

# **Marine Scotland National Marine Plan Consultation Response by Highlands and Islands Enterprise**

## **Introduction**

The Highlands and Islands of Scotland's is home to a vast natural resource in terms of wind, wave, tide and hydrocarbon reserves. It is also home to a unique and varied range of species and habitats that we must preserve for the benefit of all. Highlands and Islands Enterprise is committed to the development offshore energy within its region and to capturing the maximum economic benefit from the deployment of offshore projects, with the minimum environmental impact that supports long term sustainability.

The introduction of marine planning is a key tool to allow us to achieve sustainable economic growth. Marine planning allows us to focus on the growth of existing and new marine industries within a framework which ensures protection of the underlying resource and recognises the intrinsic value of our stunning marine environment.

We support the presumption of sustainable development when consistent with the policies and objectives of the national marine plan. We also support the policy encouraging developments which provide economic and social benefits to Scottish communities. This supports our economic development objectives and maximises the potential to create jobs and attract inward investment.

Highlands and Islands Enterprise supports the Scottish Government's vision for the marine environment, "*clean, healthy, safe, productive and biologically diverse oceans and seas, managed to meet the long term needs of nature and people*". We believe that the development of offshore renewable energy projects in Scotland can contribute to this vision by supporting emissions targets, energy security and sustainable development and the protection of Scotland's environment.

## **Regional Marine Planning Partnerships**

Regional Marine Planning Partnerships will comprise representatives from a wide range of stakeholder interests, including public authorities and representatives that reflect the commercial, recreational and conservation interests of that region. It would appear that development of an agreed regional plan between organisations with such diverse interests would be difficult and would represent an additional layer of control that would lead to a lack of clarity and potentially delay in the planning process.

There are 11 planned MPPs of which 7 are within the Highlands and Islands. HIE could find itself sitting in a considerable number of these bodies with a significant resource requirement.

## **Continuity with Terrestrial Planning**

The development of grid connected offshore renewable projects will always involve corresponding offshore and onshore works, which means that a project cannot be consented in a single part. With the addition of regional plans and the possibility of large projects spanning

planning regions it is unclear how consenting will be affected. This is particularly confusing in the Pentland Firth and Orkney waters where 7 planning documents are in force.

Where enterprise agencies seek to develop supply chain facilities to support offshore project development, or port and harbour infrastructure, whilst there is no physical link to offshore projects, an economic link does exist which should be considered in the planning process.

There needs to be consistency between marine and terrestrial planning regimes, as highlighted by the case of the European Wind Deployment Centre that has achieved a marine consent, but the application for onshore works was rejected.

A planning and consenting process that is project based rather than location based would give greater clarity to the process and would be more attractive to inward investors.

### **Marine Protected Areas**

Whilst Scotland's seas are vast, as is the energy resource available, there are areas where proposed MPAs and energy resource overlap for example oil & gas, and offshore renewables to the north of Shetland. It is not entirely clear how the final designations will be arrived at, from those MPAs proposed.

### **Offshore Renewable Sector Plan**

Renewables 1, states that there is a presumption in favour of the adopted plan options as prescribed in the draft plan. Whilst the locations for the development of offshore renewables have been derived to minimise the environmental impact of offshore energy projects, these locations may not be optimum in terms of project economics. Only once more is known about grid development, technology development and the regulatory regime can the optimum sites be identified. We would request that some flexibility is exercised in terms of draft plan locations as more information becomes available on offshore renewable project economics.

If offshore renewable technology does not mature at the same pace, or indeed a technology may never mature sufficiently to be economically viable, allocating sites to a particular technology may hamper the commercial development of another technology.

### **Marine Aquaculture**

Regulation of marine aquaculture activities should be through the marine licensing system. It is incongruous that a key industry should be the only activity in the marine environment which is regulated through a terrestrial planning system.

We recognise that the timing of the 2010 Marine Act posed difficulties in transferring marine aquaculture out of planning and into a licensing system. However in the long term interest of sustainable economic development of marine aquaculture the industry should be subject to the same licensing regime as other marine operations.