

**SR/SOWEC Barriers to Deployment**  
**Risk 2: Strategic Marine Spatial Planning**

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August 18, 2025

Sectoral Marine Planning Team  
Scottish Government  
Victoria Quay  
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Dear Lucy Law,

**Response to: Scottish Government consultation on the Draft Updated Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE) (May 30, 2025)**

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead 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. We represent over 380 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies in Scotland, the UK, Europe and worldwide, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

Scottish Renewables welcomes the long-awaited publication of the Draft Updated Sectoral Marine Plan (SMP) for consultation and the opportunity to provide our views. This presents a timely opportunity to boost investor confidence, as well as make consenting more efficient at the peak of offshore wind consenting applications submission, so it is vital to get the new SMP, and the processes and governance that underpin the SMP right within the next six months. We welcome the recognition by the Scottish Government of the importance of clear, efficient and predictable consenting processes and policies for unlocking national supply chain and economic benefits from ScotWind and Innovation and Targeted Oil and Gas (INTOG) deployment.

In response to this consultation, our members have highlighted the following key points and opportunities to strengthen the SMP which are covered in further detail in response to relevant consultation questions:

- 1. Clearer planning balance and stronger strategic direction for consenting:** To maximise the value of a new SMP in supporting efficient and clear decision making, the Draft Updated SMP itself should be strengthened to provide greater strategic direction and guidance to resolve competing spatial interests. This should include using the SMP assessment conclusions to confirm the general suitability of leased Option Areas and predicted cumulative impacts.

Our primary critique of the SMP is the absence of any policy direction about how competing interests are to be resolved. The “core objectives” of the SMP include maximising the delivery of low-carbon electricity from offshore wind farms in Scottish waters, but the SMP then goes on to list out all the risks and adverse impacts that could arise from achieving that aim. Where conflict arises between an offshore wind farm and fisheries interests, for example, only limited guidance is provided as to how that conflict is to be resolved. Our members agree that the SMP should be clear that mitigation should be proportionate to the effect identified and balanced against the overall policy objective of maximising the generation of renewable electricity as set out in the current Scottish Government consultation, which would see Scotland’s offshore wind ambition increased up to 40GW by 2040.

As drafted, the draft updated SMP currently adopts a passive tone and lacks strategic direction. Our members note it is mostly procedural and signposts to the assessments and impacts predicted within these, but the SMP itself does not yet provide clear conclusions, recommendations or provide policy judgements. This represents a missed opportunity to confirm the general suitability and acceptance in principle of ScotWind and INTOG projects at plan-level, which would both enhance investor confidence and streamline project-level consenting for the benefit of all parties.

- a. The Draft Updated SMP signposts individual assessment findings but does not provide a clear conclusion regarding either the level or acceptability of impacts from each Plan Option, region or nationally. The final SMP should set out clearer conclusions regarding the acceptability of the environmental impacts predicted through the plan-level assessments and explain what this means for the consenting of individual projects.
- b. The SMP and associated assessments should be capable of concluding at plan-level that the selected Plan Options, which by now have already been assessed multiple times, are generally suitable for offshore wind development and that predicted cumulative impacts are generally acceptable. These fundamental questions should not then need to be reopened in each consenting process at project-level. This would allow the consenting of individual projects within Plan Options to focus on the acceptability of their scale, design characteristics, operational arrangements and interaction with other users and stakeholders. Doing so would improve proportionality within the consenting process whilst not diluting the scrutiny of proposals between the adoption of the SMP and the determination of consenting applications.
- c. To provide greater strategic direction, our members agree that the final SMP should therefore be bolder and based on a suite of post-adoption assessment statements, include clear conclusions regarding the general suitability of the portfolio of ScotWind Plan Options and clearer recommendations in respect of mitigation expectations.

## **2. Replace 10GW physical limit and maximum percentage coverage limits per Plan Option with an updated post-2030 deployment ambition:**

- a. We strongly welcome the shift of emphasis within the plan-level assessments away from considering installed capacity of generation (i.e. GW) as a proxy for potential environmental

impacts (as in the original SMP 2020), to instead focusing the Draft Updated SMP assessments on the spatial footprint of projects and on likely impact pathways from identified construction and operational activities. This provides a more nuanced and realistic basis of assessment while recognising that recent technological advancements have increased the per-turbine generating capacity of projects without necessarily increasing their spatial footprint or scale of environmental effects.

