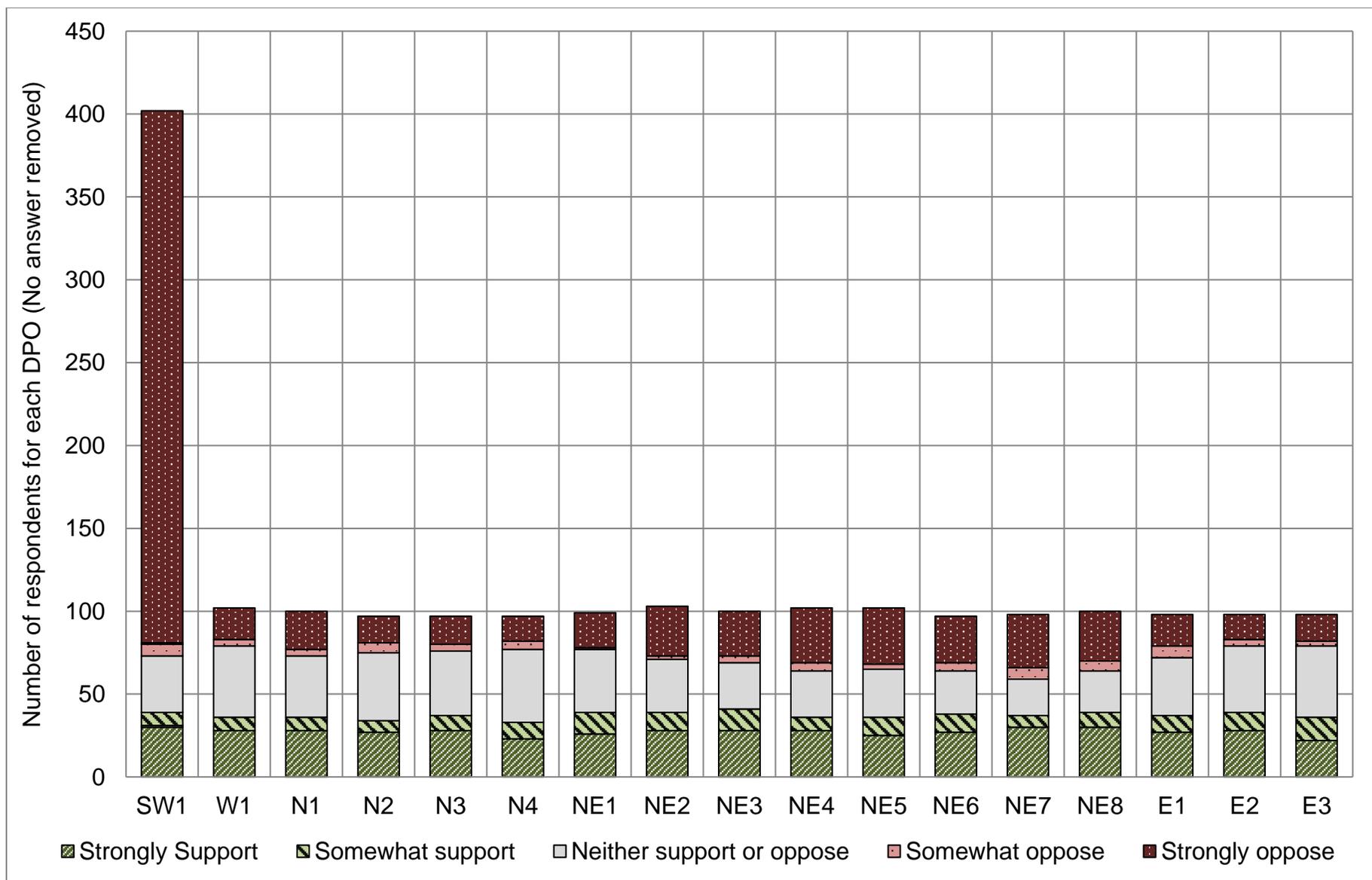


Figure 3 Support / Opposition for DPOs - Numbers

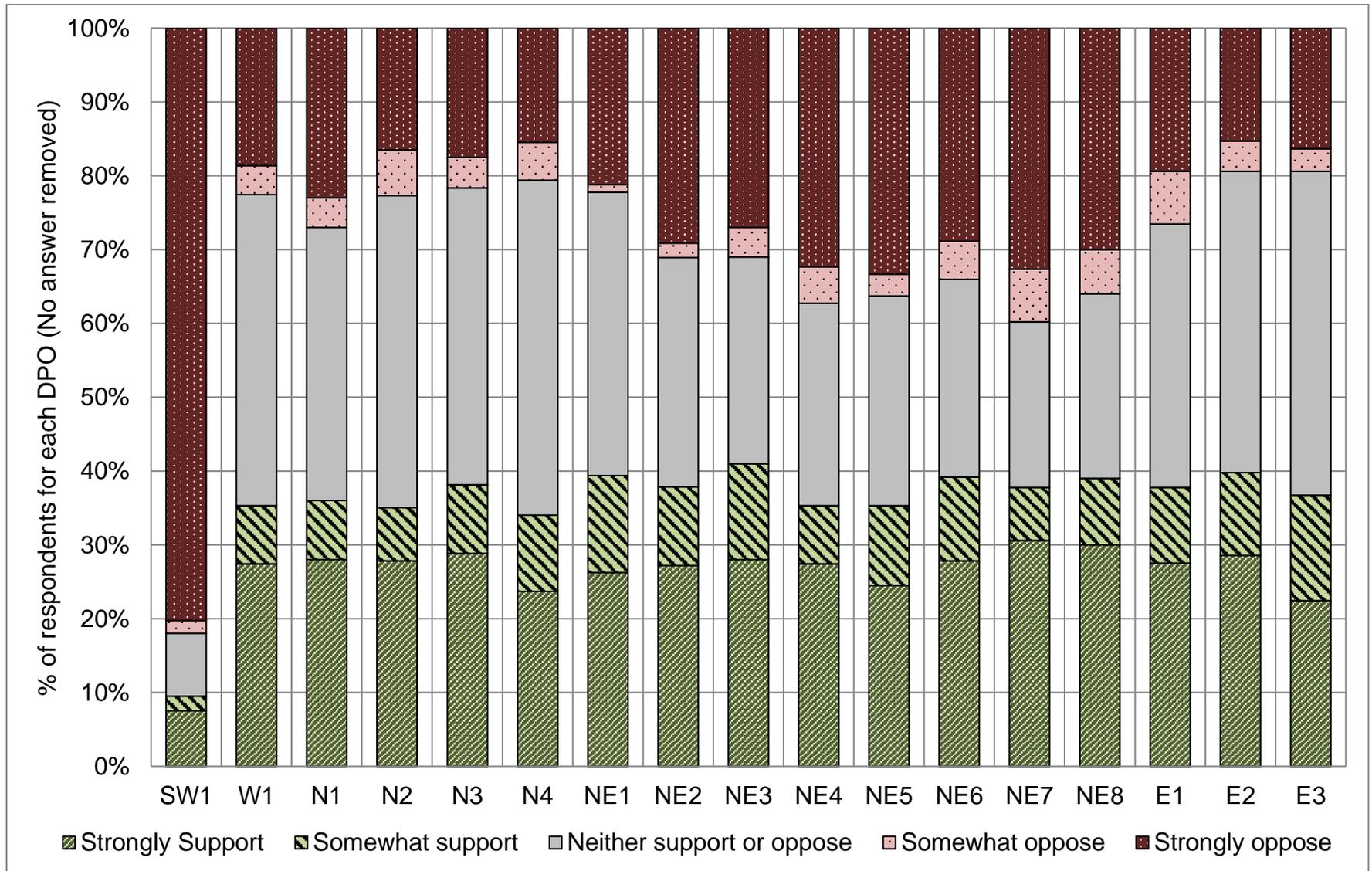


Figure 4 Support / Opposition for DPOs (%)

