

ISLES SPATIAL PLAN CONSULTATION 2015 AND SUSTAINABILITY APPRAISAL



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

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3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

To assist with responding to the consultation on the draft Plan and Sustainability Appraisal please consider the following questions.

1) Do you agree with the approach used to develop the Plan? Are there aspects of the Draft Plan that you believe should be improved? Are there any aspects you believe should be taken forward differently?

The report sets out the policy context of the European Union and UK and devolved administrations. The definition of objectives, of the geographic scope and the justification of the outreach, policy context definition and opportunity are well defined and clear. A particular strength of the document is the alignment of the stages for the Plan Development and Implementation, with SEA, HRA and SEIA, as exemplified in Figure 3 (page 4).

The report clearly states that the Plan includes landfall connections but nothing further onshore. This is understandable, however, it would have been worth presenting a vision of how discussion with relevant parties will include consideration of the breadth of ecosystem services of relevance to the high level objectives of ISLES (e.g. 'To identify specific measures to avoid, minimise or otherwise mitigate adverse effects on people, the economy and the environment within the study area'). Indeed, there appears to be a lack of consideration of better integration and understanding of the human–environment relationships which could be provided by employing an Ecosystem Approach, or at least an Ecosystem Services-based approach. Such approaches are advocated by the Scottish Government (e.g. NPF3, SPP) but appear absent from the document. The terms 'Ecosystems Approach' and 'Ecosystem Services' are absent from the main planning document, with Ecosystem Values mentioned (page 20) in relation to Stakeholder Participation.

Comments on selected specific entries, focusing on landscape and seascape:

1. The language used is sometimes unclear. For example, on page 21, in the Summary of ISLES Locational Guidance, on the topic of Population and Human Health - In the following sentence, it seems likely that the correct intention would be to omit the word 'not'.

Current text: "Avoid, as much as possible, developing offshore cable routes or positioning collector hubs in areas which would not detrimentally impact on commercial and recreational uses of the sea and seabed including commercial fishing and aquaculture, shipping and navigation and recreational uses."

2. There are inconsistencies in references to the characteristics of landscapes and seascapes which should be resolved to ensure that the locational objectives, influence and rationale are understood and clear. Inconsistencies risk leading to differences in opinion about the interpretation of spatial factors, and thereafter on the derived spatial plans.

For example, on page 23, under landscape and seascape – collector hubs, reference is made to 'on landscape or seascape including designated or protected landscapes'. Whereas on page 42, with respect to mitigation on the same topic, reference is to 'designated coastlines'. Similarly, under landfall connections reference is made to 'within or adjacent to protected landscapes' in one and reducing effects on key features which contribute to amenity value in the other.

3. Page 23, in the Summary of ISLES Locational Guidance, on the topic of Landscape and Seascape – The location objective would be improved by removing reference to ‘highest amenity value.’ A suggestion is to replace the wording with ‘... detrimentally impact on the amenity of the area’. This would be consistent with the European Landscape Convention (ELC), which notes the importance of all landscapes. SNH note that the ELC provides a framework for our work for Scotland's landscapes, and that seascapes are a particular aspect of landscape, being a composite of maritime and terrestrial elements (SNH, Landscape Policy Framework, 2005). A similar point is made in guidance published by SNH on ‘Landscape Considerations in Strategic Environmental Assessment’ (www.snh.gov.uk/docs/B710441.pdf).

It would also be more consistent with the emphasis in the Rationale for Collector Hubs in which reference is made to landscape and seascape in general, ‘including designated or protected landscapes.’