- b. It is therefore appropriate to remove the 10GW physical limit and maximum percentage coverage limits per Plan Option written into the extant SMP, and these changes are fully supported.
- c. Given that a GW cap on generating capacity is not an effective mitigation measure, our members also consider that the 10GW limit should be replaced by a new and more enabling post-2030 deployment ambition to underpin the new SMP. Taking account of [Scottish Renewables' response to the parallel consultation on the Scottish Government's Draft Offshore Wind Policy Statement Update](#) (June 2025), the final SMP should align with and incorporate the final version of this new ambition. It is recommended that the SMP Core objectives be updated to reflect and directly align with this. Doing so would provide an important and timely policy signal to help boost investor confidence and provide a strong strategic objective for the new SMP to deliver against. Notwithstanding some ambiguities in the proposed wording, we strongly welcome the Scottish Government's proposed new ambition for offshore wind.
- d. It is important to acknowledge the transformative economic impact which offshore wind developments can have on communities across Scotland through the creation of new, high-value jobs and opportunities for local supply chain companies.
- e. Coordination of and investment in the supporting infrastructure, which will enable multiple offshore wind projects by government and non-governmental organisations, is vital to maximise the benefits of the projects. Our members highlight the importance of ferry routes, airports, port access, roads, housing, and skills/training for maximising the benefits and minimising disruption for host communities.

### **3. Clearer identification of key consenting risks, issues and mitigation requirements per Plan Option and per region:**

- a. We welcome the stronger steer provided within the Draft Updated SMP and associated assessments to identify key consenting issues at regional and Plan Option levels. We also acknowledge the revisions made to some assessment methodologies and the caveats included to address concerns about over-precaution.
- b. Whilst refinements to the SMP assessments to address concerns raised by SR in February 2025 are welcome, these should be bolder and do not yet go far enough in areas such as fisheries, ornithology, ecology and tourism. As detailed in response to relevant questions, further refinements are needed to allow project-level consenting to focus on key points and avoid inflating minor issues or unsubstantiated claims of impact. It is strongly recommended that the final SMP assessments should also take into account the findings and recommendations of a Scottish Offshore Wind Energy Council (SOWEC) funded review of the application of precaution in assessments presently being undertaken by MacArthur Green on behalf of the SR/SOWEC Barriers to Deployment Group.

- c. We agree with the Scottish Government that the priority should now be to finalise and adopt the new updated SMP as quickly as possible, and that some technical issues identified with the current assessments supporting the Draft Updated SMP should not unnecessarily delay this.
  - d. Wording regarding the identification and expectations for the delivery of mitigation measures, as drafted, is unclear and needs to be clarified. The final SMP should set out clearer mitigation expectations, each of which should be informed by further stakeholder engagement and underpinned by robust evidence.
  - e. Whilst the draft updated SMP states that “mitigation measures are proposed”, it is not yet clear what status the measures listed within the document have, especially as it also states that “Proposed plan level mitigations identified through the assessment process may not necessarily apply to all projects”. No criteria or test are provided to determine when the application of identified mitigation may or may not be required. Greater clarity is required regarding mitigation expectations to ensure consistency and proportionality.
- 4. Undertake a proportionate Habitats Regulations Appraisal (HRA) and provide mechanisms to deliver strategic compensation:** We welcome the multi-stage approach being adopted to undertake the HRA Appropriate Assessment (AA) and the proposal to supplement the current qualitative and relatively generic HRA AA report with further quantitative assessment in Autumn 2025. It will be vital for this quantitative assessment to be proportionate and based on the best available scientific evidence, without resorting to unsubstantiated and highly precautionary assumptions. The conclusions drawn from the quantitative HRA should take into account the findings and recommendations of the SOWEC funded review of the application of precaution in assessments. Further clarity is needed regarding how plan-level compensation requirements included within any plan-level Derogation Case will be translated to project-level consenting.
- 5. Alignment with National Energy System Operator’s (NESO) Offshore Co-ordination Strategic Assessments:** We acknowledge that grid connection infrastructure for ScotWind and Innovation and Targeted Oil and Gas (INTOG) projects is not considered within the Draft Updated SMP and associated assessments, as this is presently being assessed separately by NESO. It is recommended that the final SMP and associated post-adoption statements should take account of NESO’s expected consultation on Offshore Co-ordination Strategic Assessments in order to demonstrate that potential locational and cumulative impacts are acceptable in planning and environmental terms.

It is understood that the concerns and matters raised by our members, as outlined below, will be fully considered. SR members would welcome further opportunity to engage and clarification from the Scottish Government on further planned workshop(s).

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our consultation response and accompanying analysis in more detail.

Yours sincerely,



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Scottish Renewables

## Map of Regions, Option Areas and Key Considerations within the updated Sectoral Marine Plan for Offshore Wind Energy – [View Here](#)

Development of offshore wind energy should take account of the key considerations through project design, project level assessment and decision making. This interactive map highlights any key considerations specific to the regions present in the Updated Sectoral Marine Plan for Offshore Wind Energy. Regional boundaries and Option Areas are shown in the map, select these areas to find out more information on them.