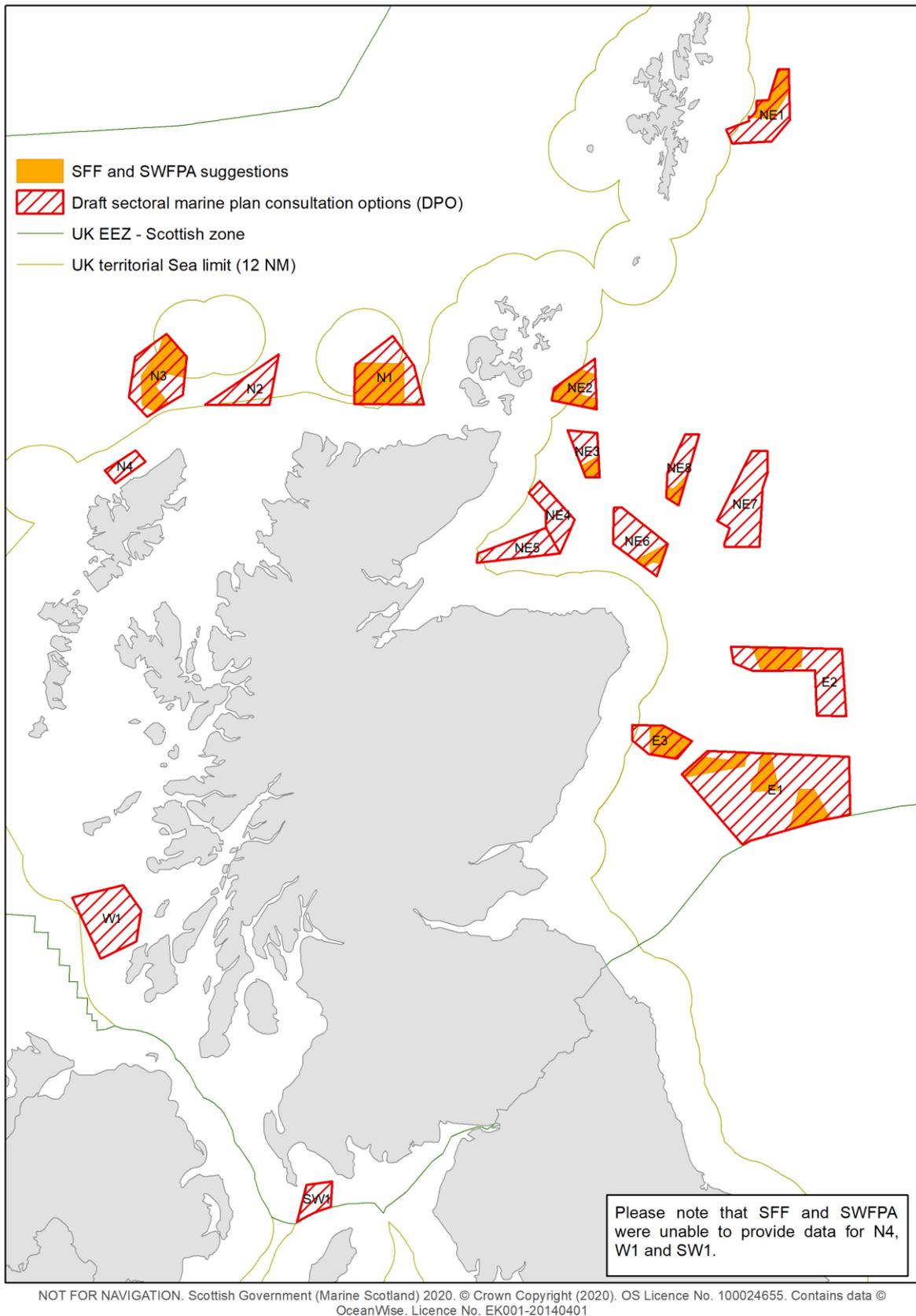


Figure 5 Modification proposed by fisheries response

3.3 Question 2 – “Do you agree with the definition of commercial scale offshore wind farm projects as being projects being capable of generating over 100 MW of electricity?”

- 3.3.1 There was uncertainty in responses to the question, with a number of responses suggesting that they were not well placed to answer, or responses indicating that the consultee was not clear about the implications of changing the definition of commercial scale developments. Nine (9) respondents proposed lowering the definition as they disagreed with any development, while six (6) suggested raising the definition as they supported all development.
- 3.3.2 18 responses noted that they were not concerned with the definition as long as the scrutiny applied to the assessment process was the same for all applications. One (1) response disagreed with the term ‘commercial’ and felt that projects should be classified as small, medium or large.
- 3.3.3 Table 4 summarises the results of those consultees who responded that the definition of commercial scale projects should be higher or lower than 100 MW. Where respondents stated that the level should be lower or higher, the reasons are discussed below.

Table 4 Summary of agreement with the definition of commercial scale offshore wind farm projects

Lower (<100 MW)	As is (100 MW)	Higher (>100 MW)	Not answered
27	30	35	101

- 3.3.4 The breakdown of organisational sectors in the responses is shown in Figure 6. Of the 35 total responses proposing a higher definition 21 were organisational, with 19 of these from the Energy sector. The principal reasoning given for an increase in the definition by the Energy sector was to support the development of larger demonstration projects, which in order to test specific array opportunities might need to be greater than 100MW in size. The most commonly proposed definition was up to 300 MW.
- 3.3.5 The only organisational responses supporting a lower definition were within the Commercial Fishing sector, emphasising that loss of fishing grounds was possible at any scale, and that cumulative effects should be considered irrespective of whether wind farms were considered to be of commercial scale.
- 3.3.6 Those organisations that favoured retaining the current definition generally considered that the scale of a 100 MW array had potential for significant effects and as such consideration as commercial would ensure robust assessment. Some questioned the validity of any reasoning for a ‘test’ or demonstration wind farm to be greater than 100 MW in scale.

3.3.7 Of the six public bodies which responded, although not represented in the graphic below, four (4) local councils favoured retaining the current definition whilst one (1) local council and National Grid favoured a lower definition.

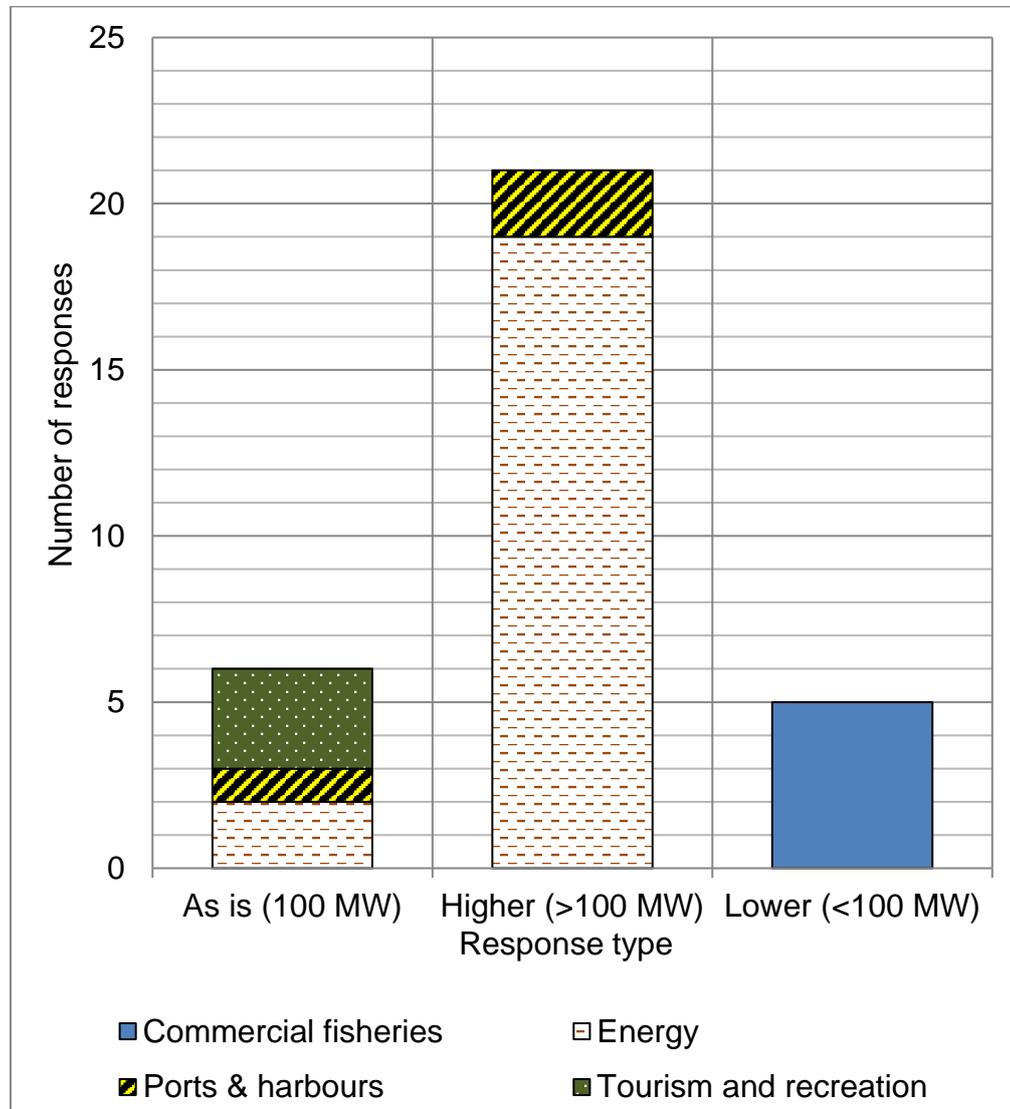


Figure 6 Organisational breakdown of responses to Question 2

3.4 Question 3 – Do you agree that the scientific evidence presented demonstrates that DPOs NE2-6 and E3 are subject to high levels ornithological constraint and, therefore, the mitigation measures outlined in the draft Plan should be applied to these DPOs?

