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13<sup>th</sup> August 2010

Mr Phil Gilmour,  
Offshore Wind Consultation,  
Marine Scotland,  
Area 1-A (South)  
Victoria Quay  
Edinburgh EH6 6QQ

Dear Mr Gilmour,

The Tìree Community Development Trust welcomes the opportunity to comment on the Scottish Government's Draft Plan for Offshore Wind Energy in Scottish Territorial Waters. In responding to the Draft Plan we have first made a number of points that seem most important from the perspective of a small coastal community, and have then addressed the 12 questions you have specifically asked.

We make this response as a single community and the comments herein are ours. Nevertheless, we are convinced that our comments have a general resonance for all coastal communities in North West Scotland. Indeed, we have also contributed to the response submitted to you by Argyll Renewable Communities (ARC), a consortium of the Argyll & Bute communities most affected by proposed offshore developments in Argyll waters.

The most important point we can make is that none of the guidelines or documentation – the draft plan, the SEA or other formal materials – refer to communities as living entities. There is an abundance of regulation, guidelines and advice concerning the assessment and mitigation of impacts of offshore developments upon wildlife and habitats and upon historical remains, but nothing at all on communities. The closest the documentation comes to addressing communities is in reference to fishing, passage of vessels and marine access for leisure craft. None of these are necessarily specific to the community most affected – they are specific to the waters within which the development will take place.

The coastal regions of North West Scotland are home to some of our most fragile communities and our most valued uninterrupted cultural heritage. One school-leaver a year (i.e. 10 - 15%) on Tìree is likely to become a fisherman and 4 or 5 will become crofters. This is as much a part of our living culture as the fact that 40% of Tìree households speak at least some Gaelic at home and that music, art and poetry thrive here. Tìree's largely intact and currently thriving Gaelic-speaking crofting community is increasingly unique in a Scottish context. Communities like ours are rarer and more threatened than many species of bird, mammal or fish. Huge infrastructural developments such as offshore energy projects have the potential to swamp our communities and their culture but could also, if managed well and locally, support and strengthen them.

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In 2009, as part of the ARC consortium, we asked SQW Energy to define the likely areas of impact that offshore wind developments would have. The summary of their findings is annexed to this letter. As you can see, the impacts are very varied and across the whole spectrum of modern coastal life. The Argyll Array has the potential to bring benefits to Tiree and to the rest of Scotland: it will certainly bring disruption and challenges to Tiree too, but not to the rest of Scotland. This disparity of impact must be recognised. At a recent public meeting to discuss the impact of the Array, one resident pointed out that financial investors in the Array stand to lose money or make it. We will have no choice but to invest our entire way of life in the Array. Best practice guidelines and formal regulations (which are lacking but are required now) have to acknowledge this and make sure that affected communities are both protected and receive an appropriate return on their involuntary investment. In particular, the following two inclusions in the consents process are required:

1. Communities must be one member of local tripartite master planning groups made up of the developers, the Council and the community. This will ensure that plans are not drawn up in isolation, which could lead to expensive and lengthy delays once applications for consents are submitted and then objected to. We see this tripartite planning group sitting in the gap between the proposed marine spatial planning and the current terrestrial planning process.
2. Part of the consents paperwork must be an independently written socio-economic impact assessment, prepared by a specialist acceptable to both the community concerned and the developers. The findings of the SIA will list a hierarchy of required mitigations for all detrimental impacts and these will be a condition of consents.
3. Local communities must have a clear and realistic opportunity to buy into the developments and so become part-owners of them.

Finally, we consider that it may be useful to think of two types of renewable development in Scottish territorial waters. First there are the offshore developments which take place at least 12nm from the coast. Second are the inshore developments which are built between the coast and 12nm. This is important, as clearly there is a correlation between scale and scope of impacts on coastal communities and their distance from the development. This broad general categorization will have to be flexible enough to deal with particular local conditions, but will serve as an initial guide on levels of likely impact.

We are aware that the developments being proposed are new and that appropriate legislation is not yet in place to regulate fully. However, the Scottish Government has a duty of care to our coastal communities, and this must not take second place to the desire to encourage new business opportunities. The community of Tiree would be willing to assist the Scottish government in framing appropriate regulations by taking part in a pilot study of the proposals for community participation we have set out in this letter.

Below we have made comments on specific sections of the Draft Plan, and finally we have tried to answer your own questions:



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3.1.3 “further evolution of...social and economic issues” what are these? There must be a distinction between cultural inheritance and cultural remnant: remnants are protected by legislation, inheritance is not.