### RESPONSE TO CONSULTATION QUESTIONS:

**1. Do you agree that up to 1 Gigawatt (GW) of Test and Demonstration projects should be included within the scope of the updated Plan? Please provide any comments you have on their inclusion or proposed parameters.**

Extract from "Parameters - Test and Demonstration Projects" section of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

No more than a total of 1 Gigawatt (GW) of installed capacity for Test and Demonstration (T&D) projects should be leased. This capacity should be equally available in each of the five regions outlined in this draft updated Plan (West, North, Shetland, North East, and East), with no more than 200 MW leased per region.

Any project will be subject to Crown Estate Scotland (CES) leasing processes. Sites are likely to be relatively smaller (no larger than 100 Megawatt (MW) of generation capacity) and they should not be located in a site already covered by an existing CES Seabed Agreement or in a Marine Protected Area (MPA). The rationale (purpose, aims and objectives) with the purpose of any T&D project will need to be clear. Potential rationales could include research on components or whole turbine technology in an 'at sea' environment, testing of technology types, or certification of offshore wind infrastructure. However, this list is for guidance only and not intended to be exhaustive or restrictive. The site identified should be within a single contiguous boundary and be of a scale proportionate with the proposed activity.

Any proposals for T&D projects are subject to the standard marine licensing and s.36 consenting processes (where appropriate) including project level environmental and other assessments.

**Mostly Agree / ~~Yes~~ / ~~No~~ / ~~Don't know~~**

Test and demonstration (T&D) capacity plays an important role in derisking innovative technologies and enabling future offshore wind deployment. Including up to 1GW within the SMP scope could provide regulatory certainty for innovation zones and align with broader industry strategy. Our members agree with the principle of enabling T&D projects, and any parameters should be sufficiently flexible to support emerging floating offshore wind (FLOW) technologies, novel deployment approaches, and new strategies. Strategic coordination with the Innovation and Targeted Oil and Gas (INTOG) leasing framework will also help maximise benefits.

It is important to acknowledge that this represents a proposed new plan component, and that individual T&D areas have not yet been identified, unlike the ScotWind Plan Options, which already form part of the extant SMP and thus the 'planning baseline' for a new SMP.

However, some members do not support the addition of 1GW of new FLOW T&D capacity. While recognising the need for FLOW T&D projects, members highlight that to effectively unlock ScotWind FLOW projects, they must be delivered on a faster timescale than would be possible through newly leased seabed. It is recommended that the Scottish Government and industry should instead focus on bringing forward existing planned INTOG T&D projects and progressing larger 400 – 600 MW “stepping stone” projects within already leased areas. A prolonged phase of ~100 MW T&D projects could be at odds with ScotWind messaging, create uncertainty about when ScotWind FLOW projects will achieve first power, and risk Scotland losing its ‘early mover’ advantage in FLOW deployment. Additionally, members are concerned that further leases could reduce available compensation ‘headroom’ and place greater pressure on grid connection dates. Members suggest that there is already sufficient capacity within existing leased areas to deliver the necessary FLOW T&D and stepping stone projects.

**2. Do you have any comments on how the benefits of offshore wind development could be maximised? If referring to development within a certain region, please specify.**

The full potential of Scotland's offshore wind sector can only be realised through sustained partnership working by a wide range of stakeholders, including but not limited to the Scottish and UK Governments, to create a positive investment climate and tackle key barriers to deployment. SR members agree that benefits can be maximised by embedding the Scottish Government's proposed 40GW deployment ambition (see [Scottish Renewables response](#)) within the SMP, aligning with NESO's coordination assessments, and providing clear strategic conclusions on the suitability of Plan Options. This will enable developers and supply chain stakeholders to make confident investment decisions. A more predictable consenting framework, enhanced policy clarity, and timely infrastructure investment, particularly in ports and manufacturing, will further unlock local supply chain growth and long-term socio-economic value. In addition, by maximising offshore renewables deployment, emissions and climate change impacts are reduced.

**3. Do you have any comments on how social impacts could be mitigated?**

Further information can be found in the "Key Outcomes of Plan Level Assessments" and "Implementation of Mitigation Measures" sections of the draft plan, and in the plan-level social and economic impact assessments.

SR members are concerned that wording within the SMP and associated assessments regarding expectations for the delivery of mitigation measures is ambiguous. The final SMP and associated post-adoption statements need to set out clearer mitigation expectations, each of which should be informed by further stakeholder engagement and underpinned by robust evidence.

We recommend that outstanding issues and concerns with the Social and Economic Impact Assessment (SEIA), which accompanies the Draft Updated SMP, including with respect to mitigation measures, should be addressed through the publication of a SEIA Post Adoption Statement at the point that the new SMP is adopted. This would provide a proportionate and timely mechanism to address current concerns without delaying the adoption of the final SMP

Social impacts should be mitigated through early, inclusive and ongoing community stakeholder engagement, especially in remote and island areas. Skills development, retraining, and benefit-

sharing mechanisms should be embedded at plan-level, with alignment to the Scottish Government's just transition and fair work principles. In addition, SR members suggest the SMP should encourage consistent regional approaches to community engagement and foster collaborative frameworks for local benefit delivery.

