MPA 20048



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Monday 2nd September 2013

MPA Network Consultation,
Scottish Government,
Marine Planning and Policy Division,
Area 1-A South,
Victoria Quay,
Edinburgh,
SCOTLAND.
EH6 6QQ

Dear Sir/Madam,

Thank you for giving us the opportunity to provide feedback on the MPA network proposals recently announced by the Scottish Government.

Natural Power Consultants (NPC) are fully supportive of the establishment of a network of MPAs to protect Scotland's rich and varied marine life. Our concerns relate to the practicality of assessing potential impacts of a development on a pMPA within Environmental Impact Assessment.

Please find enclosed our consultation response to Final Thoughts, Question 36 - "Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?".

We hope that you find our response clear and self-explanatory, however if you would like further clarification please do not hesitate to contact NPC at the postal address provided, or via email - amyw@naturalpower.com.

Yours Sincerely,

Amy Walker Marine Ecologist

Final Thoughts

36. Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?

Yes	\boxtimes	No	П
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Thank you for giving us the opportunity to provide feedback on these proposals. Our concerns relate to the practicality of assessing potential impacts of a development on a pMPA within EIA. As there is now a requirement to assess the pMPAs within EIA as if they were fully designated we feel more guidance is required in order to ensure full and compliant assessments are conducted. Specifically more guidance is required as to whether the licensing authority expects to see a HRA or EIA style assessment? Assessments of potential impacts on designated protected areas (i.e. SACs and SPAs) benefit from detailed conservation objectives which provide structure and direction for HRA allowing evidence to be presented concisely. Currently, however, the conservation objectives for the protected features within the pMPAs are high level only (i.e. "conserve" or "recover") which would make assessment of a development's impacts on these conservation objectives subjective at best. We would also like to see further guidance on how we would assess potential impacts on the remaining 4 search areas which are still under consideration, which are yet to be assigned even the high level conservation objectives.