

Response to Draft Sectoral Marine Plan for Offshore Wind

March 2020

Dear Sir/Madam,

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy industry. We represent around 260 organisations working across the full range of renewable energy technologies in Scotland and around the world, from large suppliers, operators and manufacturers to small developers, installers and community groups and companies right across the supply chain.

We strongly welcome Marine Scotland's support for further offshore wind deployment in Scotland and our members welcome the draft plan. We are also encouraged by the support shown for the development of emerging technologies such as floating offshore wind which will further increase the potential for deployment in Scotland.

Offshore wind will have a key role to play in achieving Scotland's ambitious but necessary climate targets. Activity has increased significantly in the last few years with 10% of the UK's operational offshore wind capacity now in Scottish waters¹. The sector currently employs 3,400 people² and this is expected to grow as deployment increases with a further 2.5 GW of capacity under construction³.

The key points in our response that we wish to highlight are as follows:

- The need for increased ambition within the draft SMP by retaining all Draft Plan Options, addressing ornithological constraints and exploring the need for potential derogations.
- The above should reflect increased ambition for offshore wind deployment in Scotland. We recommend deployment of 12 GW by 2030 and potentially 30 – 35 GW by 2045.
- The SMP HRA should be based on the conclusion of no AEOI from consented projects.
- DPO NE6 should be removed from the list of high ornithological constraint as the degree of risk is not as great as for the other high ornithological constraint sites
- The methodology used to determine the 10 GW deployment cap should be revised to ensure that it does not unduly constrain development.

Overall ambition

Offshore wind will have a key role to play in achieving Scotland's ambitious but necessary climate targets. We welcome recognition of new emission reduction targets set out in the recent Climate Change (Emissions Reduction Targets) Act 2019, i.e. a 75% reduction by 2030, compared with 1990 levels and net-zero date of 2045 within the draft SMP. To meet these ambitions, as well as the Scottish Government's commitment to 50% of energy demands to be met by renewables by 2030, and contribute a resource-appropriate share to the UK's

¹ 1 GW of a total 8.5 GW operational capacity as of 20.02.20

² ONS, Low carbon and renewable energy economy indirect estimates

³ Naithe ne Goithe, Moray East, Kincardine and Sea Green 1

need to achieve 75GW offshore by 2050 (as identified by the UK Committee on Climate Change) there is a need to add significantly to the future pipeline in Scotland through additional leasing.

We welcome the parallel consultation on a Scottish Government policy statement for offshore wind and recommend that this articulates clear goals for deployment to 2030 and 2045. Given new net-zero targets and increased ambitions for the sector across the UK, we recommend that Scotland aim to deploy 12 GW of offshore wind by 2030, and potentially 30 – 35 GW by 2050. Targeting a 40 to 45% share of UK deployment⁴ would make the most of Scotland's excellent wind resource and bring substantial economic benefit. The 2030 figure is an appropriate near-term milestone on the pathway to 2045 and will require revisiting of the Scottish Offshore Wind Energy Council's (SOWEC) current ambition of 8 GW by 2030.

Addressing constraints

Although the draft SMP may contain sufficient seabed to meet the ambitions outlined above, this is currently constrained by both ornithological risks and the deployment cap of 10 GW. To support increased ambition, we therefore recommend that all Draft Plan Options be retained, ornithological constraints be addressed as a matter of urgency and the potential need for derogations be explored.

We support the plan led approach and the stakeholder engagement that has taken place during its development, and the robust process that has been followed is important for creating investor certainty. However, some of our members note the more precautionary approach to offshore wind planning taken in Scotland relative to other parts of the UK. Whilst this brings benefits in terms of robust and holistic assessments, it can also act to pre-empt development work. For example, a number of previous Areas of Search were removed (although the reasons for doing so are not given clearly within the SMP). Many risks can be managed on a regional or project level and allowing this to take place appropriately in the planning process can help ensure that the best sites, mitigations and compensations are applied.

We welcome the inclusion of DPO SW1, made to the SMP since the initial scoping consultation as an attempt to increase the likely DPO area under 60m water depth. Our feedback to the SMP scoping consultation in 2018 highlighted the lack of shallow water sites capable of accommodating fixed-bottom foundations. This reflected industry concern that this technology will likely to be used for the earliest projects to be deployed from the plan.