#### **4. Do you have any comments on how economic impacts could be mitigated?**

Extract from the "Implementation of Mitigation Measures" section of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

Proposed mitigation measures identified in relation to avoiding or minimising impacts to other marine sectors, to be implemented at the project level, include:

- engaging early and meaningfully with other sectors, including fisheries and individual skippers, to ensure site design and layout facilitates continuation of other activities within arrays where practicable, and to ensure cable routing minimises potential impacts to other sectors
- utilising turbine foundations that minimise spatial footprint
- designing arrays according to relevant guidance to reduce constraints on shipping and aviation where necessary
- ensuring cables are buried to sufficient depth, or use of fishing-friendly cable protection to minimise snagging risks
- utilising smaller turbines in important tourism areas, and restricting storage, construction and maintenance of devices in key areas to reduce visual impacts

Further information can be found in the "Key Outcomes of Plan Level Assessments" and "Implementation of Mitigation Measures" sections of the draft plan, and in the plan-level social and economic impact assessments.

Economic disruption to other sectors, notably fisheries and tourism, should be addressed through a proportionate, evidence-based approach. The SMP should clearly distinguish between precautionary assumptions used for assessment purposes and actual policy positions. Our members agree that the SMP should not imply that fishing is excluded from Plan Options or mandate the payment of compensation for fishing disruption or relocation. Instead, the plan should support and facilitate sectoral coexistence wherever possible, while ensuring fair consideration of residual impacts. **See detailed comments relating to fisheries displacement assumptions provided in response to Question 16.**

Furthermore, it is essential to distinguish between fisheries impact assessment assumptions, which are likely to predict a reduction in fisheries activity within floating offshore wind farm arrays due to health, safety, and insurance concerns, and the Scottish Government's policy of promoting marine sectoral coexistence wherever possible.

#### **5. Do you have any comments on how environmental impacts could be mitigated?**

Extract from the "Implementation of Mitigation Measures" section of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

Proposed plan level mitigation measures in relation to avoiding, minimising or offsetting potential environmental impacts include but is not limited to:



- in replacement of the IPR process, any further planning to inform future leasing rounds should be based on robust analysis of the future environmental and socio-economic potential for future offshore wind development
- collaboration between governmental bodies, non-governmental organisations (NGOs) and industry, through existing research partnerships to establish a consistent and comprehensive evidence base
- strategic research to understand the extent and potential impact of Plan implementation on Nathusius' bats, to be undertaken through existing research initiatives
- identification of plan level compensatory measures for bird collision and displacement risks, subject to the conclusions of the HRA AA and Ministerial determination
- development of strategic compensation policy to support project level HRA considerations, subject to the conclusions of the HRA AA and Ministerial determination
- implementation of a Marine Recovery Fund in Scotland is being considered as a mechanism to facilitate the delivery of strategic compensation measures under the Habitats Regulations, if required
- encouragement of nature-positive offshore wind development where possible to help meet targets for the Scottish marine environment as set out in Scotland's Biodiversity Strategy to 2045
- a requirement on all developers to 'optimise' infrastructure layout associated with the OAs to minimise potential adverse effects on protected features (e.g. excluding or relocating turbines that contribute most to bird collision risk)

Proposed mitigation measures identified in relation to avoiding or minimising environmental effects, to be implemented at the project level, where relevant, include:

- requiring spatial planning or micro-siting within OAs to reduce effects on relevant environmental receptors
- requiring project level assessments to identify and mitigate project specific effects
- compliance with project level mitigation identified in the SEA, HRA and NCMPA assessment reports
- appropriate consultation with national and local statutory and public stakeholders
- modification of project specific turbine technology, array design and/or layout to minimise environmental effects (e.g. selection of smaller turbines in areas of higher sensitivity to visual effects)
- best practice methodologies and technologies, as well as appropriate management planning, should be used to minimise potential significant effects during installation
- preparation and implementation of a decommissioning programme, detailing how a developer intends to remove the installation when it comes to the end of its useful life and how the costs of doing so will be funded. This programme should include a base case of all infrastructure being removed, alongside any alternatives that the operator proposes, backed up by evidence and reasoning for the preferred option
- minimising use of cable protection measures by maximising burial in sediment and minimising overall length of cable where possible. Any required cable protection should be implemented and monitored throughout the lifespan of a project

Further information can be found in the "Key Outcomes of Plan Level Assessments" and "Implementation of Mitigation Measures" sections of the draft plan, and in the plan-level environmental assessments.