3.2.5 RYA cruising routes and leisure are the only aspects considered under population and health. While important, these must be amongst the least important impacts on population and health, and have only limited impacts on local people. More important potential impacts include: local health services being swamped by influx of itinerant workers; local transport infrastructure being unable to cope with increased traffic; complete failure of local housing market due to very tight supply-side constraints being faced by highly resourced demand and normal delays in planning process; under-resourced education facilities failing to meet increase in demand from re-locating families; low capacity water and sewerage systems;

3.2.6 The SEA identifies impact on Skerryvore Lighthouse as the only adverse impact worthy of note under cultural heritage [although there is also potential for damage to onshore archaeological sites such as duns, brochs and stone circles etc]. If cultural heritage is the accreted remnants of previous cultures and civilisations, then this is appropriate. We feel very strongly that while these important historical artefacts must be protected, it is the living culture of the West Coast that is most at risk here. This section of the SEA and the consequent section in the Draft Plan must address the needs and concerns of the tax payers and citizens resident in the West Coast communities.

3.2.8 Levels of significance of impact on commercial fishing seem to have been calculated on the basis of tonnes of fish caught. It is more appropriate to measure in terms of level of impact on specific (especially local) fisheries. Small boats operating static gear are more closely fixed to their operating port and local waters, so are more subject to loss of income if a development takes place in their area. Bigger boats and boats operating mobile gear are better able to fish other waters.

3.3.3 There is no explanation for the fact that short term options in the North and West are generally closer to the shore than the medium term options. Specifically, what is the technical issue that prevents W2 medium-term option from coming close to Tiree but which is not significant enough to constrain the Argyll Array in a similar way?

3.3.5 Short term options in the West could provide powerful stimulus for improvements to local harbour facilities, so providing greater capacities for coastal recreation industry. This requires significant levels of partnership planning involving local communities, fisheries, ferry services, port authorities, the developers, Crown Estate and the Local Authorities. Without such co-ordination harbour services will be purchased by the developers from the nearest international facility – the Clyde, Belfast or beyond, so providing no benefit to local communities.



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3.3.6 See comment against 3.2.6 above. St Kilda, ancient wrecks, duns and brocks are cultural remnants, not part of any living culture. They are important and should be protected but not more so than the existing cultures and communities of the West Coast. The potential impact on cultural remnants is easily defined and mitigated. The impact on living culture and communities is potentially devastating and so needs detailed and exhaustive participatory planning.

3.3.7 It is possible that scheduling medium term options in a clear sequence of development will allow fisheries to move out during the construction phase. This is likely to be of more benefit to mobile gear fisheries than to static gear fisheries. (see comment on 3.2.8, above)

3.4.22 The SEA and the Draft Plan must recognise the difference between those fishermen who are local to development area (mostly 10m boats or less, static gear) and those who are not (mostly 15m+ and mobile gear). Impacts will be different on these two groups.

3.5 The Draft Plan provides an opportunity to give “strategic consideration to mitigation measures which could ...avoid major adverse impacts in the short, medium and long term.” However, the draft plan has not given strategic consideration to impacts on communities. It must include the need for independent socio-economic impact assessments to be carried out at the project level, followed by independently mediated negotiations between developers and communities to mitigate the potential impacts, as part of the project-level consenting process.

4.2.2 We do not consider the “normal licensing and consenting regimes” to be at all adequate. Insufficient attention is paid to socio-economic impacts and participatory planning at the project level. See above passim.

4.2.3 Similarly, a strategic level in-combination assessment of coastal community impacts is required, as well as individual project-level assessments as part of the project consenting process.

4.2.4 Ditto. At project level, independent socio-economic impact assessments are required

4.2.6 A coastal communities socio-economic base-line survey would assist with plugging the national-level data gaps, and would provide a yardstick for project-level SIA to be measured against.

4.2.7 This must include reference to communities. For instance, in the second sentence: “...protect Scotland’s communities, natural and commercial resources...”

Table 4.2 Landscape and seascape issues must be part of the assessment for Argyll Array given the proximity of the site to Tiree, and the visibility of Skerryvore lighthouse from the west end of the island. Many of the turbines will be much closer to Tiree than the lighthouse and much bigger.



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4.3.4 At the same time as assessing economies of scale through regional prioritising or clustering of developments, very careful assessment of likely disbenefits of such clustering must be carried out. For instance, if the Argyll Array goes ahead in the short term and Tiree is significantly involved in supporting the development, it will be the obvious place to base operations and maintenance activities for W1, W2 and NW4 in the medium term. The aggregated impacts on the community and culture of Tiree would be enormous and unprecedented anywhere in the UK in modern history.