3.4.1 There were a total of 38 definitive answers to this question with the vast majority of responses either selecting ‘don’t know’ (73 responses) or providing no answer. Of the 38 responses, 21 agreed, whilst 17 disagreed, with the presented scientific evidence and mitigation measures.

- 3.4.2 Of the 17 who disagreed five (5) were individuals, with the remaining 12 linked to the Energy sector (Table 5). Only two (2) of the individual responses provided justification, linked to balancing climate change impacts against perceived lower impacts from offshore wind development. These two (2) respondents felt that changes in sand-eel distribution / changes in migration patterns expected as a result of climate change would make protection through this mitigation redundant. Of the 12 responses from the Energy sector, nine (9) considered that NE6 specifically should be removed from the mitigation. However, these responses often referenced that NE6 was beyond the published 60km mean max foraging range for kittiwake, a range which has subsequently (during the consultation period) been revised upwards by Woodward *et al* (2019) to 156 km which would now encompass NE6. Eight (8) of the responses requested that greater emphasis be provided to the ‘built out’ or recorded impacts of offshore wind projects rather than reliance on the modelled outcomes of assessments for currently consented sites. They considered that this would reduce the estimated cumulative impact. Six (6) responses referenced the decisions to consent all current sites with a conclusion of no Adverse Effect On Integrity (AEOI), and therefore considered there to be remaining environmental capacity.
- 3.4.3 The 21 respondents who supported the mitigation were from a wider spectrum of stakeholders, representing commercial fisheries, energy, ports and harbours, individual responses and organisations without sector specific remits (NA) (Table 5). These included nature conservation bodies (SNH / JNCC). Comments submitted alongside these responses generally supported the scientific evidence, although in three (3) responses from individuals it was suggested that the mitigation measures should be extended to include SW1. The Royal Society for the Protection of Birds (RSPB) Scotland, whilst supportive of the need for further spatial planning proposed by the measures considered that further sites should be incorporated into the mitigation measures (NE7, NE8, E1 and E2) and requested additional clarification.

Table 5 Agreement with scientific evidence for DPOs NE2-6 and E3

Sector	Yes	No	Don't know
Individual	9	5	46
Commercial fisheries	1	-	6
Energy	3	12	6
NA (non-sector specific)	7	-	10
Ports & harbours	1	-	2
Shipping	-	-	1
Tourism and recreation	-	-	2
Total	21	17	73

3.4.4 Some comments, included in responses both for and against the mitigation, requested further clarification about the process / timelines for review, and two responses considered that other receptors should also be used to determine mitigation (herring spawning grounds / marine mammal receptors).

3.4.5 Comments regarding the potential for application of Article 6(4) derogation are discussed under the HRA in section 4.3 below.

3.5 Question 4 “Do you agree that the scientific evidence presented demonstrates the requirements for further regional-level survey work within DPOs E1 and E2?”

3.5.1 The breakdown of answers to this question are similar to those for Question 3, above, with ‘No’ responses from 6 individuals and 12 organisations from the Energy sector and 23 ‘Yes’ responses including a wider range of individuals, commercial fisheries, energy and non-sector specific organisations (Table 6).

Table 6 Agreement with scientific evidence for DPOs E1 and E2

Sector	Yes	No	Don't know
Individual	11	6	39
Commercial fisheries	2	-	5
Energy	4	12	6
NA (non-sector specific)	6	-	9
Ports & harbours	-	-	3
Tourism and recreation	-	-	2
Total	23	18	64

3.5.2 Individual responses disagreeing with the proposed mitigation generally refer to support for wind farms and concerns that the requirements will lead to delays disproportionate to the risk. Energy responses opposing the measures are generally similar with eight (8) referring to their view that as no definitive AEOI is identified, no further data collection is necessary beyond that required for project level survey and assessment.

3.5.3 Supportive responses can broadly be broken down into two categories, the first supporting increased ornithological data collection to support future development in E1 and E2, the second proposing that further evidence is required for any future offshore wind development (5 individual responses).

3.5.4 Energy sector responses, including both those supporting and opposing the requirement for further survey, recognise the benefits of additional data in

underpinning accurate assessments, although they also requested additional clarity regarding the process and timescales for addressing evidence gaps.

- 3.5.5 Although all three organisations concur with the requirement for further data collection, RSPB Scotland, SNH and JNCC did not select a clear answer to the question. JNCC and RSPB Scotland consider that E1 and E2 should be included in the temporal mitigation discussed under question 3.

3.6 Question 5 – “Do you have any comments regarding the proposed approach to iterative plan review?”

- 3.6.1 All but one of the 59 responses to this question were broadly supportive of IPR, with the single objection related to concerns from an individual regarding introduction of delays to the deployment of offshore wind. Table 7 shows the sectoral breakdown of the responses.
- 3.6.2 Whilst broadly supportive, 22 of the responses across multiple industries and individuals specifically request that the process be as transparent as possible. The energy sector raised concerns regarding the scope of IPR, and whether this could lead to areas previously unconstrained becoming constrained in future. There was concern that this would lead to an unacceptable increase in project risk.
- 3.6.3 In general, almost all respondents who commented were keen that further information regarding the scope of IPR (all sectoral responses considered that this should include their sector), and confirmation as to how it would be applied in practice should be available. A number of responses also queried how IPR will address the mitigation measures raised in Questions 3 and 4.
- 3.6.4 A small number of comments identified the potential for integration of IPR into wider marine planning processes.

Table 7 Sectoral breakdown of respondents to Question 5

Sector	Number of responses
Individual	21
Carbon capture and storage	1
Commercial fisheries	4
Energy	20
NA (non-sector specific)	12
Shipping	1
Total	59

3.7 Question 6 – “Do you have any comments regarding the proposed formation and role of the Advisory Group?”

3.7.1 Where responses to this question (broken down by sector in Table 8) addressed the formation of the Advisory Group they were broadly supportive. However, numerous comments were made regarding the composition of the group, thirteen of which requested additional clarity regarding membership, with general consensus that a wide range of expertise from different sectors should be drawn upon. Specifically, the following representation was proposed:

- Local representation
- Environmental representation
- Scottish Government representation
- Industry professionals
- Commercial fisheries representation
- Royal Yachting Association (RYA)
- Offshore wind farm developer representation
- Technical experts beyond the membership of the ScotMER Ornithology Receptor Group
- SFF
- Oil and Gas Authority
- HM Coastguard
- SNH
- RSPB Scotland
- Wild Fish species experts
- JNCC
- Local council representation
- Wider spatial representation (UK wide / France)
- Representation from any impacted sector

3.7.2 In addition, numerous responses queried the scope of the Advisory Group, with 14 responses requesting further clarity, and 25 responses raising concerns that the Advisory Group as proposed appeared too focused on ornithological impacts. Two (2) responses proposed that it may be appropriate to have a sub-group for ornithological discussions.

3.7.3 One (1) response suggested that the advisory group should form part of the more general marine planning process and that existing groups should be approached rather than establishing a new process while one (1) organisational response considered that all data gaps should be filled prior to the adoption of the Sectoral Marine Plan (SMP).

Table 8 Sectoral breakdown of respondents to Question 6

Sector	Number of responses
Individual	22
Carbon capture and storage	1
Commercial fisheries	5
Energy	20
NA (non-sector specific)	11
Power Interconnectors / telecoms	1
Tourism and recreation	2
Total	62

3.8 Question 7 – “Do you have any further comments or points that you think should be taken into account in the plan?”

3.8.1 Responses to this question were broken down into comments at a national level versus comments aimed at a purely regional level (Table 9). Respondents raised a number of specific issues, alongside broader issues that are applicable to specific parts of the assessments (SEA / SEIA / RLG / HRA). Where comments are applicable to these documents, they are considered in Section 4.