Environmental impacts should be mitigated through clearer plan-level guidance, informed by robust evidence and stakeholder input. The SMP must avoid embedding overly precautionary assumptions and should provide proportionate expectations for mitigation and strategic compensation. SR members support the principle of strategic marine environmental enhancement and encourage the promotion of nature-inclusive design, adaptive management, and spatial optimisation. These measures will support both ecological outcomes and the long-term viability of higher-capacity projects.

Furthermore, the draft updated SMP signposts individual findings but does not yet provide a clear conclusion regarding either the level or acceptability of impacts from each Plan Option, regionally or nationally. It is recommended the final SMP sets out clearer conclusions through the plan-level assessments and explains what this mean for the consenting of individual offshore wind projects.

**6. Do you think the monitoring of environmental impacts of the draft Plan should be overseen by existing expert groups, or should a new expert advisory group be established for this purpose?**

Extracts from the "Monitoring" and "Governance" sections of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

In order to monitor and mitigate any significant adverse environmental effects of implementing the updated SMP-OWE a plan-level monitoring programme has been recommended through the Strategic Environmental Assessment (SEA). The SEA suggests that this could be informed by resources available at project, regional and national level, existing licensing authority reporting tools, pre- and post-consent documentation, and outputs of strategic research programmes.

Indicators could be identified and proposed within the SEA post-adoption statement, aiming to draw upon existing monitoring regimes where possible. Environmental impacts expected to be monitored at plan-level include impacts on marine mammals and seabirds.

In relation to plan-level monitoring, it is suggested that existing receptor groups, such as those established for the Scottish Marine Energy Research (ScotMER) programme, could be utilised to oversee the monitoring of the environmental effects of plan implementation and the success of any implemented mitigation measures. Alternatively, a new tailored working group could be established comprising experts from across different relevant environmental fields.

Further information can be found in the "Monitoring" and "Governance" sections of the draft plan.

**Existing group(s) / ~~New group(s)~~ / ~~Don't know~~**

Existing expert groups should be utilised to maintain continuity and avoid duplication. This should include the continuation of the Scottish Government's SMP Steering Group, including developer representation of the offshore wind sector, and the Scottish Marine Energy Research (ScotMER) Programme. However, coordination needs to be strengthened. A dedicated main planning advisory function, potentially embedded within existing governance, could support monitoring, adaptive management, and strategic research delivery. This function should ensure transparency in post-adoption evidence reviews and integrate input from marine users and environmental NGOs. Clarity is required around any expectation that industry will fund future plan-level monitoring, with a clear explanation of how monitoring information will be used to inform plans and projects. Industry representation on government-led groups will be essential.

## **7. Do you have any comments on the proposed changes to the SMP-OWE governance structure?**

Extract from the "Governance" section of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

A formal governance structure is required to support the implementation of the final plan. The proposed roles and responsibilities of groups involved are outlined below.

- Scottish Ministers are responsible for: approving and adopting the plan, approving amendments and/or updates to the plan, making decisions on applications for licences and consents required for the construction and operation of offshore wind projects. The final decision-making power rests with Scottish Ministers.
- the Offshore Wind Executive Board is responsible for: considering advice and evidence received from the SMP-OWE Steering Group, seeking external advice as appropriate.
- the SMP-OWE Steering Group is responsible for: will be approached as needed in the event of additional evidence being required to inform a planning decision.
- ScotMER Receptor Groups are responsible for: the role of ScotMER in the delivery of monitoring of environmental effects and outcomes of environmental mitigation measures is being explored.

The groups established to support the governance of the previous SMP-OWE (2020) have been formally disbanded. Members of the disbanded Technical Advisory Group, Sectoral Evidence Group and Ornithological Working Group have been invited to sit on the updated SMP-OWE Steering Group. The role of the previous Sectoral Planning Programme Board has been adapted and now sits with the Offshore Wind Executive Board.

Further information can be found in the "Governance" section of the draft plan.

The proposed governance changes are welcome but should go further in assigning responsibility for determining the acceptability of cumulative impacts and providing strategic mitigation guidance. The SMP governance structure should ensure transparent oversight of how plan-level conclusions are translated into project-level expectations, particularly in terms of mitigation, coexistence, and compensation. Our members note that participation of industry bodies such as Scottish Renewables in appropriate steering group(s) is a crucial vehicle for the Scottish Government and stakeholders to continue constructive engagement.

## **8. Do you have any suggestions for how evidence should be shared and/or fed into strategic research programmes?**

Extract from the "Evidence" section of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

- the draft updated SMP-OWE takes account of the latest evidence, at the time of plan preparation, in relation to environmental and socio-economic impacts
- as the deployment of offshore wind energy expands, further survey and monitoring data and research will become available, which will be used to inform industry best practice and standards, including plan- and project-level impact assessment methodologies
- new evidence, which may rise as a result of technological advances, scientific research or project-level assessment and monitoring is encouraged to be shared and fed into relevant

Further information can be found in the "Evidence" section of the draft plan.