4.3.6 (4<sup>th</sup> bullet point). "...vital that the scale of development does not exceed the capacity of coastal and marine areas in terms of visitor amenity and enjoyment." Likewise, it is vital that scale does not exceed the capacity of coastal communities and culture to survive the developments. Coastal communities and culture provide at least as much amenity and enjoyment for visitors as do the landscapes, seascapes, species and habitats of the area. Communities must be just as well protected as the environment, particularly as Tiree's crofting community is instrumental in maintaining excellent management of the island's internationally important onshore habitats.

#### RESPONSES TO SPECIFIC QUESTIONS

*1. Does the mapping of exclusion zones, environmental issues, and technical issues provide a reasonable basis for modelling the options?*

No, as the technical issues do not pay sufficient regard to impact on coastal communities and culture

*2. Do you have any further technical or environmental information you think we should take into account as we refine the Draft Plan?*

ARC is currently preparing to provide technical support for detailed socio-economic impact assessment (SIA) of 3 proposed short term developments in Argyll waters; this will be available in late 2010. Additional baseline surveys are required for all West coast communities.

*3. Do you consider that the Draft Plan presents a set of practical options?*

Yes

*4. Should any options be removed from the Draft Plan?*

No comment

*5. Are there other options we should consider in the medium or long term?*



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No comment

*6. How can the Draft Plan be improved? What should be taken forward differently and why?*

A regional assessment of likely socio-economic impacts must be carried out by Government. In addition, project-specific independent socio-economic impact assessments must be carried out by suitable experts acceptable to both developers and local communities as part of the project consents process. The findings of the SIA will include required mitigation of disbenefits.

*7. Do you have views on the scale and pace of development that could be sustainably accommodated in STW, taking into account the findings from the SEA and the technical assessment?*

One current constraint on offshore development is the weakness of the grid. Leadership from government is required to define the scale and schedule of grid developments.

*8. Have we got the balance right in the Draft Plan, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts?*

No. Definitions of benefits relate entirely to national or at best regional economic impact, while consideration of disbenefits concentrates only on the natural environment and some specific commercial interests. There is no consideration of the potentially huge social and cultural costs to be incurred by the communities closest to the developments. Likewise, there is no plan to ensure that economic benefits flow directly to those communities.

*9. The Plan, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often should this be done and why?*

No comment

*10. The SEA has identified that there could be significant adverse effects, from the Draft Plan as a whole, on Scotland's landscapes and seascapes. Measures for the mitigation of these effects have been identified in the SEA environmental report.*

*Do you have a view on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?*

We were unable to find reference to actual mitigation measures proposed in the SEA. Section 8.7.3.d mentions that impacts should be avoided or reduced through appropriate design, but appropriate design must surely be a requirement of all offshore planning.



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11. Do you have any other views on the findings of the SEA? Do you think that all the environmental effects (positive and negative) have been identified? Are there other issues that we should be taking into account in the preparation of the Draft Plan?

The most important failing of the Draft Plan is the lack of any reference to protection of coastal communities and culture and mitigation of negative impacts upon them by offshore development. Tight regulation and detailed guidelines exist for developers working in non-OECD countries, but there is no equivalent protection for our communities. The Draft Plan must address this.

12. The Draft Plan has identified environmental and technical issues in the north and north west regions of Scotland, in particular. It may therefore be reasonable to give further consideration to these regions. Do you think that development in these or other regions, or individual options within them, should be given lower priority or perhaps deferred to the longer term?

All options must be independently assessed for socio-economic impacts on coastal communities as part of the consents process for each project. Additionally, region-wide or national SIA must be prepared in the same way as the SEA was prepared.

Prioritisation of any region or individual option is meaningless without a clear guide on the future grid developments.

Please do not hesitate to contact us should you have any further questions. Allow me to reiterate: the community of Tiree is very willing to assist in the development of appropriate best-practice in participatory planning and consents procedure for inshore wind energy projects that will significantly and enduringly impact upon the host community. I look forward to discussing the possibilities for such a collaboration in the very near future.

On behalf of the Tiree Community Development Trust, yours sincerely,

Lloyd Gudgeon  
Manager

cc: Jim Mather MSP  
Alan Reid MP

Oban South & the Isles Ward Councillors, Argyll & Bute Council

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