Table 9 Sectoral and geographic breakdown of responses to Question 7

Sector	Number of responses						
	National	South West	West	North	North East	East	Total
Individual	8	8			4	1	21
Carbon capture and storage	1	-	-	-	-	-	1
Commercial fisheries	4	-	-	-	1	-	5
Energy	18	-	-	-	-	1	19
NA	13	2	1	1	1	-	18
Oil and gas	1	-	-	-	-	-	1
Ports & harbours	1	-	-	-	-	-	1
Tourism and recreation	1	1	-	-	-	-	2
Total	46	11	1	1	7	2	68

- 3.8.2 At a national scale the eight (8) individual results varied significantly but raised potential for co-installation of offshore wind with aquaculture (seaweed / shellfish) or alongside hydrogen production facilities rather than grid connection and two (2) responses identified the potential value of decarbonisation in communities local to projects. One (1) response requested project specific geotechnical survey over multiple diurnal periods.
- 3.8.3 Key points raised in organisational responses addressing a national scale included:
- Request for clarification as to whether the national, regional and DPO specific scenarios used throughout the assessments should be considered a cap (10 responses)
 - Request for clarification as to the use of 5MW/km² installed capacity density assumption. (7 responses)
 - Clarification as to the potential for a developer to follow the Article 6(4) derogation route under the Habitats Regulation if it was not possible to conclude no adverse effect on integrity (NAEOI) at project level (4 responses). Note – this point is also raised throughout the responses received to a number of other questions
 - Consideration of onshore grid / grid connections (3 responses)
 - Request for clarification about whether offshore wind and fishing activity can be co-located (3 responses)
 - Consideration of the impacts on ports / harbours (2 responses)
 - Concerns regarding risks to development in sites exposed to harsh wave climates (1 response)
 - Consideration of transboundary effects (2 responses)
 - Request for clarification about the process used to refine previous Areas of Search (AoS) into the DPOs presented in the plan (1 response)
- 3.8.4 In SW region the points raised were principally related to topics to be raised against the SEA (navigational safety for recreational boating, biodiversity concerns, landscape issues) and SEIA (impact on tourism).
- 3.8.5 The single response related solely to the W region highlighted the importance of ensuring local bases for operation and maintenance activities to secure long term local economic benefits.
- 3.8.6 The one (1) response in the N region supported development and the output of the marine planning process, including expressing confidence in the potential for the measures identified to successfully mitigate impacts.
- 3.8.7 Five (5) of the six (6) responses for the NE region were associated with fishing and reiterated concerns regarding loss of fishing areas.
- 3.8.8 The other response identifies that parts of NE1 fell within the remit of the Shetland Islands Council and recommended that further consideration be given to how potential works orders required from the Council may be coordinated

with other required consents. The response proposed further consultation with Shetland Islands Council prior to plan acceptance.

- 3.8.9 Two (2) comments were made with a focus on the E region, one raised points already considered in questions 4, 5 and 6 above. The other identifies potential for increased cargo and passenger trade routes between Scotland and Scandinavia in the light of Brexit and suggests that these are considered.

4 Sustainability Appraisal

4.1 Introduction

4.1.1 The consultation posed seven questions, one for each of the seven supporting sustainability appraisal documents. These questions were:

- Do you have any comments on the Strategic Environmental Assessment Environmental Report?
- Do you have any comments on the Habitat Regulations Appraisal?
- Do you have any comments on the Social and Economic Impact Assessment?
- Do you have any comments on the draft Regional Locational Guidance?
- Do you have any comments on the Sustainability Appraisal report?
- Would you add or change anything in the partial Equality Impact Assessment?
- Would you add or change anything in the partial Islands Communities Impact Assessment?

4.1.2 The responses to each are summarised below.

4.1.3 Across all questions discussed below 15 responses from individuals refer their answers to the views of the SFF and SWFPA, discussion of which is covered through discussion of the organisational responses.

4.2 Question 8 – “Do you have any comments on the Strategic Environmental Assessment Environmental Report?”

4.2.1 Of the 84 responses received to question 8, 12 stated that they did not have any comment to make. Table 10 breaks down the responses by sector.

4.2.2 Of the 18 individuals who made specific comment (excluding the 15 individuals who refer their answers to the SFF / SWFPA comments), four (4) were specifically focussed on the SW region. Two (2) considered visual impacts in this area to be the constraining factor, one (1) highlighted the importance of transboundary data sharing whilst one (1) raised concerns that some potential impacts on bird features from development in SW1 were under-assessed.

4.2.3 At a national scale a further two (2) individuals highlighted visual effects or more widely all impacts and their subsequent impacts to tourism as the most significant risk. Three (3) responses agreed with the conclusions of the SEA, while two (2) considered that fishing grounds had not been sufficiently taken into account. Three (3) responses raised concerns regarding the impact of piling and construction on crabs, mackerel and marine mammals but did not comment on the assessment within the report. Two (2) further responses did not comment on the outcome of the assessments but considered that impacts on environmental receptors were significant.

- 4.2.4 Within the organisational responses, 11 from the Energy sector considered that there is a lack of information regarding reasonable alternatives, including detailed assessment of the 'do nothing' alternative and rationale for selection of DPOs. A further three (3) from the energy sector requested additional detail on the process used to determine the maximum development scenarios.
- 4.2.5 In addition to the 12 responses which stated that they did not have comment to make, six (6) responses, including statutory nature conservation bodies, across sectors broadly agreed with the conclusions of the SEA and / or the requirements outlined for further project assessment. Two referred specifically to SW1 and considered that development in this DPO is likely to cause a significant adverse effect. Further points raised by small (one (1) or two (2)) numbers of respondents are:
- Consideration should be given to the need for further assessment of grid connection infrastructure (subsea cabling / onshore development)
 - Risks to aviation should be managed at a policy level.
 - Further technology specific detail would provide greater confidence in the assessment.
 - Additional project level mitigation measures could be identified within the assessment.
 - New data is available to support assessment of landscape / seascape issues, (considered to be under-assessed at some sites).
 - Additional data on migratory fish (specifically Atlantic Salmon) is provided regarding migratory routes and potential visual disturbance.
 - Consideration that additional data is required to support the assessment.

Table 10 Sectoral breakdown of respondents to Question 8

Sector	Number of responses		
	No comment	Commented	Total
Individual	3	33	36
Commercial fisheries	-	6	6
Energy	3	16	19
NA	4	16	20
Ports & harbours	1	-	1
Shipping	1	-	1
Tourism and recreation	-	3	3
Total	12	74	86

4.3 Question 9 – “Do you have any comments on the Habitats Regulations Appraisal?”

- 4.3.1 Of the 74 responses received to question 9, 15 stated that they did not have any comment to make. Table 11 breaks down the responses by sector.
- 4.3.2 Of the ten (10) responses from individuals who made specific comments on the HRA, one (1) agreed with the outcome of the assessment, two (2) considered additional protection was required, one (1) requested additional consideration of fisheries interests, three (3) considered that additional assessment of SW1 was required due to ornithological, marine mammal and Site of Special Scientific Interest (SSSI) constraints and one (1) highlighted the potential impact on receptors from development in W1.
- 4.3.3 Eight (8) organisational responses to question 9, including statutory nature conservation bodies stated that they concurred with or broadly agreed with the conclusions of the HRA, in some cases whilst offering additional comments. Five (5) organisations from the energy or commercial fishing sectors questioned the outcome of the assessment. Nine (9) responses from the energy sector requested that consideration should be given to the decisions taken to consent offshore wind projects to date with the competent authorities concluding no AEOI. Five (5) responses, again from the Energy sector, requested clarification about the potential for individual projects to progress by means of derogation under Article 6(4) of the Habitats Directive.
- 4.3.4 Five (5) organisational responses identified that they considered there to be further assessment required for migratory birds, three (3) of which specifically discuss potential risks arising from development in SW1.
- 4.3.5 Five (5) organisations highlighted the requirement for HRA updates to be undertaken upon receipt of updated evidence, three (3) of which provided reference to specific new evidence they consider should be included:
- updated bird foraging ranges (Woodward *et al.*, 2019) (2 responses)
 - ‘as-built’ data (as opposed to the outcome of assessments / modelling)
- 4.3.6 Five (5) organisations recommended that a review of the mitigation presented was required, to ensure relevance and to clarify the extent to which projects might be required to adhere rigidly to the proposed mitigation measures.
- 4.3.7 Two (2) comments were raised regarding impacts on fish, one (1) focused on potential impacts on herring spawning grounds and sought assurance that these would be protected, whilst the other requested further consideration was given to potential impacts on migratory fish.

Table 11 Sectoral breakdown of responses to Question 9

Sector	Number of responses		
	No comment	Commented	Total
Individual	4	25	29
Commercial fisheries	-	4	4
Energy	3	14	17
NA	4	16	20
Ports & harbours	1	-	1
Shipping	1	-	1
Tourism and recreation	2	-	2
Total	15	59	74

4.4 Question 10 – “Do you have any comments on the Socio-Economic Impact Assessment?”

- 4.4.1 Of the 92 responses received to question 10, four (4) stated that they did not have any comment to make. Table 12 breaks down the responses by sector.
- 4.4.2 Within the individual responses, six (6) (in addition to those referencing SFF / SWFPA comments) considered that the impact on fisheries was underestimated, although conversely, one (1) response posited that the emotional attachment to fishing might outweigh the economic benefit.
- 4.4.3 Nine (9) comments referenced potential negative impacts associated with the loss of tourism revenue, seven (7) of which specifically highlighted concerns regarding potential impacts from development in SW1, and one (1) highlighted the potential for impacts from development in W1.
- 4.4.4 Seven (7) responses highlight the potential for benefits from development of offshore wind through employment, cheaper electricity or additional benefits from co-location with hydrogen generation. One (1) of these responses noted that a training programme was likely to be required to support job creation.
- 4.4.5 There were 45 organisational responses to the SEIA, which represent a range of sectors. Six (6) responses broadly agreed with the outcome of the SEIA or concurred that project level assessment would be important in determining potential project specific impacts. One (1) additional response identified the importance of early consideration of subsea cabling in a project lifecycle. Four (4) responses highlighted tourism as a specific concern, although one (1) local authority response specifically referring to N4 considered that the potential impacts were likely to have been overstated. Eight (8) responses specifically addressed SW1, noting that they considered the costs to outweigh the benefits and additionally questioned the validity of the benefits identified. Three (3) responses identified risks to recreational boating and associated navigational

safety as key concerns, whilst one (1) indicated that additional consideration should be given to potential impacts on ferry routes.