Evidence-sharing should build on collaborative platforms and the work of groups such as the SR/SOWEC Barriers to Deployment Group. The SMP should formally link to strategic research programmes such as ScotMER and ensure transparency on how precaution is applied and challenged. Outputs should directly inform future assessments and policy adjustments.

Our members welcome the acknowledgement (page 9) regarding precautionary assumptions within the assessments and the recognition of the need to take further action to reduce over-precaution through evidence-based approaches. SR welcomes the SOWEC-funded review of precautionary approaches in assessments and strongly encourages the SMP to take full account of its findings and recommendations, once finalised.

**9. Do you agree with the approach proposed to remove the iterative plan review process and replace it with the stated evidence and future planning proposals?**

Extract from "Future Planning" section of draft updated Sectoral Marine Plan for Offshore Wind Energy:

- it is proposed that the updated SMP-OWE is not subject to iterative plan review. Under this proposal, no further iterations of the plan to cover ScotWind and Innovation and Targeted Oil and Gas (INTOG) sites are anticipated
- any new evidence, including the outputs of strategic research programmes, will inform any future assessment of impact, advice and decisions accordingly
- any future commercial-scale leasing for offshore wind in Scotland is proposed to be subject to a new and distinct sectoral marine planning process. This will continue to be informed by any new and relevant information and research regarding the environmental, economic and social impacts, both positive and negative, of offshore wind development and the effectiveness of any mitigation measures

Further information can be found in the "Future Planning" section of the draft plan.

**Yes / No / Don't know**

Our members support replacing the iterative plan review process with a new evidence-based update plan process if there is a need for new leasing. However, clear criteria and triggers for future review must be established to avoid regulatory uncertainty. For example, a clearly defined mechanism should be included for updating Plan Options in response to major environmental evidence reviews or spatial planning development, such as the National Marine Plan 2 (NMP2).

The Scottish Government's new offshore wind ambition (including a sub-ambition for floating offshore wind) should, once finalised, be stated within Core Objective 1 of the final SMP, which should be adopted as soon as possible.

This approach would allow a new Offshore Wind Policy Statement to focus on delivery of Scotland's offshore wind ambition through addressing barriers to deployment and accelerating innovation. The next Offshore Wind Policy Statement should also take into account and address the implications of the emerging UK Strategic Spatial Energy (SSEP) in relation to an expected need for further leasing and deployment of offshore wind beyond the current development pipeline to achieve net-zero emissions targets.

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

The SMP should replace outdated GW caps with a strategic post-2030 deployment ambition of 40GW, aligned with the Scottish Government's Draft Offshore Wind Policy Statement. Core Objective one should be revised to reflect this.

**It is recommended that the final updated SMP should also:**

- Finalised in tandem with the Scottish Government's Offshore Wind Policy Statement (OWPS). Instead of waiting for a full new OWPS, the finalised ambition should be embedded in the final SMP as a key objective, with the next OWPS then focused on thematic barriers and opportunities to help deliver the new ambition.

This would be appropriate given that the SMP has assessed the environmental impacts of the current pipeline of ScotWind and INTOG projects (37.4GW + 30% high scenario uplift). Without prejudice to the consideration of specific impacts through project-level consenting applications and assessments, the final SMP should provide clearer conclusions regarding the acceptability in planning and environmental terms of the cumulative environmental impacts that have been assessed.

The inclusion of a finalised updated ambition within the new SMP would provide a strong basis to confirm that the assessed Option Areas (ScotWind + INTOG) are not 'reasonable alternatives' to each other. The position to date of Plan Options apparently being reasonable alternatives to each other pre-dates this and is not consistent with a new ambition being set to guide the SMP. It is also inconsistent with the approach taken in recent consenting decisions (Greenvolt, West of Orkney, Salamander) and risks projects within different Plan Options potentially being played off against each other through project-level consenting and the application of the Alternative Solutions test, where a derogation is required under the Habitats Regulations.

- Include the OWPS ambition of up to 40GW offshore wind ambition to safeguard the status in the emerging NESO Strategic Spatial Energy Plan (SSEP) of ScotWind projects due for deployment after 2030 and to guide the SSEP to contribute to a supportive policy framework for offshore wind deployment in Scotland;
- We welcome the updates made to strengthen the stated aims and objectives of the Draft Updated SMP. These aims appropriately recognise that the SMP needs to provide a strategic spatial framework and is first and foremost a spatial plan, supported by a suite of assessments, rather than the assessments being the main output. However, we are concerned that the Draft Updated SMP itself adopts a relatively passive tone and, as currently drafted, lacks the strategic direction expected of a national spatial plan. This points to a need for the final SMP itself to provide clearer conclusions (e.g. regarding predicted impact acceptability, confirm the acceptability of assessed cumulative impacts and the general suitability of Plan Options), policy views and strategic direction to boost investor confidence and add value to the consenting process, in line with proposed SMP Aim 6;
- Reflect NESO's coordination outcomes and align with other relevant policies such as the National Planning Framework 4 (NPF4) and the Clean Power 2030 Action Plan (CP2030);
- The updated SMP should also introduce clear links to marine spatial prioritisation policies within the Draft National Marine Plan 2 (expected Winter 2025) and provide clear conclusions