Although improved, the fixed bottom potential within the draft plan remains limited. Five of the 17 DPOs have a substantial proportion of seabed at below 60m depth that could be suitable for use with fixed bottom foundations, representing 24% of the total seabed area identified in the SMP. Two of these sites (NE4 and NE5) are listed as having higher levels of ornithological constraint and it will be important to ensure that these constraints are assessed and reviewed in a timely manner to enable future development at these sites, should this become possible. Similarly, many of the most commercially viable near-shore deeper water sites are also listed as being under higher ornithological constraint, reinforcing the importance of a tightly scoped and well managed Iterative Plan Review (IPR) process in enabling sufficient offshore wind pipeline in Scotland. Derogations under article 6 (4) may also be required to release additional capacity, and our members would therefore welcome clarity on the process at both project and plan level.

We look forward to working with the Scottish Government as its plans for offshore wind and its wider response to the Climate Emergency are developed.

Kind regards,

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⁴ Scotland will have a c.20% of the UK's installed offshore wind fleet by the time all projects currently under construction come online

CONSULTATION QUESTIONS

1. Please enter any comments you may have in relation to this question below. Please ensure that you indicate which DPO(s) you are referring

Our members strongly support all of the selected DPOs, given the need to identify future pipeline in Scotland to deliver substantially increased renewable generation to meet 2030 and 2045 climate and energy targets. Our feedback to the scoping consultation highlighted the lack of shallow water sites capable of accommodating fixed-bottom foundations. Although availability is still limited, particularly with the additional ornithological constraints, we recognise efforts by Marine Scotland to address this. Given these limitations, we therefore strongly recommend that all DPOs be retained.

Section 2 helpfully set out the process undertaken to refine the initial area of search identify to the Draft Plan Options below. However, it is not clear on what basis the 22 Areas of Search (February 2019 map) were reduced to 17 Draft Plan Options, specifically with the removal of the North East sites further offshore (listed as NE3 in the Feb 2019 map). Given that this significantly reduces the likely available leasing area it would be helpful to have transparency on the reasons behind the decision set out clearly within the final SMP. Likewise, any additional changes to the DPOs moving on from this consultation needs to be clearly documented.

DPO	Strongly support	Somewhat support	Neither support nor oppose	Somewhat oppose	Strongly oppose
SW1	X				
W1	X				
N1	X				
N2	X				
N3	X				
N4	X				
N5	X				
NE1	X				
NE2	X				
NE3	X				
NE4	X				
NE5	X				
NE6	Yes - our members believe that this DPO should be removed from the sites subject to high ornithological constraint.				
NE7	X				
NE8	X				
E1	X				
E2	X				
E3	X				

COMMENTS ON THE DPOS:

2. Do you agree with the definition of commercial scale offshore wind farm projects as being projects being capable of generating over 100 MW of electricity?

Do you think this level should be: Lower (100 MW) If you have stated that the level should be lower or higher, please provide reasons below.

Our members support raising the threshold above which projects are defined as 'commercial scale offshore wind' as this will reflect technological development in the industry and potentially enable innovative approaches such as combination with oil and gas platforms. Consideration should be given as to whether the 100MW definition of 'commercial-scale' should be increased to allow the future development of direct wire projects to be progressed outside of ScotWind. This would avoid delay, and diffusion of focus, should representations be received that a possible site in the locality of oil and gas infrastructure is not be included in the current Draft Sectoral Marine Plan.

In relation to test and demonstration scale projects more generally, our members feel that an increase in the threshold to around 300MW would be appropriate to enable, for example, testing of floating offshore substations and combination with oil and gas platforms. We view demonstration at this scale as an important next step for industry in order to advance Scotland's floating offshore capabilities and achieve aspirations for growth in this important sector.

3. Do you agree that the scientific evidence presented demonstrates that DPOs NE2-6 and E3 are subject to high levels ornithological constraint and, therefore, the mitigation measures outlined in the draft Plan should be applied to these DPOs?

Yes No Don't know

Please enter your comments in relation to this question below. Please ensure that you indicate which DPO(s) you are referring to:

The HRA concludes that AEOL cannot be ruled out for DPOs NE2-6 and E3 and as a result these are identified as subject to high levels of ornithological constraint. The basis for concluding possible AEOL in DPOs NE2-6 in Moray, is the advice of SNH on previous windfarm applications in the area and 'general consensus' that the carrying capacity for Kittiwake interest features of East and North Caithness Cliffs SPAs is close to being reached, with the potential in-combination effects from development at these DPOs with the consented Moray East, Moray West and Beatrice offshore windfarms leading to a conclusion of likely AEOL. However, these three projects are now consented and have an Appropriate Assessment by the Competent Authority that concluded no AEOL alone and in-combination. We would therefore ask that HRA should be based on these assessments' conclusions that no AEOL has been concluded to date.