- 4.4.6 There was disagreement between the fisheries sector and Energy sector about the potential impacts to commercial fisheries. The commercial fisheries sector considered impacts to be either correct (but significant) or understated based on anecdotal / additional evidence (11 responses from fisheries / local council representation) whilst the Energy sector considered fisheries impacts to be significantly overestimated due to incorrect assumptions (16 responses). The key assumption challenged by the Energy sector is that in a worst case scenario fisheries would be permanently excluded from a development and that the fishing effort would be lost rather than displaced. In addition, two (2) responses from the Energy sector requested clarification about the policy assumption that the Energy sector would be required to address all costs to the aviation sector for radar replacement going forwards.
- 4.4.7 One response from the Carbon Capture and Storage (CCS) sector considered that the assessment underestimated interactions between the sector and offshore wind.

Table 12 Sectoral breakdown of responses to Question 10

Sector	Number of responses		
	No comment	Commented	Total
Individual	-	41	41
Carbon capture and storage	-	1	1
Commercial fisheries	-	7	7
Energy	2	17	19
NA	2	16	18
Ports & harbours	-	1	1
Power Interconnectors / telecoms	-	1	1
Shipping	-	1	1
Tourism and recreation	-	3	3
Total	4	88	92

4.5 Question 11 – “Do you have any comments on the draft Regional Locational Guidance?”

- 4.5.1 Of the 68 responses received to question 11, 19 stated that they did not have any comment to make. Table 13 breaks down the responses by sector.
- 4.5.2 In general, responses from individuals making specific comments focussed on the potential impacts on visual amenity and tourism (three (3) responses), the

importance of stakeholder engagement (one (1) response) and fisheries (one (1) response). Three (3) responses supported the format and commented on the usefulness of the RLG.

4.5.3 Six (6) organisational responses stated they were happy with the outputs presented in the RLG. Responses from organisations generally focused on the inclusion of additional sector specific detail, with over half (14 responses) providing additional information for consideration across the following topics:

- Carbon capture and storage
- Ports and harbours (particularly with regards to supporting offshore wind development)
- Migratory birds
- Migratory fish
- Defence
- Fisheries
- Recreational angling
- Presence of radioactive particles from Dounreay in the North region
- The cruise industry

4.5.4 Six responses noted the significant potential for visual impacts in the SW region, whilst four (4) responses from the energy sector and one (1) from the commercial fisheries sector requested clarification on the selection process for the DPOs.

Table 13 Sectoral breakdown of responses to Question 11

Sector	Number of responses		
	No comment	Commented	Total
Individual	6	23	29
Carbon capture and storage	-	1	1
Commercial fisheries	1	3	4
Energy	7	6	13
NA	4	13	17
Ports & harbours	-	1	1
Shipping	-	1	1
Tourism and recreation	1	1	2
Total	19	49	68

4.6 Question 12 – “Do you have any comments on the Sustainability Appraisal Report?”

4.6.1 Of the 65 responses received to question 12, twenty (20) stated that they did not have any comment to make. Table 14 breaks down the responses by sector.

Table 14 Sectoral breakdown of responses to Question 12

Sector	Number of responses		
	No comment	Commented	Total
Individual	4	23	27
Commercial fisheries	1	4	5
Energy	6	10	16
NA	7	6	13
Ports & harbours	1	-	1
Shipping	-	1	1
Tourism and recreation	1	1	2
Total	20	45	65

4.6.2 A number of the comments made by individuals in relation to the Sustainability Appraisal are repeated from those made for the individual assessments. Additional comments from individuals include reiteration of the impacts on visual amenity (two (2) responses); and consideration that the assessments as a whole do not sufficiently assess impacts on fisheries.

4.6.3 Organisational responses similarly reflect a number of comments raised by respondents on Questions 8, 9 and 10. Broadly similar points raised included:

- Impacts on tourism;
- Visual impact;
- Impacts on a SSSI (SW1);
- Impacts on recreational boating (navigational safety);

4.6.4 In addition, two comments were raised which although not specific to the Sustainability Appraisal were not raised elsewhere. These were consideration of natural capital / ecosystem services (one (1) respondent) and consideration of the potential requirements for energy storage capacity to make wind energy viable, and the consequent impacts of this (one (1) respondent)

4.6.5 Specific to the Sustainability Appraisal, two (2) responses agreed with the assessments. Seven (7) responses from the Energy sector requested clarification regarding the proposed ‘temporal planning’ and a potential disparity between the SA versus the SEA. One (1) comment considered that the

mitigation to cap development at 10 GW was not justified and no cap should be placed on the Plan. One (1) public body (statutory consultee) with specific expertise noted that they are strongly opposed to SW1 and NE6 on the basis of navigational safety.

4.7 Question 13 – “Would you add or change anything in the partial Equality Impact Assessment?”

- 4.7.1 Of the 39 responses received to question 13, 33 stated that they would not add or change anything within the partial Equality Impact Assessment, while three (3) responses stated that they did not know. Table 15 breaks down the responses by sector.
- 4.7.2 Of the three (3) responses proposing changes to the Equality Impact Assessment, one (1) individual requested further consideration of age discrimination, one (1) individual requested further consideration of the fisheries sector and one (1) organisational response requested additional information to be included on the importance of subsea cables (including the importance of telecommunications).

Table 15 Sectoral breakdown of responses to Question 13

Sector	Number of responses			
	Yes	No	Don't know	Total
Commercial fisheries	-	2	-	2
Energy	-	9	1	10
NA	-	13	-	13
Ports & harbours	-	1	-	1
Power Interconnectors / telecoms	1	-	-	1
Shipping	-	1	-	1
Tourism and recreation	-	2	-	2
Individual	2	5	2	9
Total	3	33	3	39

4.8 Question 14 – “Would you add or change anything in the partial Islands Communities Impact Assessment?”

- 4.8.1 Of the 60 responses received to question 14, 46 stated that they would not add or change anything within the partial Islands Communities Impact Assessment, while two (2) responses stated that they did not know. Table 16 breaks down the responses by sector.
- 4.8.2 Of the three (3) individual responses submitted which proposed changes, two (2) suggested further information to be included regarding the benefits of offshore wind development by either reducing the need for more carbon intensive energy generation for isolated communities, and through potential for co-location with hydrogen / green fuel production retaining jobs in island communities as opposed to exporting energy to the national grid. The third agreed with the approach taken and emphasised the need for consultation with island communities
- 4.8.3 The nine (9) organisational responses tended to focus on the area of interest for each organisation. Two (2) responses highlight the importance of navigational safety to island communities, both regarding recreational boating and lifeline ferry services. Two (2) responses addressed fisheries, with one (1) recommending further information be collected for Shetland, and the other sought assurances that access to offshore wind development areas is retained, particularly for fixed gear fishermen. One (1) respondent highlighted the inclusion of subsea cabling as an industry of high importance for island communities in the provision of power / telecommunications.
- 4.8.4 One (1) organisation queried why a similar level of community assessment has not been applied for rural mainland communities.

Table 16 Sectoral breakdown of responses to Question 14

Sector	Number of responses			
	Yes	No	Don't know	Total
Commercial fisheries	1	3	-	4
Energy	-	10	-	10
NA	5	11	-	16
Ports & harbours	-	1	-	1
Power Interconnectors / telecoms	1	-	-	1
Shipping	1	-	-	1
Tourism and recreation	1	1	-	2
Individual	3	20	2	25
Grand Total	12	46	2	60

5 Consultation Events

5.1 Introduction

- 5.1.1 Additional engagement was undertaken as part of the public consultation with 17 public events around Scotland during February and March 2020 and a further event in London in March 2020. An event was scheduled in Kirkcudbright after the consultation events commenced, following feedback received at the two events in Stranraer and Newton Stewart. Details of the events were advertised in the local and national press, as well as via social media, newsletters and direct mailing.
- 5.1.2 The objectives of these events were to:
- Raise awareness of the sectoral marine planning process and ensure that interested parties' views and knowledge are taken into account;
 - Raise awareness of the statutory consultation process and encourage participation
 - Answer queries regarding the Plan and supporting documents;
 - To gather feedback on the DPOs; and
 - Gather further information to support the finalisation of the Regional Locational Guidance.
- 5.1.3 Events were held in a range of locations (Table 17) and were open to all, with no need to pre-register to attend (with the exception of the London event). The events were advertised via local and national media, social media and by stakeholders through newsletters, e-mails etc. The events took the format of an open drop-in session, held between 13:00 and 17:30 each day, followed by a presentation and Q&A session between 18:00-20:00. The presentations used at these events is available online for reference.⁶
- 5.1.4 Hard copies of all documents were available at all events, as well as staff from Marine Scotland. In addition, staff from Crown Estate Scotland and consultants ABPmer, who were responsible for preparing the supporting assessments, were available at a number of the events. Hard copies of the Respondent Information Forms and Questionnaires were available for attendees to complete at the event, or to take away for later completion and return by post/e-mail.