regarding the acceptability of predicted impacts from offshore wind development within the identified Plan Options. This would allow NMP2 to recognise the principle of development for and confer a degree of planning acceptability of offshore wind development within these leased Plan Options and to then set out a clear spatial prioritisation policy;

- Incorporate refinements to Plan Option boundaries and capacities where updated: acknowledging that the spatial boundaries and expected capacities of some projects within existing Plan Options have been refined after the assessments were conducted in response to surveys, stakeholder engagement and grid connections requirements. Where project boundaries have been refined, this is likely to reduce some environmental and socio-economic impacts to levels below those predicted in the assessments, which currently support the draft updated SMP. The inclusion of a high scenario with 30% uplift in capacity appropriately recognises that some projects are seeking to take advantage of technological advancements since the ScotWind leasing round took place in 2020 and higher project capacities are now proposed.
- Include a conclusion and recommendations section. Ensuring these conclusions and recommendations are communicated and visible to developers, regulators and wider stakeholders through a strengthened governance structure and clearer plan text.

**11. A policy review has identified that no aspects of the draft plan will impact on children's rights, as outlined briefly in Annex C. Do you agree with these findings? If you have identified any impacts on children's rights and/or wellbeing, please explain.**

Extract from Annex C of the draft updated Sectoral Marine Plan for Offshore Wind Energy:

In line with the recommendations of UNICEF and the UN Convention on the Rights of the Child (UNCRC), and under the UNCRC (Incorporation) (Scotland) Act 2024, the Scottish Government is carrying out a Child Rights and Wellbeing Impact Assessment (CRWIA). The UNCRC has 54 articles and 3 optional protocols that cover all aspects of a child's life and set out the civil, political, economic, social and cultural rights.

The preparation of CRWIA is underway to help understand whether the updated SMP-OWE is compatible with the UNCRC requirements and what the anticipated impacts of the updated SMP-OWE are. The findings of the steps of the CRWIA will allow for the enhancement of potential impacts and mitigation of negative impacts in the adopted updated SMP-OWE.

Evidence from existing research and reports, such as the Social and Economic Impact Assessment (SEIA), indicate that no aspects of the updated SMP-OWE are relevant or will impact on children's rights as the draft updated Plan sets the spatial parameters for offshore wind development and is expected to impact on industries rather than directly impact individuals. To further support the understanding and assessment of potential impacts of the updated SMP-OWE on children and young adults, with reference to the UNCRC, we are seeking your thoughts through this consultation.

**Yes / No / Don't know**

If you have identified any impacts on children's rights and/or wellbeing, please explain.

Our members have not identified any specific impacts on children's rights or wellbeing.

However, we believe it is essential that our oceans are considered a stakeholder in all marine policy. The long-term health and stewardship of marine ecosystems and renewable energy generation are critical to securing a sustainable and equitable future for the next generation, and therefore, intrinsically linked to children's rights and wellbeing.

**12. Do you have any comments on the partial Business and Regulatory Impact Assessment?**

Please ensure you have read the [partial Business and Regulatory Impact Assessment](#).

The Business and Regulatory Impact Assessment's (BRIA) recognition of offshore wind's strategic economic value is welcome. However, it should better reflect the long-term investment opportunities across the supply chain, including those enabled by increased fixed and floating offshore wind deployment in Scottish waters, predictable consenting, and infrastructure upgrades. Greater visibility of these opportunities would support workforce planning and help mitigate manufacturing investment risk.

**13. Do you have any comments on the partial Island Communities Impact Assessment?**

Please ensure you have read the [partial Island Communities Impact Assessment](#).

Our members support continued engagement with island communities, who are important stakeholders in delivery. The Island Communities Impact Assessment (ICIA) could better reflect regional opportunities from project-related investment and long-term infrastructure benefits. Enhanced island grid connections and skills programmes offer significant potential for community benefit. Our members welcome the additional island focus of the consultation, which has helped to ensure that island-specific factors are considered by the Scottish Government in this process.

We note that the partial ICIA has been informed by only limited stakeholder engagement focused on local authorities rather than wider community groups.

We do not agree with the assessments of potential impacts on tourism and recreational angling set out within the SMP Social and Economic Impact Assessment (SEIA) and summarised within the partial Island Communities Impact Assessment. Please refer to our response to question 16.