The precautionary nature of assessments (as referenced in paragraph 10.7.9 of the HRA) should be addressed, especially when considering the DPOs considered a high ornithological constraint. For example, comparisons of assessment risk (i.e. the worst case scenario(s) assessed at Application) to consent risk (any variations to the worst case within the consent compared to the assessment, e.g. a reduction in turbine numbers) and as built risk (what does the project look like once constructed and is the actual project less than the worst case assessed), including how 'as built' scenarios can better be taken into account in subsequent projects. It is acknowledged that such an approach would need to take account of legal certainty in terms of what has been built vs what could be built, together with different project life stages.

Our members recognise that those developers awarded DPOs which are subject to high levels of ornithological constraint shall have to work closely with regulators, SNCBs and other stakeholders to address uncertainty. It would be prudent to structure a specific working group to address ornithological constraints either as a standalone group or as a sub-group which feeds into the Advisory Group.

NE6

Our members believe that the inclusion of NE6 within the DPOs which are subject to high levels of ornithological constraint is not justified. Of the 6 DPOs flagged as high ornithological constraint, NE6 alone is beyond the 60km foraging range for kittiwake from the East Caithness Cliffs and North Caithness Cliffs SPAs flagged as for concern in-combination, but rather is within range of the Lions Head, Troup Head and Pennan SPA, which is not flagged as being of current concern. It is therefore not clear, given an absence of understanding about the connectivity / interaction of Kittiwake between SPAs, how this conclusion has been reached. The HRA also identifies that for a risk of AEOL to be present at NE6, development at an additional two DPOs (NE4 and NE5) which are under high ornithological risk would be required. Our members therefore believe that this DPO should be removed from the list of sites which are subject to high ornithological constraint.

Mitigation

Of the mitigation measures suggested in Appendix J, our members note that a number of the bird related measures are not relevant to offshore wind (but are likely derived from wave or tidal) and for some impact pathways no mitigation measures are linked.

4. Do you agree that the scientific evidence presented demonstrates the requirements for further regional-level survey work within DPOs E1 and E2?

Yes **No** Don't know

Please enter your comments in relation to this question below. Please ensure that you indicate which DPO(s) you are referring to Comments (optional)

Whilst it is recognised that concerns exist among SNCBs with regard to these sites, our members do not agree that scientific evidence for an inevitable AEOL at these DPOs is necessarily overwhelming. The evidence presented appears to hinge on SNCB advice and the DPO location relative to kittiwake foraging range, combined with SNCB concerns that existing projects will result in an AEOL – the latter not being compatible with the current consent decisions. On that basis, it could be argued that the ornithology risk for this area does not appear to be any greater than areas that have been developed elsewhere in the North Sea where project based data collection as part of the EIA baseline characterisation process has been sufficient for competent authorities to reach a conclusion of no AEOL (alone or in-combination).

Further exploration of the RSPB seabirds at sea data (presented in Figures 7 and 8 of the HRA) may clarify the risk especially for kittiwake (especially for E2 and the easterly part of E1), coupled with an examination of the precaution inherent in assessment and greater understanding of the headroom. However, our members agree that further data collection will increase the evidence base and enable greater certainty to be placed on individual project level assessments – potentially reducing the reliance on precaution and de-risking the process further. That process could be linked to wider technological advances in how such data are collected but also greater understanding of the actual available headroom.

5. Do you have any comments regarding the proposed approach to iterative plan review?

Our members welcome the commitment within the Draft SMP for the final SMP to be subject to iterative plan review (IPR) and management following adoption, supported by an Advisory Group and support the intention to review the plan on a two-yearly basis. However, more generally, it is normally the case that a plan level assessment is undertaken on best evidence available at that time but that it represents a point in time. The IPR is introduced in the draft HRA as plan level mitigation (together with project level HRA), as a process to provide assurances that the draft Plan will have no AEoI. Mitigation measures are defined in government guidance as being 'protective measures forming part of a project and are intended to avoid or reduce any direct adverse effects that may be caused by a plan or project, to ensure that it does not have an adverse effect on the integrity of a habitats site(s)'⁵. In effect, the IPR is a management tool or process and not a mitigation measure in itself.