⁶ The presentations used at these events can be viewed online here: <https://sway.office.com/PZ6MiHpILD0EufCY?ref=Link> (click on the individual regions to discover further detail).



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Consultation on the Draft Sectoral Marine Plan for Offshore Wind

KEY FACTS

- 17 Draft Plan Options 'DPOs' identified across five geographic regions.
- Located in a mix of shallower (<60m) and deeper (>60m) waters suitable for a range of traditional (fixed-bottom) and innovative technologies (such as floating offshore wind).
- It is proposed that no more than 10 GW of generating capacity can be developed nationally under this Plan.
- Only a proportion of each DPO will be able to be developed. It is not expected that all of the Draft Plan Options will be developed.
- The final Plan will provide the spatial framework for first cycle of seabed leasing by Crown Estate Scotland under ScotWind.

FIND OUT MORE:

Consultation open until
25 March 2020

<https://consult.gov.scot/marine-scotland/draft-sectoral-marine-plan-for-offshore-wind/>



OR CONTACT

SectoralMarinePlanning@gov.scot

<https://consult.gov.scot/marine-scotland/draft-sectoral-marine-plan-for-offshore-wind/>

Figure 7 Promotional material used at the consultation events

- 5.1.5 Three topic sheets, summarising the planning process, the draft Plan and potential impacts on the fishing sector, were prepared to support the consultation process.
- 5.1.6 Our Statement of Public Participation was published at the start of the consultation⁷ and sets out how and when we planned to engage with stakeholders and the public, as well as how views and opinions gathered during the consultation period would be used to inform the process going forward.
- 5.1.7 The event locations and dates are shown in Table 17, below.

Table 17 List of consultation events (February - March 2020)

Date	Location
6 February	Stranraer
7 February	Newton Stewart
10 February	Elgin
11 February	Wick
12 February	Scrabster
14 February	Stromness, Orkney
17 February	Oban
20 February	Bowmore, Islay
20 February	Peterhead
24 February	Pittenweem
25 February	Dundee
26 February	Stirling
27 February	Lerwick, Shetland
3 March	Ullapool
4 March	Eyemouth
5 March	Stornoway, Isle of Lewis
9 March	Kirkcudbright
11 March	London

5.1.8 The events were attended by a range of individuals representing different sectors, organisations as well as members of the public. Attendees are summarised as:

- Chambers of Commerce
- Community Council members

⁷ The Statement of Public Participation is available to view here:
<https://www2.gov.scot/Resource/0054/00549051.pdf>

- Consultants
- Council officials
- Elected Members
- Enterprise Organisations
- Individual fishers
- Individuals / local residents
- Local Development Trust
- Marine Scotland – Local Fisheries Offices
- Members of the public and local residents
- Members of the Scottish Parliament (MSPs)
- National, local and regional fisheries organisations / associations
- Newspapers and local media outlets
- Oil and gas companies
- Regional Marine Planning Partnership representatives
- Renewable energy developers
- RSPB Scotland
- SNH

5.1.9 The representation per event is detailed in Table 18.

Table 18 Attendee numbers at Consultation Events

Event	Day Attendees	Evening Attendees	Total
London	5	-	5
Kirkcudbright	20	20	40
Stornoway	7	8	15
Eyemouth	8	8	16
Ullapool	4	8	12
Shetland	7	11	18
Stirling	3	6	9
Dundee	8	9	17
Pittenweem	15	11	26
Peterhead	11	12	23
Islay	12	9	21
Oban	4	6	10
Stromness	15	7	22
Scrabster	8	10	18
Wick	11	3	14

Event	Day Attendees	Evening Attendees	Total
Elgin	3	5	8
Newton Stewart	35	30	65
Stranraer	12	7	19
TOTAL	188	170	358

5.2 Topics and Questions

- 5.2.1 The Plan representatives were available to discuss the topics raised by the attendees and answer questions raised. A summary of the topics and questions raised at each of the events is provided in Appendix B. These discussions have also fed into the finalisation of the Plan and Sustainability Appraisal.
- 5.2.2 Topics raised most frequently across the regions are fisheries (raised at 15 events); and socio-economic benefits and dis-benefits (raised at 15 events). The topic of grid and transmission infrastructure was raised at 11 events.
- 5.2.3 Effects on landscape, seascape and visual impact were raised at seven events with effects on recreational users raised at four events. Other topics raised included:
- Ports infrastructure: three events
 - Ornithology: two events
 - Tourism: two events
 - Natural heritage: two events
 - Marine mammals: two events
 - Existing developments: two events
 - Oil and gas: two events
 - Local regeneration: one event
- 5.2.4 A number of topics were also raised in association with the plan process and associated policies, these were related to:
- Climate change: three events
 - Leasing: two events
 - Energy generation targets
 - Energy policy
 - Onshore wind energy
 - Implementation mechanisms
 - Advisory Group
 - Engagement and dialogue

6 Abbreviations

AEOI	Adverse Effect On Integrity
A&B	Argyll and Bute (Council)
AoS	Areas of Search
BTO	British Trust for Ornithology
CCS	Carbon Capture and Storage
CCSA	Carbon Capture and Storage Association
CES	Crown Estate Scotland
CfD	Contracts for Difference
D&G	Dumfries and Galloway Council.
DPO	Draft Plan Options
E	East Area
E&W	England and Wales
EIA	Environmental Impact Assessment
EMF	Electromagnetic Field
EQIA	Equality Impact Assessment
EU	European Union
GW	Gigawatts
HM	Her Majesty's
HRA	Habitats Regulations Appraisal
ICIA	Islands Communities Impact Assessment
IM	Interim Management
IPR	Iterative Plan Review
JNCC	Joint Nature Conservation Committee
MOD	Ministry of Defence
MPA	Marine Protected Area
MS	Marine Scotland
MSP	Member of the Scottish Parliament
MW	Megawatt
N	North Area
NA	Not Applicable
NAEOI	No Adverse Effect On Integrity

NATS	National Air Traffic Services
NE	North-East Area
NGO	Non-Governmental Organisation
O+M	Operation and Maintenance
O&C	Opportunity and Constraint
OGUK	Oil and Gas UK
OW	Offshore Wind
OWF	Offshore Wind Farm
PMF	Priority Marine Features
RLG	Regional Locational Guidance
RSPB	Royal Society for the Protection of Birds
RYA	Royal Yachting Association
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SEIA	Socio-Economic Impact Assessment
SFF	Scottish Fishermen's Federation
SMP	Sectoral Marine Plan
SNH	Scottish Natural Heritage
SSSI	Site of Special Scientific Interest
SW	South West Area
SWFPA	Scottish White Fish Producers Association
UK	United Kingdom
WTG	Wind Turbine Generator(s)

A Consultation Questions

1. Do you support the selection of the following draft Plan Options?
2. Do you agree with the definition of commercial scale offshore wind farm projects as being projects being capable of generating over 100 MW of electricity?"
3. Do you agree that the scientific evidence presented demonstrates that DPOs NE2-6 and E3 are subject to high levels ornithological constraint and, therefore, the mitigation measures outlined in the draft Plan should be applied to these DPOs?
4. Do you agree that the scientific evidence presented demonstrates the requirements for further regional-level survey work within DPOs E1 and E2?
5. Do you have any comments regarding the proposed approach to iterative plan review?
6. Do you have any comments regarding the proposed formation and role of the Advisory Group?
7. Do you have any further comments or points that you think should be taken into account in the plan?
8. Do you have any comments on the Strategic Environmental Assessment Environmental Report?
9. Do you have any comments on the Habitats Regulations Appraisal?
10. Do you have any comments on the Socio-Economic Impact Assessment?
11. Do you have any comments on the draft Regional Locational Guidance?
12. Do you have any comments on the Sustainability Appraisal Report?
13. Would you add or change anything in the partial Equality Impact Assessment?
14. Would you add or change anything in the partial Islands Communities Impact Assessment?