4. On page 48, in Routeing Strategy and Mitigation, under Landscape and seascape, the same comment of replacing ‘highest amenity value’ is relevant. In the sentence regarding Collector Hubs, reference is made to ‘designated coastlines’.
5. The category of Locational Influence of the landfall locations should be reconsidered with a view to it being ‘Low to Moderate’. It can only be Low if there is a suitable solution to mitigating impacts on landscape and seascape. It would seem more appropriate to ascribe the locational influence as being the same as for marine cables on biodiversity, flora and fauna, for which the Rationale recognises that it may not be possible to avoid protected sites. This could be the same for landscape and seascapes, particularly given the above comments about the importance of all landscapes.
6. The Next Steps Policy Actions are logical and appropriate. The ongoing improvement of the provision of relevant environmental data is aided by Scotland’s Marine Atlas, and Scotland’s Environment Web. Increasing the logical links of the spatial data in each of these major portals of data will help achieve the expectation of Action 3 on data collection, sharing and knowledge gaps.
7. In Chapter 10, the derived spatial plans do not appear to take account of the work on the spatial modelling of seascapes in Wales and Scotland, and guidance associated with development (e.g. Hill et al., 2001, Guide to Best Practice in Seascape Assessment, by Countryside Council for Wales and Brady Shipman Martin, for INTERREG 1994-1999; and the Seascape Assessment of Wales; Scott et al., 2005). Nor of analysis of seascapes for development of Windfarms or aquaculture in Scotland (e.g. Scott et al., 2005, An assessment of the sensitivity and capacity of the Scottish seascape in relation to windfarms, for Scottish Natural Heritage; Campbell, 2011, Landscape/seascape capacity for aquaculture: Outer Hebrides pilot study, for Scottish Natural Heritage). It would be appropriate to include reference to such work, and either incorporate the principles they set out or explain why they are not of direct relevance to the ISLES spatial plans.
8. No reference could be found to the derivation of buffers, weightings or relative proximity to the Environmental Features, Constraints & Routeing Opportunities. For example, the contribution or impact of built features on landscape and seascapes is generally through characteristics such as their visibility, from onshore and offshore (e.g. see Miller and Morrice, 2001, A Geographical Analysis of the Intervisibility of the Coastal Areas of Wales for Characterizing Seascapes, for Countryside Council for Wales). If not included in the derived maps, reference should at least be made in the text to explain the definitions of

the spatial elements and the strategic nature of the geographic scale rather than the derivation of more detailed information. The inclusion of relevant spatial representations of the influences of environmental features should form part of the next steps and actions, and filling of knowledge gaps.

9. No reference could be found to a spatial representation of a combination of the Environmental Features, Constraints & Routeing Opportunities for each Network Area. The advantage of combining such constraint maps is in providing a graphic synthesis of the issues and indication of the types of trade-offs which may require to be made in proposing final routings. If not already produced, this would be a highly desirable output to have included.

10. No reference is made to potential cumulative environmental impacts within the background or specific plans. Although reference is made to mitigation measures, and locational issues, some discussion of approaches to consider the potential cumulative impacts of collector hubs, or of landfall features, and the types of factors which might be of relevance which developing the locational guidance for each Network Area.

For example, this could be relevant to marine tourism, and in relation to perceptions of naturalness, and so of landscape and seascape views, something recognised as of importance in the Socio-economic impact Assessment (e.g. page 168, 'The landscape, seascape and views around the Irish coastline are intrinsic to the area's ability to attract tourists and visitors [AECOM and METOC, 2010]. The generally unspoilt and undeveloped nature of much of Ireland's coastline also makes it ideal for wildlife related tourism').

2) Do you have any views on the findings of the Sustainability Appraisal Report? Do you think that all the social, economic and environmental effects (positive and negative) have been identified? Are there other issues or alternative options that should be taken into account?

No comment offered

3) The Socio-economic Impact Report has identified a range of potential impacts on existing sea users. Do you have any views on these findings? Do you think that the proposed mitigation measures would be effective? Do you have any additional suggestions?

See comments under Response 1 in relation to landscape and seascape, in particular the need to consider these outwith areas which are formally designated in relation to landscape factors, the desirability of considering offshore experiences and views and not only those from onshore, and the lack of consideration of cumulative impacts of collector hubs and landfall features. Reference to these would aid in the consideration of factors within locational guidance.