An important element of iterative plan review will be a process for identifying when the evidence base will become sufficient to allow HRA of future plans to conclude no likely AEoI from the DPOs currently subject to high ornithological constraint and enable developments within these DPOs to be consented. A timetabled evidence-gathering exercise, including monitoring data from consented windfarms and additional research projects, should set out how and when this evidence will be available to a satisfactory level, identifying further research gaps and how these will be addressed. Further information on how the key knowledge gaps identified under paragraph 11.6.6 will be filled would be welcome. We also encourage the Scottish Government to look into opportunities to collaborate outside of Scotland given a number of UK wide initiatives that could provide valuable input to Scottish assessments.

To have a rolling programme of the IPR has the potential to have an ongoing influence at project level, which is potentially concerning for developers progressing projects in the DPOs not currently considered high risk. It would be helpful to have a very clear scope for the IPR and that this should extend only to the currently constrained DPOs and the inclusion of potential new DP. Clarity is also needed that individual projects will be autonomous in their decision making, that full access to Article 6(3) and Article 6(4) remains at project level where relevant in each case and that if an individual developer makes a case for a project it should be considered on its own merits.

Our members seek clarity regarding a number of questions:

- What does a plan update mean for the remaining DPOs, not currently considered high risk? If the review process were used to retrospectively change the status of currently unconstrained DPOs, which may in future contain areas under agreement for lease with the Crown Estate Scotland, this level of uncertainty would be unacceptable to developers and our members would therefore welcome confirmation within the final draft that this will not be part of the scope of the IPR process.
- Where does the IPR leave project level autonomy (including access to the derogations if required) going forward?

6. Do you have any comments regarding the proposed formation and role of the Advisory Group?

As stated in our response to question 5, our members welcome the intention to establish an Advisory Group to identify gaps in scientific knowledge and to guide the IPR process. The in-combination ornithology issues resulting in likely AEoI of an unmitigated SMP will also be considered within current England/Wales leasing processes and project consenting under the Planning Act in England/Wales. It is important that the Advisory group is informed by these parallel discussions. Representation on the Advisory Group from those with a UK-wide remit including the JNCC would be helpful, as would other mechanisms to ensure the IPR process is connected to wider UK (and global as appropriate) considerations of the same issues.

⁵ <https://www.gov.uk/guidance/appropriate-assessment#what-are-mitigation-measures>

Further, clarity is sought as regards who will sit on the Advisory Group for the IPR, what powers they will have over individual projects and what input developers will have as regards research undertaken. At present industry engagement with the SMP is conducted through Scottish Renewables' position on the project steering group. Our members would welcome consideration of the most appropriate mix of representation, for example supplementing the group with representatives of those companies with the relevant site leases to the discussions taking place.

As noted above, our members recognise that those developers awarded DPOs which are subject to high levels of ornithological constraint shall have to work closely with regulators, SNCBs and other stakeholders to address uncertainty. It would be prudent to structure a specific working group to address ornithological constraints either as a standalone group or as a sub-group which feeds into the Advisory Group.

7. If you have any further comments or points that you think should be taken into account in the plan, please provide those below.

The 10 GW deployment cap

Our members are concerned with both the methodology used to calculate the 10 GW deployment cap and how it relates to the Strategic Environmental Assessment. Expressing maximum deployment in GW risks unnecessarily limiting deployment as additional capacity may be obtained in future through turbine advancements with no additional environmental impacts. Moreover, the realistic maximum development scenarios for each DPO have been calculated on the density assumption of 5MW/km². Recent UK experience has suggested that this density may be too high, although more representative of existing Scottish windfarms. The result of calculating at too high a density is to impose a DPO cap that is unrealistically low in percentage terms, and so our members recommend that these calculations be re-considered.

It is also not clear how the 'Realistic Deployment Scenarios' for each DPO have been calculated and whether these are the assumptions upon which the Strategic Environmental Assessment is based. Given the implications for ScotWind leasing, it would be helpful to clarify how the cap relates to the identified constraints.

We also highlight the following questions with regards the impacts of the cap on ScotWind leasing; although these are questions for Crown Estate Scotland we feel that these issues are important considerations within the context of the SMP:

- If proposed as a cap, how is it intended this will align with the proposals for ScotWind Leasing, which would need a mechanism for resolving competing bids if fixed caps are exceeded?
- If a developer has evidence to suggest that a larger percentage of a DPO can be developed than the proposed cap would allow, will this be permitted within the ScotWind leasing process?
- If the most competitive bids are located in the same region and bids in other regions are less competitive, can the more competitive region take capacity from another region?

