

Response to the Scottish Government Consultation on proposals to designate four Marine Protected Areas in Scottish waters

30 August 2019

About Energy UK

Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership covers over 90% of both UK power generation and the energy supply market for UK homes. We represent the diverse nature of the UK's energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, who now make up over half of our membership.

Our members turn energy sources into electricity for over 27 million homes and every business in Britain. Over 680,000 people in every corner of the country rely on the sector for their jobs, with many of our members providing long-term employment as well as quality apprenticeships and training for those starting their careers. The energy industry invests over £12.5bn annually, delivers around £84bn in economic activity through its supply chain and interaction with other sectors, and pays £6bn in tax to HM Treasury.

Response to Consultation Questions

Q1. Do you support the designation of these possible Marine Protected Areas?

Energy UK supports the Scottish Government's vision for a marine environment that is clean, healthy, safe, productive and diverse seas; managed to meet the long-term needs of nature and people. We expect Marine Protected Areas (MPAs) to play an important role in achieving this vision. Therefore, we support the designation of these MPAs in principle; however, until more details are published on the proposed management measures, and the impacts that this might have on nearby offshore wind farm developments, we cannot draw any firm conclusion as to the proposed designation.

Q2. Do you agree that the scientific evidence presented justifies the case for the designation of each site?

Energy UK is unable to comment on the specifics of the underpinning data, but for mobile species in particular, within the context of recent evidence of changing environmental baselines, it is recommended that a wider Government-funded monitoring programme is implemented to monitor whether boundary changes to MPAs will be required.

Q3. Do you have any comments on the Conservation and Management Advice for each site?

Energy UK does not consider the Advice for these sites to give sufficient detail to allow us to understand how these designations would affect the development, operation and maintenance of offshore windfarms outside, but near to the MPA.

Marine Scotland's scoping study to identify Areas of Search for offshore wind energy developments in Scottish waters took these proposed MPAs into account, and has identified a number of areas adjacent to the MPAs as suitable Areas of Search. We therefore expect that Marine Scotland has considered the potential impact that such developments may have on these MPAs and has concluded that this does not preclude these developments from occurring near the MPAs. As described in response to Q5, we believe that Marine Scotland should make its assessment of this issue clearer.

Q4. Do you have any comments on the Business and Regulatory Impact Assessment for each site?

Offshore wind/renewable generation was not identified in the Business and Regulatory Impact Assessments for potential future use within the North East Lewis, Sea of the Hebrides and Shiant East Bank proposed MPAs (pMPAs). Given the UK's Offshore Wind Sector Deal and net zero commitments, there may be technology advancements and other factors which make these pMPAs suitable for co-existence with offshore wind. As an industry body, we would like to highlight this co-existence potential early in the process and ask that any management measures considered are proportionate.

Q5. Do you have any comments on the Sustainability Appraisal, including the Environmental Report and the Socio-Economic Impact Assessment?

The Sustainability Appraisal and the Socio-Economic Impact Assessment only make very brief reference to the Scottish Government's Offshore Wind Sectoral Marine Plan, currently being drafted. This sector plan is key to achieving Scotland and the UK's targets for net zero CO2 economies, which are necessary to mitigate the risk of catastrophic climate change and ocean acidification; both of which would have serious adverse effects on the species which the MPAs aim to protect.

We appreciate that there are difficulties in accurately anticipating the number of projects that will be brought forward under this sector plan, and the location of developments within Marine Scotland's Areas of Search. However, we still consider it worthwhile for a scenario-based analysis to be undertaken to assess a range of impacts upon the MPA if windfarms were to be developed within the Areas of Search. This would give developers and conservationists more confidence as to the local impacts that the development of renewable energy infrastructure would have on the MPAs and weigh this up against the benefits that would be realised in fulfilling Scotland's and the UK's climate ambitions.

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