4) Do you agree that the Plan is a useful tool for greater co-ordination between Partner administrations? Please include any suggestions you have for further enhancing this co-ordination in future.

The Plan offers a good basis for greater coordination between stakeholders in the area of the study. It brings data together which will enable further discussion about the issues identified, which can be shared across the partner administrations as well as wider stakeholder interests. This should include greater involvement of the relevant administrations in Wales and England.

From the ISLES WWW site it is not clear what processes were followed to enable the coordination which took place. Enhancing coordination could include that of the wider stakeholder community to ensure that the components and analysis of the spatial plans for each Network Area are robust. The provision of an engagement strategy would be a helpful addition to any further development of the project outputs.

5) Does the plan provide suitable arrangements for monitoring environmental and social effects during the implementation of the Plan? If not please detail why and provide suggestions on how this could be improved.

The plan notes the need for monitoring environmental and socio-economic effects (e.g. page 25, policy actions, Draft ISLES Spatial Plan and Locational Guidance). It recommends that monitoring should be undertaken where it is required in law or policy. However, it provides no details on approaches or specific arrangements.

These requirements should be set out in more detail by relevant authorities if the steps proposed are pursued.

6) The Plan, if implemented, should be reviewed to take account of actual development and increasing knowledge of development factors. How often do you believe this should be done and why? Who do you believe should be involved in the Plans Review Steering Group, to oversee the review process?

As noted in Response 4, it appears that engagement with a wider stakeholder community would be appropriate. This could enable discussion about both development factors and the means of enhancing the account taken of environmental and socio-economic considerations. Therefore, the Plan(s) should be updated to account for analysis of the data presented as well as the spatial extent and locations of certain types of features.

The rate of change in some aspects of relevance to ISLES is dynamic (e.g. other uses of coastal areas – aquaculture, etc.), for which data are increasingly available. An indicative timescale to implementation would inform comment on frequency of updates. Broadly, that could be once a year so that the agreed baseline information is contemporary, enabling more detailed plans for individual Network Areas as options and plans for development evolved. Such a timescale would allow the inclusion of data, as they became available, which may not be collected at the same time, or by the same means, in the areas of each partner administration (e.g. data on tourism and visitor numbers).

The Steering Group for a topics such as that covered by ISLES, with a geographic overlap with a wide range of interested parties, should be small, with a strategic remit, accompanied by wider mechanisms of stakeholder engagement to encourage both buy-in and critical analysis.

Members of the current Steering Group presumably draw on the knowledge of colleagues in different areas of responsibility in partner administrations. The direct participation of those with specific remits on environment, socio and economic factors, and marine planning would all seem appropriate, but not representing all these themes for each administration.

7) Are you aware of any additional on-going research or monitoring that may help to fill gaps in the evidence base, particularly relating to the marine environment and its interactions with subsea electricity cables? Please give details of additional relevant sources.

See comments regarding analysis of seascapes in Response 1.

The analysis of seascapes provides approaches which should be considered for strategic planning, in relation to landscape and seascape. The methods described can be applied across the area of the ISLES spatial plan. Analysis and reporting by Hill et al. (2001) related to INTERREG 1994 to 1999, for collaboration between the Republic of Ireland and Wales.

8) Do you have any other comments you wish to make on the Plan and / or the related assessments

We welcome the development of a plan such as that proposed by ISLES, and its aims. It provides a valuable contribution to the development of a strategic view of issues requiring to be addressed for the development of interconnected grid networks to enhance the integration of marine renewable energy between Scotland, Northern Ireland and Ireland. The consideration of a spatial plan aligns well with both terrestrial and marine initiatives. Further development of the spatial plan(s) should provide a good basis for consideration of the planning options for the development of such grid networks, and proper consideration of environmental and socio-economic impacts across jurisdictions.