HRA and IROPI

Our members would welcome clarity on the process for project-level consideration of IROPI, and the role of the Advisory Group. Given that section 5.2.1 states that 'developers may choose to pursue licence and consent applications for projects within these DPOs' we would suggest that the IPR and Advisory Group (without compromising the conclusions of no AEoI at plan level) should not prevent individual projects from pursuing derogations if that is the only route open to them. Clarity on how such a route would work, given the remit of the IPR and the ornithological constraints placed on some DPOs, is requested.

SUSTAINABILITY APPRAISAL

These questions cover the Sustainability Appraisal for the draft Sectoral Marine Plan for Offshore Wind. This includes the Strategic Environmental Assessment Report, a Habitats Regulations Appraisal and a Social and Economic Impact Assessment.

8. Do you have any comments on the Strategic Environmental Assessment Environmental Report?

Consideration of Alternatives

Our members feel that there is inadequate consideration (identification, recording, comparing and selection) of reasonable alternatives with regards to the plan, its strategic objectives and its individual policies (the DPOs). There should be clear consideration of alternatives using the Sustainability Appraisal/ SEA objectives in order to allow assessment of the pros and cons of different policy options (in this instance the DPOs). It would be helpful if a clear rationale for the chosen options could be detailed.

The iterative process undertaken to identify and refine areas of search and the DPOs themselves, represents consideration of reasonable alternatives but there appears to be an absence of them having been considered in the context the SEA / SA objectives, and provision of a clear rationale for choosing certain DPOs (and why certain DPOs, or previous areas of search have been removed from the draft Plan).

As per the previous comments, our members would welcome greater transparency on the process to refine the 22 AoS to the 17 DPOs, and believe that if this further explanation (detailed rationale and assessment undertaken to support the down selection process and consideration of different options for each DPO) was included, it could also demonstrate the required consideration of alternatives. Reasonable alternatives to the Plan, its vision and high-level objectives would normally be considered as part of this process. This could include a 'do nothing' option where the proposed Plan is compared against not having a Plan for offshore wind energy and the pros and cons are weighed up against SA/ SEA objectives. Section 3.2.2 of the SA states that a "do nothing" option has been considered but it is not clear where the appraisal of this is provided within the suite of documents.

9. Do you have any comments on the Habitat Regulations Appraisal?

Our members broadly support the conclusions of the HRA, although we request that the text is updated to reflect the legal baseline based on recent consent decisions which have all concluded no AEoI to date.

Our members agree that avoiding AEoI is highly desirable. However, it is also acknowledged that while a plan level assessment may conclude no AEoI, when detail at project level comes forward there will remain the risk that a conclusion of AEoI cannot be avoided. It is therefore requested that the IPR and Advisory Group (without compromising the conclusions of no AEoI at plan level) do not prevent individual projects from pursuing the derogations if that is the only route open to that project. Clarity on how such a route would work, given the remit of the IPR and the ornithological constraints placed on some DPOs, is requested.

We also suggest a review of the mitigation measures included and the impact pathways identified as some appear to be drawn from wave and tidal projects, not wind. Further, in a number of cases the degree of sensitivity or concern appears excessive when compared to current practice (e.g. pollution issues, migratory fish issues) and not all identified pathways are linked to mitigation measures (or relevant mitigation measures) in Appendix J. The seabird sensitivities identified in Table 8 do not appear to correlate to the paper cited or seabird sensitivities to OWF. While not expected to result in any changes to the conclusions of the HRA, these matters could do with a sense check and clarity. In particular, clarity is sought to clarify if individual projects will be

required to implement the mitigation measures identified/assess the pathways defined or if a project level approach can apply (drawing on those measures/pathways relevant to individual projects).

Our members also seek clarify regarding the status of potential derogations. There are 17 DPOs in the assessment and of these, 6 are under high ornithological constraint until more research is undertaken and a further 2 are subject to additional research requirements. While it is noted in section 5.2.1 of the draft SMP that developers may choose to pursue licence and consent applications within the six high constraint DPOs, how that could work in practice is unclear. The process leaves just 9 DPOs which are, based on the currently available information, considered to be relatively unconstrained by HRA matters. Again, it would be helpful to understand whether the process for a developer seeking access to these constrained DPOs (including the derogations if project specific study requires it) is the same as that for the unconstrained DPOs.

