



Onshore Wind Policy Statement Refresh 2021: Consultative Draft

Comments on behalf of Fisheries Management Scotland

Introduction

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards, the River Tweed Commission and charitable Rivers and Fisheries Trusts. Our members work to conserve Scotland's valuable and iconic wild salmon and freshwater fish and fisheries and the aquatic environment on which they depend.

Our members are accustomed to working with onshore wind developers during the planning, building and operational phases, and fisheries trusts often undertake surveys to ensure that the building process does not impact the water environment, and local fish species.

Consultation response

We have chosen not to respond via citizen space. The consultation document, and the specific consultation questions, seem to be primarily aimed at developers, but there are some key points that we wish to contribute to this process.

We would like to emphasise the importance of considering all elements of Scotland's energy mix in a coordinated manner. Whilst we understand that the current consultation is focussed on onshore wind, this cannot be considered in isolation from other forms of energy production, including hydro-electricity and marine renewable energy. The development of onshore wind capacity has strongly influenced the manner in which hydro-electricity is generated, as energy companies try to balance energy output from windfarm and hydro resources, a balance which is often driven by economics. The greater emphasis on utilising wind energy as part of this mix, has meant that energy companies are holding water in lochs at levels which are damaging important riparian habitat. This issue needs greater consideration and more effective regulation. In addition, the wider mix of renewable energy that is now on-line, should also result in greater emphasis on addressing some of the long-standing impacts resulting from hydro-electricity generation, including environmental issues associated with abstraction and fish passage.

The Scottish Government has recently published the Scottish Wild Salmon Strategy which recognises that we must reinvigorate our collective efforts to ensure a positive future for wild salmon, noting that the strategy forms part of the Scottish Government's commitment to lead by example and play our full part in tackling the twin crises of climate change and biodiversity loss. With this in mind, we welcome the inclusion of section 4.3. in the consultation document and the reference to conservation and enhancement of biodiversity, habitats and species. There are also important references to peatlands and carbon-rich soils in chapter 4. Peatland protection and restoration is not just important for tackling carbon emissions – these vital habitats also play an important role in protecting water quality in Scotland's rivers. We do not feel that this is given sufficient priority in the consultation document and we are concerned about the references to 'striking the right balance'

between onshore wind and peatlands. In our view, peatland protection and restoration should take priority over onshore wind development.

Wind farms are large-scale industrial developments which are often located in sensitive upland head waters of river catchments. There is therefore a real risk that these developments impact water quality, fish species and their habitats. Our members work to highlight a range of issues (summarised below) and assessment and mitigation of these issues should be a standard requirement in the planning process.

- New and upgraded access track layout in relation to the proximity to sensitive fish habitat (e.g. spawning habitat);
- New and upgraded watercourse crossing type, design, and structure (need to maintaining the existing gradient, maintaining fish access at all water heights etc.);
- Construction of new tracks (including layby locations), trackside drainage plans and designs especially in relation to increased run off rates;
- Turbine base excavation and associated run off from loose ground;
- Peat disturbance in relation to water quality, peat slides or ground slips;
- New borrow pits impacts on water quality;
- Forestry felling and replanting activities, particularly in riparian areas;
- Changes to instream hydrological conditions and flush zones;
- Exacerbated erosion and/or elevated levels of suspended silt to watercourses during construction activities;
- Pollution to watercourses in the form of chemical pollution;
- Reduction in quantity and quality of instream habitat from silt input, culvert placement etc.;
- Direct mortality of fish species from any instream works or significant pollution;

It is essential that well-designed and competent fish survey programmes are undertaken at the appropriate times for wind farm developments to ensure that any sensitivities are identified and can be considered fully during the design and construction phases. Baseline surveys should be used to inform the EIA and design phase. Depending on the findings of the baseline surveys then pre-construction, during construction and post construction fish surveys should be undertaken to monitor for possible impacts from the development on any sensitive fish populations present. If impacts are identified then suitable mitigation measures should be put into place. Data from the baseline fish surveys are particularly important to inform the design of new water course crossings, Habitat Management Plans (HMPs) and Fish Monitoring Plans (FMPs).

The consultation asks what wind farm developments can offer in terms of protecting and enhancing the natural environment, in particular through the planting of trees to compensate for those lost during windfarm development and through peatland restoration. The wild salmon strategy has set out actions required to improve the climate resilience of rivers, for example through supporting targeted riparian tree planting and natural regeneration and peatland restoration. Windfarms are often located within Sitka spruce plantations and the requirement to replace the area lost from forestry could be a good opportunity for the required replacement trees to be targeted as native deciduous riparian woodland rather than simply new conifer planting. In delivering the Wild Salmon Strategy, we believe that there is real scope to prioritise 'net biodiversity gain' by focussing efforts to plant native trees in areas where there is a real ecological need. Planting native trees next to rivers will provide multiple environmental benefits and will help to provide dappled shade to cool our rivers, thereby providing long-term resilience to climate-induced warming. This should be a key

focus for the environmental elements of the Onshore Wind Policy Statement and should deliver an overall benefit to the local environment and biodiversity.

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

Individual

Organisation

Full name or organisation's name

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Publish response only (without name)

Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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?

Yes

No