B Consultation Event Summaries

Table B1 Topics and questions raised at Consultation Events

Event	Topics	Questions
London	<ul style="list-style-type: none"> • Advisory group • Ornithology • Grid infrastructure • Climate change • Energy generation targets • Leasing 	<ul style="list-style-type: none"> • How have fishers been involved in the process to date? • What about transmission considerations? • Implications of the updated foraging ranges produced by The Crown Estate Round 4 Enabling Actions Reports? How does the SMP relate to the Round 4 process? • How have the maximum capacities per DPO been defined? • Are we working towards an overall GW generating target? • Why was SW1 introduced after the scoping consultation?
Kirkcudbright	<ul style="list-style-type: none"> • Recreational sailing • Fisheries • Climate change • Port infrastructure • Socio-economic benefits • Tourism • Seascape and landscape 	<ul style="list-style-type: none"> • Why did SW1 appear post-scoping? • What has been the engagement with Dumfries and Galloway Council? • Has wild sea been considered within the planning process? • Have the proposals for a new National Park in Galloway been considered as part of the process? • How does this process relate to strategic planning for tidal power? • Have the Isle of Man been consulted? • Have E&W been consulted/notified of this process? • What's happening in E&W at the moment? • What is the overall target this plan seeks to deliver? • How did this relate to wider Scottish Government Energy policy?

Event	Topics	Questions
		<ul style="list-style-type: none"> • Why does the RLG document use the term “may” in relation to visibility from Galloway? Given the distances, surely there is no dubiety regarding potential visibility? • Data gaps in relation to migratory fish routes – what work is being done to address these? Needs to be carried out prior to projects being constructed – what happens if datasets show worse than predicted impacts – will they be forced to remove the structures? Discussion regarding the planned/ongoing research work on the East and West coasts to look at issues and also in relation to the ScotMER work. Also discussion regarding the future timescales – i.e. 10 years before we see construction, 2-5 years before we see actual applications – time for the emerging research to be completed and considering as part of the process. Cumulative (Electromagnetic Field) EMF impacts. Discussion regarding Programme for Government commitment around the Wild Salmon Strategy and addressing the 12 pressures. • Will the larger size of the Wind Turbine Generator (WTG) when compared to Robin Rigg result in increased damage to the seabed? • SEIA – fisheries – Kirkcudbright – 200 people employed – have we looked at the wider supply chain around fisheries? • What about the Marine Protected Area (MPA) work that is ongoing (around Priority Marine Features (PMF)) and potential cumulative impacts on Kirkcudbright fishers? • Discussion surrounding whether coexistence is a valid claim by developers, considering the assumptions upon which this Plan is based? Referenced insurance issue raised by fishers at the Newton Stewart event. Is anything likely to change in terms of coexistence as a result of the existing developments?

Event	Topics	Questions
		<ul style="list-style-type: none"> • This consultation gives the opportunity for fishers to feed it at the earliest, strategic opportunity – rather than at the end when decisions have already been reached. • D&G Council – why has there been a change in approach? • SEIA – where will the construction, operation and maintenance jobs be realised? Will it be England or will it be here? Discussion regarding tidal nature of Solway ports and also Scottish Ministers ambitions re: supply chain content. The need for a case regarding regional benefit. • Is investment in Scottish infrastructure projects by foreign investors a concern for the Scottish Government? • What if the developer subsequently sells the asset on? Decommissioning arrangements? • How long will the consent run for? Opportunities for extension/repowering and subsequent consultation and consideration of impacts? • What about the grid challenge and cable routes to shore? • What about opportunities for multi-use? E.g. tidal generation in conjunction with Offshore Wind (OW) power?
Stornoway	<ul style="list-style-type: none"> • Recreational sailing • Fisheries • Ports infrastructure • Socio economic benefits • Tourism • Seascape and landscape 	<ul style="list-style-type: none"> • How does this plan interact with previous plans for wave and tidal development? Why are plans for offshore wind more progressed? Is the cost reduction still true for floating offshore wind? • What are the timescales for the adoption of the Plan? • What about offshore export cables and installation methods, including over areas of hard ground? • Would you expect challenge regarding potential visual impacts? • What about the potential interactions with the island licensing regime within 12 nautical miles?

Event	Topics	Questions
		<ul style="list-style-type: none"> • What are the decommissioning arrangements and requirements placed upon developers? • Have National Scenic Areas been considered as part of the process? • How were the constraints identified and weighted? Particular interest in navigation and Ministry of Defence (MOD).
Eyemouth	<ul style="list-style-type: none"> • Fishing • Grid Infrastructure • Socio-economic benefits • Leasing 	<ul style="list-style-type: none"> • Is the 10GW limit for each Draft Plan Option? • What is its current time scale in terms of getting the windfarms operational? • Is this the final plan or will it change over time? • Will mitigation cause constraint for developers when planning their site? • Will there be enough evidence within 2 years to lift the moratorium for those sites? • Is the EIA process still set at 2 years? • Is there a balance between different sources of power in Scotland?
Ullapool	<ul style="list-style-type: none"> • Recreational sailing • Seascape and landscape • Socio economic benefits 	<ul style="list-style-type: none"> • What about the areas previously identified as possible tidal sites? • Is there no further capacity for onshore wind? Or will this plan mean that there is no more onshore wind? • What about the grid infrastructure requirements and associated onshore works? • Which fisheries datasets have been utilised? • What about market stabilisation?
Shetland	<ul style="list-style-type: none"> • Onshore wind energy • Grid infrastructure and inter-connector needs case 	<ul style="list-style-type: none"> • Overlap with cod spawning grounds in one site – what about protection proposals and potential impacts? • Why a technology neutral approach to planning?

Event	Topics	Questions
	<ul style="list-style-type: none"> • Socio-economic impacts • Fisheries 	<ul style="list-style-type: none"> • What datasets have been used to understand existing fishing effort? ScotMap was not completed in this area. • How has the socio economic impact assessment been undertaken? • What about the opportunities to strengthen the existing needs case? • What are the decommissioning arrangements?
Stirling	<ul style="list-style-type: none"> • Fisheries • Socio-economics • Natural heritage • Grid infrastructure • Implementation mechanisms 	<ul style="list-style-type: none"> • What's the timeline for Consultation Analysis Report? • When will the Plan be adopted? • What is the ScotWind timetable? • Discussion on Oil and Gas interests, carbon neutrality, navigation, helicopter routes. • How has grid connection been considered for the sites? • Discussion on offshore grid, grid connection and charging regime, O+M jobs • £500m-£2B in SEIA is a wide range, what is it based on? • Has the resourcing needs for Marine Scotland been factored into the Plan? • What has the reaction been from the fishing industry? Discussion on assumptions made in assessments and potential for mitigation
Dundee	<ul style="list-style-type: none"> • Fisheries • Socio economics • Marine mammals • Grid infrastructure 	<ul style="list-style-type: none"> • What about grid infrastructure requirements? • Does the national 10 GW limit include the sites subject to plan-level ornithological mitigation measures? • If data shows that there is less carrying capacity than originally anticipated – could this have implications for other DPOs not subject to the plan-level ornithological mitigation measures?

Event	Topics	Questions
Pittenweem	<ul style="list-style-type: none"> • Fisheries • Existing developments • Grid infrastructure • Socio economic benefit 	<ul style="list-style-type: none"> • What about potential impacts of construction and operational noise/vibration on lobsters, prawns and shellfish? Is this being looked at via ScotMER? • What about looking at mitigation measures being put in place in advance, such as nursery beds and lobster hatcheries – to provide alternative fishing grounds • What are the decommissioning arrangements? • What about if fishers are displaced from these areas into current fishery grounds? • What about floating turbines – greater impact on fisheries – how can these be mitigated? • What will the cable routes to shore look like? When will they be established/confirmed? What about burial risk assessments and techniques? • How far back with the individual project-level assessments have to look at fisheries effort – it can change from season to season and 2 years worth of data may not be truly reflective of the value of an area to the region. • What about a large scale study to look at closure impacts? • Closure of fishing grounds does not result in seabed recovery – seabed requires turning over by dredgers to maintain productiveness
Peterhead	<ul style="list-style-type: none"> • Fisheries • Existing developments • Grid infrastructure • Socio economic benefit • Ports infrastructure • Oil and gas 	<ul style="list-style-type: none"> • NE8 – the north end of this site present a particular concern regarding fisheries, as does NE6

Event	Topics	Questions
Islay	<ul style="list-style-type: none"> • Energy supply • Landscape impacts • Marine mammals • Ornithology • Socio economic benefit • Grid infrastructure 	<ul style="list-style-type: none"> • Do the assessments take account of decarbonisation? • What will the impact of the development be on the local community? • What are the chances of SW being selected / developed? • Islay consumes vast amounts of fuel for Whiskey and other island industries. Given the climate emergency we need to have greener fuel. • Can some of the electricity generated be diverted to Islay? {we} need to generate x6 the amount we consume to be sustainable. • Power keeps failing so Islay is vulnerable. [McKeen study on using energy generated in a more local way referenced] • Islay becoming over dependent on whiskey and tourism and needs another industry. • Which Minister will make the decision on whether DPO is developed and who would be the successful developer? • Locals should get the benefit from using “our wind” and not go the same way as whiskey where tax from whiskey revenues goes to UK and Islay sees none of it • Are there community funds Islay can tap into for renewables development? • Will the developers be Scottish or international? • Sceptical the development will provide many new jobs but the deal breaker really is – can Islay tap into the energy generated? • Impact on sailing routes and concerns about the safety of sailing amongst wind turbines? • Will Ministers stipulate the successful developer must demonstrate community benefit? • Islay energy trust are very keen to welcome developers who will bring energy to Islay.