We have appended additional analysis of the HRA, conducted by external consultants on behalf of Scottish Renewables, to our response.

10. Do you have any comments on the Social and Economic Impact Assessment?

Our members welcome acknowledgement of previous comments in relation to the SEIA, although we note that underlying methodologies have not been adjusted. For example, the SEIA calculates the negative impacts on commercial fishing from the Plan. These potential negative impacts are based on the worst-case scenario that all fishing activity ceases within arrays, and that it is not displaced elsewhere. Our members consider that this worst-case scenario is not realistic, as fisheries exclusions, where they exist, are likely to be temporal in nature and unlikely to persist in the operational phase of the windfarm project. Should exclusions apply, compensation schemes would be in place to offset any negative impacts. Displacement rather than cessation of fishing activity is a more likely result of any exclusion. We therefore believe that the SEIA significantly over-estimates the negative impact on commercial fisheries.

Offshore cable routes remain a key concern for fisheries at a project and regional level. The plan does not take these into account, however, and we would recommend that this is added to the final SMP.

Section 5 on social impacts on individuals, communities and society includes a statement that child wellbeing and happiness could be negatively affected due to 'less family time where workers move to new regions to take up jobs'. There is no clear evidence to this effect and we recommend that this be rectified, or the statement removed.

Interactions between floating wind and fishing

The consultation also notes that the impacts on fishing from floating offshore wind farms is as yet uncertain. Although in some cases anchor cables may prevent fishing around such installations, industry is working hard to find solutions that would enable continued access to fishing vessels within these windfarms and we would welcome acknowledgement of this within the final SMP. Various technical solutions exist to reduce constraints to fishing activity, with cost and foundation technology being the factors that will determining the extent to which this is possible. Some lessons can also be learnt from France, where navigational impacts have been managed through joint industry working groups to determine safe navigation between and around turbines, and the development of a new safety jacket to enable live identification of men overboard.

11. Do you have any comments on the draft Regional Locational Guidance?

The guidance does not adequately explain why some of the 22 Areas of Search shown in the February 2019 release have been removed from the current list of 17 DPOs, particularly with regard to the changes within the

North East sites and boundaries. Further clarity on the decision process for removal of these areas would be welcomed.

12. Do you have any comments on the Sustainability Appraisal report?

Mitigation

Plan level mitigation is described in section 4.7 of the Sustainability Appraisal as “Requiring appropriate temporal planning so that appropriate consideration is given to the desirability of developing sites within the same region at the same time in order to reduce the potential for cumulative effects associated with construction activities.” This should be determined either through a project level assessment including in combination HRA assessments or if at plan level the requirement for restrictions should be considered, assessed and identified. This does not appear to have been included in the HRA nor is there a justification for such a mitigation provided in the SEA.

Our members also recommend consideration of environmental enhancement schemes at a plan level. We consider that enhancements should either be considered on a project level, or if at plan level much more detail on the location, scale and justification should be provided. As this does not appear to have been provided at this stage, we suggest reference to this mitigation should be removed until further definition is available.

Aviation

On and offshore wind turbines are an established part of the Scottish sea and landscape and that offshore windfarms now form part of the environmental baseline against which future air surveillance (radar) infrastructure should be procured.

Sections 4.2.5 of the Sustainability Report and section 3.2.3 of the SEIA suggest that ‘any potential cost attributed to the mitigation of impacts on aviation radar has been assumed to be met by the developer’. This does not recognise the evolving environment baseline against which surveillance infrastructure needs to be procured going forward.

Our members recognise that in the short run, some developer contribution to aviation mitigation may be required on a transparent, cost recovery basis, but that this should only extend for the interim period until such time as surveillance systems are refreshed, not the lifetime of the development.

It is imperative in order to meet net zero and renewable energy targets that aviation radar issues are resolved, and this will require government leadership and investment to facilitate win-wins of future Communication, Navigation and Surveillance (CNS) infrastructure fit for purpose for defence (Air Defence, Air Traffic Control (ATC)), civil ATC, offshore aviation and offshore energy operations (renewables and Oil and Gas). There is an urgent need to move from “mitigation” to “self-management” of the offshore wind radar issue, as the 2017 Onshore Wind Policy Statement envisages for the onshore wind radar issue.

SUPPORTING PARTIAL ASSESSMENTS

13. Would you add or change anything in the partial Equality Impact Assessment?

Not answered.

14. Would you add or change anything in the partial Islands Communities Impact Assessment?

Not answered.