

28 May 2021

## **Response to Marine Scotland: National Marine Plan Review**

### **Scottish Renewables**

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland leading the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. The sectors we represent deliver investment, jobs, social benefits and reduce the carbon emissions which cause climate change. Our 300 members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world.

### **RenewableUK**

RenewableUK's members are building our future energy system, powered by clean electricity. We bring them together to deliver that future faster; a future which is better for industry, billpayers, and the environment. We support over 400 member companies to ensure increasing amounts of renewable electricity are deployed across the UK and to access export markets all over the world. Our members are business leaders, technology innovators, and expert thinkers from right across industry.

### **Summary**

Scottish Renewables and RenewableUK welcome this opportunity to comment on the Review of the National Marine Plan 2015.

We are very encouraged by the content of this Review document and feel that it successfully captures the changing policy context faced by those industries working in the marine environment.

We welcome the clear statements that climate change is the most critical factor affecting Scotland's marine environment and that:

*'the focus placed by the Plan on climate change needs to be raised to a new level and to respond to the transformational impact of the climate emergency on the marine space - both in terms of environmental impact and in terms of major changes in human use of Scotland's marine zone, which is set to become the home of some of Europe's most significant offshore renewable energy developments.'*

We are pleased to see recognition that offshore renewables have an increasing role to play in meeting net-zero targets and supporting economic renewal:

*'...one of the most critical areas for strategic focus in the context of a green recovery and climate change is the marine renewables sector. With huge wind resources and a marine area six times the size of Scotland's land mass, offshore wind offers considerable*

*potential for sustainable economic growth. Scotland can and should be a leader in marine renewables.'*

There is also welcome acknowledgment that further work is needed to provide a framework to manage spatial interactions between marine users, particularly as the footprint of the offshore wind industry grows.

The offshore wind industry is actively working towards addressing potential conflicts between targets, working through strategic groups including the 'Floating wind and fishing' group recently convened under the Floating Wind Centre of Excellence. In addition industry is funding research and working through SOWEC to address these issues. We would look to see this work incorporated into such a framework.

While the language in the Review tends to be about potential conflict and competition, we would suggest that a more strategic approach can be taken, with the concept of co-existence at its heart.

The Sectoral Marine Plan already illustrates the extent to which offshore wind will become a major part of Scotland's built infrastructure, so a new balance between the interests of all licensed marine users will need to be found. Within this context, the extent to which marine activities contribute to the government's net-zero and biodiversity targets should be a key consideration in striking such a balance.

We would like to move forward with a focus on shared ambitions for the marine environment, looking at where offshore renewables can play both a central role in clean energy generation and in supporting the protection and restoration of marine biodiversity.

### **Have we considered the right set of "relevant matters"? Is there anything we have missed?**

Yes, this Review does capture the major themes relevant to the future of the National Marine Plan.

Arguably the global biodiversity crisis could be captured separately from the climate theme (though obviously interlinked) as this could bring in some of the current discussion about 'restoration/rewilding' of the marine environment, and in turn this could stimulate discussion about the role for offshore wind sites in supporting species recovery.

While the term marine renewables is used within the National Marine Plan we are concerned that this term is being treated as synonymous with offshore wind. As Scotland is a world leader in the marine technologies of tidal stream and wave energy, we would like to see more clarity in the document around the distinction between fixed offshore wind, floating offshore wind, tidal stream and wave energy. Such a distinction is necessary as each technology has distinct attributes that affect issues such as spatial planning, ecosystems management, the design of the blue economy and just transition.

We would also like to see more explicit reference to the UK and Scottish Government targets on renewable energy. The Offshore Wind Policy Statement is mentioned but for wider audiences we feel it is important to illustrate the scale of offshore wind ambition for the

decades ahead with references to 40GW by 2030 (UK) and up to 11GW by 2030 ambition (Scotland). Industry is of the view that Scotland will require an more ambitious, resource appropriate share of the UK wide 2030 targets in order to encourage the scale of offshore wind required to meet Net Zero. For example, while there is a 1GW by 2030 UK target for floating wind, we feel this is not sufficiently ambitious, and indeed it does not reflect the market appetite for commercial scale floating wind that we expect to see in ScotWind. We would also welcome recognition that the current ScotWind leasing round will result in up to 10GW of further offshore wind sites in Scotland, in addition to the around 9GW already in the construction or development stage.

It is also important that the NMP is congruent with and supports the sites selected in the SMP for offshore renewables development. Within this context it should be recognised that the sites identified within the current SMP should not be viewed as the totality of offshore wind possible in Scottish waters. As such, provision should be made within the NMP to accommodate and support the evolution of the SMP over time.

Scotland's Marine Assessment 2020 mentions the 142% increase in offshore renewable generation between 2014-2018, but this was from a very low baseline. The above figures help illustrate the scale of the change ahead, with the economic and environmental benefits that this offers for the blue economy.

At this early stage of consultation, we would also like to highlight the importance of drawing down these high-level themes such as climate change and ocean acidification into evaluative criteria so that they form a tangible part of decision-making on environmental impacts.

**Do you agree that these matters and their impact on the management of co-existing activities in the marine environment point to the need to begin work to replace the NMP?**

We do support this conclusion. The National Marine Plan needs to reflect the most current challenges and opportunities facing Scotland.

However, we also caution that the inevitably lengthy process to update the NMP cannot be a substitute for more immediate action to facilitate speedy deployment of offshore renewables. To secure a strong pipeline of offshore wind projects and build up an indigenous supply chain to deliver jobs, developers need greater certainty about timescales and decision-making from regulators.

It is currently unclear what role and status the Blue Economy Action Plan will have sitting alongside the Offshore Wind Policy Statement and other economy-wide initiatives, but industry would welcome any opportunity to contribute to the development of the Plan.

**To discuss further, please contact Ben Miller, Senior Policy Manager, Scottish Renewables: [bmiller@scottishrenewables.com](mailto:bmiller@scottishrenewables.com)**