Event	Topics	Questions
		<ul style="list-style-type: none"> • How would the site / sites link to the grid? Is that going to be an issue for Islay? • How engaged have A&B council and the community council been in the process?
Oban	<ul style="list-style-type: none"> • Fisheries • Socio-economic benefit • Engagement and dialogue 	<ul style="list-style-type: none"> • Realistically, what are the chances of West 1 being successful? • Will the money come to A&B or into wider pot? There should be benefit for the local community. • How accurate / realistic are the predicted financial benefits in the report? • There is a lot of fishing / inshore activity in the Oban area. That is a large area of lost fishing ground. Very disappointing that no one from the fishing sector turned up to the event. • Important that A&B council are engaged in the process. Will there be an opportunity for 1-1 dialogue with Marine Scotland (MS) during this process?
Stromness	<ul style="list-style-type: none"> • Fisheries • Socio-economic benefit • Ornithology • Climate change policy 	<ul style="list-style-type: none"> • Commercial viability of offshore wind, particularly floating offshore wind? • Why were areas added after scoping? • What about grid connection and transmission charging? • What are the benefits of ceasing fishing in Offshore Wind Farm (OWF) areas? • What about other generating sources – such as hydro and onshore wind? • What will this mean for the needs case for the interconnector for Orkney? • What about onshore infrastructure? • What about opportunities for hydrogen and battery storage?

Event	Topics	Questions
Scrabster	<ul style="list-style-type: none"> • Fisheries • Socio economic benefit • Grid infrastructure • Local regeneration 	<ul style="list-style-type: none"> • Concerns regarding potential for displacement here, fishing over the 4 degree line in N1, plotter data, mitigation measures – and exclusion for sein netters • When will projects start to begin construction? • How can local socio-economic benefits be secured? • How are landscape, seascape and visual impacts assessed, considering the potential subjective nature of these impacts? • What ornithology datasets have been used? Have British Trust for Ornithology (BTO) datasets been used?
Wick	<ul style="list-style-type: none"> • Fisheries • Landscape & seascape 	<ul style="list-style-type: none"> • What about the existing wave and tidal DPOs? • Why was N4 introduced post-scoping? • What about potential impacts to migratory species, particularly migratory fish? • Existing tagging work/datasets for salmon migration limited and may not be accurate?
Elgin	<ul style="list-style-type: none"> • Fisheries • Oil and gas 	<ul style="list-style-type: none"> • Why are these being proposed onshore? • What about potential interactions with oil and gas infrastructure (existing and future)? What about the potential for WTG to power oil and gas production? E.g. Equinor project Tampen style? • How much energy is required to power a town the size of Elgin? How much energy does Beatrice OWF produce? • Concerns regarding the impacts of NE4 and NE5, given the scale and location of existing and planned developments • Concerns that the fishing industry is being squeezed out by government policy surrounding energy generation and climate change • Why the reduction from 73 GW to the 3, 5 and 10 GW scenarios

Event	Topics	Questions
		<ul style="list-style-type: none"> • Why can't the turbines be placed on uninhabited islands instead? • Concerns regarding the increase in crabbers (east of Orkney), which are already impacting on white fish boats and then the subsequent cumulative impact of further OWF development? • Are birds considered as taking precedent over fisheries interests? • Concerns that fishing data only goes back 5 years and gaps in the datasets used – 5 years of data may not reflect that the fishing pattern is only temporary? • Concerns regarding the availability of alternative fishing grounds in bad weather given DPOs proposed east of Orkney and Wick. • Concerns regarding navigational safety for commercial fishers during poor/bad weather – e.g. loss of power within an array
Newton Stewart	<ul style="list-style-type: none"> • Fisheries • Socio-economic benefit • Landscape & seascape • Recreational users • Natural heritage • Energy policy 	<ul style="list-style-type: none"> • How does this plan relate to action around the climate emergency and climate change policy more broadly? • Have Special Areas of Conservation (SACs) been taken into consideration? • What about the local gannet colony on the Mull of Galloway? Has this been considered? • What about the existing tidal DPOs in this region? • How much energy does Scotland need going forward? Will this meet or exceed demand? • What type/level of local socio-economic benefit will the South West accrue from this? Given the nature of the port facilities • Issue of insurance for fishing vessels – not covered by their insurance if they collide with WTG. Will fishers be excluded from the development areas?

Event	Topics	Questions
		<ul style="list-style-type: none"> • Have lessons regarding fisheries interactions and impacts elsewhere in the UK been applied in Scotland? • What about the existing ferry routes and shipping traffic which passes through part of SW1? • How does the subsidy regime for offshore wind energy work? • What about the potential impacts on local tourism? • What about the local campaign to designate a new National Park in Dumfries and Galloway – would this be assessed in the SEA in terms of landscape, seascape and visual impact? • Have lessons been learnt from Robin Rigg? What about the bird monitoring data from Robin Rigg? • How frequently do birds collide with WTG?
Stranraer	<ul style="list-style-type: none"> • Fisheries • Socio-economic benefit • Landscape & seascape 	<ul style="list-style-type: none"> • Why was SW not included in the initial Areas of Search? • Has the risk for migratory routes for Atlantic salmon been considered? • Discussion on bird impacts considered in assessments • Is there a preference to have clusters of development? • Discussion on visual impacts, cumulative impact and SNH study

C List of Organisational Respondents

- Aberdeenshire Council
- Aker Solutions Ltd and Aker Solutions AS
- Argyll and Bute Council
- Caithness Chamber of Commerce
- Caithness District Salmon Fishery Board/ Northern District Salmon Fishery Board/ Flow Country Rivers Trust
- Carbon Capture and Storage Association (CCSA)
- Comhairle Nan Eilean Siar
- Comité National des Pêches Maritimes et des Elevages Marins
- Copenhagen Infrastructure Partners
- Copenhagen Offshore Partners
- Crown Estate Scotland
- Defence Infrastructure Organisation
- DEMA Concessions
- DP Energy
- East Lothian Council
- EDF
- EDP Renewables & ENGIE
- EnergyUK
- Environmental Protection Agency in Denmark
- ESB
- European Subsea Cables Association
- Fife Council
- Floating Power Plant
- Flotation Energy
- Friends of Floating Offshore Wind
- Galloway Fisheries Trust
- Galloway National Park Association
- GMS Wind Ltd
- Helmsdale Salmon District Fishery Board
- Highlands and Islands Enterprise
- Historic Environment Scotland
- INDUSTRIAS FERRI AS
- Interocean
- Isle of Whithorn Community Council

- JNCC
- Joint response between RWE Renewables and Innogy Renewables.
- Kirkcudbright Sailing Club
- Kirkmaiden Community Hub - committee member
- Kishorn Port Limited
- Law Society of Scotland
- Lerwick Port Authority
- Marine Management Organisation
- Marubeni Europower Ltd
- National Air Traffic Services (NATS)
- National Federation of Fishermen's Organisations
- National Grid ESO
- National Trust for Scotland
- NDT and Quality Services Ltd
- New Luce Community Council
- Northern Lighthouse Board
- Offshore Wind Limited
- Oil and Gas UK (OGUK)
- Orkney Islands Council
- Ørsted UK
- Port of Cromarty Firth
- Quaybridge
- Red Rock Power Limited
- Renewable Infrastructure Development Group
- RenewableUK
- Royal Burgh of Wigtown & District Community Council
- RSPB Scotland
- Scottish & Southern Electricity Networks
- Scottish Carbon Capture & Storage
- Scottish Fishermen's Federation
- Scottish fishing vessel
- Scottish Natural Heritage
- Scottish Pelagic Fishermen's Association
- Scottish Power Renewables
- Scottish Renewables
- Scottish White Fish Producers' Association
- Shell UK
- Shetland Fishermen's Association

- Shetland Islands Council
- South Lanarkshire Council
- Territorial Seas Committee, Isle of Man Government
- The Cock Inn
- The Maritime and Coastguard Agency
- The Mull of Galloway Trust
- The Royal Yachting Association Scotland
- The Solway Yacht Club, Dalbeattie
- UK Chamber of Shipping
- West Coast Sea Products
- Wick Harbour Authority



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