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

Please ensure you have read the [Strategic Environmental Assessment Environmental Report](#).

SR members agree that the Strategic Environmental Assessment (SEA) Environment Report must not delay plan finalisation. Identified issues, such as the consideration of reasonable alternatives, changes to project boundaries, the inappropriate use of historical regional data to make baseline and impact assessment findings at the Plan Option level, and the need to clarify mitigation expectations, should all be capable of being addressed through factual updates within a SEA Post Adoption Statement. SR members are of the view that these matters can be resolved through factual updates without the need to re-run and re-consult on the SEA Environmental Report. The updated SMP must also ensure that SEA mitigation measures are clearly defined and proportionate, with transparent applicability criteria.



The new SMP and associated SEA Post Adoption Statement should acknowledge that refinements have been made to some project boundaries since the assessments were undertaken, with the result that previously predicted impacts may have been reduced or removed.

SR members are concerned that Section 6.6 - Concluding Statement of the SEA Environmental Report does not use the wealth of evidence presented within the report to draw any final conclusions as to impact level or acceptability. This conclusion should be extended within the SEA Post Adoption Statement to provide stronger and more direct findings to allow the SMP itself to provide clear conclusions and recommendations.

Many of the worst-case scenario assumptions outlined in Table 7 are overly precautionary and in some cases, entirely unrealistic. No project would ever be proposed (or consented) using all of the worst-case assumptions combined or even some of them. Their inclusion risks generating confusion amongst communities and stakeholders, especially when reviewing project applications. We are concerned that these assumptions remain unchanged from the draft SEA Environmental Report, when SR raised this concern on behalf of members.

Taken together, the assumptions present an unrealistic narrative that offshore wind development would necessarily lead to a range of significant adverse effects, when there is no evidence available to suggest this would be the case. Further, no consideration appears to have been given in Table 7 to the robust application of the mitigation hierarchy to avoid and minimise impacts through siting, design and EIA processes, yet the National Planning Framework 4 (NPF4) and other related policies already mandate such an approach. Some of the SEA assessment findings are therefore disproportionate and unrealistic, which will not support proportionate or effective consenting at project-level.

With reference to Section 6.2 - Project Level Mitigation of the SEA Environmental Report, consideration of the role of project-level applications and EIAs should also recognise that existing and emerging policy sets relevant criteria and thresholds of impact acceptability and mitigation requirements, which will inform the undertaking of EIAs and identification of mitigation measures as part of this.

We are concerned that the statement in paragraph 6.2.2 regarding expectations for the implementation of mitigation identified through this SEA is ambiguous. In the final SMP and SEA Post Adoption Statement, this needs to be clarified and should set out clearer mitigation expectations, all of which should be informed by further stakeholder engagement and underpinned by robust evidence.

**Mitigation measures:** the wording regarding the identification and expectations for the delivery of mitigation measures, as drafted, is unclear and needs to be clarified. The final SMP should set out clearer mitigation expectations, each of which should be informed by further stakeholder engagement and underpinned by robust evidence. Whilst the draft updated SMP states that “mitigation measures are proposed”, it is not yet clear what status the measures listed within the document have, especially as it also states that “Proposed plan level mitigations identified through the assessment process may not necessarily apply to all projects”. No criteria or test are provided to determine when the application of identified mitigation may or may not be required. Greater clarity is required regarding mitigation expectations to ensure consistency and proportionality.

**Plan level mitigation** (Page 51): our members highlight that the proposed plan level mitigation measures are listed, and whilst there is a caveat stating that these may not necessarily apply to all projects, the last measure is problematic:



*“A requirement on all developers to ‘optimise’ infrastructure layout associated with the OAs to minimise potential adverse effects on protected features (e.g. excluding or relocating turbines that contribute most to bird collision risk).”*

- a. the requirement is to “minimise”, i.e. reduce as far as possible. This introduces a need to demonstrate that projects could not have gone any further, irrespective of whether implementing a particular measure is proportionate to the harm predicted to arise;
- b. it applies to “potential adverse effects”, not to “likely significant adverse effects”. This requirement is therefore wide-reaching and could apply to adverse effects, irrespective of their significance or likelihood of occurring; and
- c. the example given would be difficult to achieve. As we understand collision risk modelling, turbine layout is not an input parameter, so it would be difficult to identify from the model which turbine is contributing the most to the predicted collisions.

**Project level mitigation** (Page 52): similarly sets out the mitigation measures to be implemented at project level where relevant. Of particular note are:

- a. Modification of project specific turbine technology, array design and/or layout to minimise environmental effects (e.g. selection of smaller turbines in areas of higher sensitivity to visual effects). Again, the reference to “minimise”, rather than simply reduce, has the potential to give rise to the need to implement mitigation that is disproportionate to the harm predicted.
- b. “Utilising turbine foundations that minimise spatial footprint” – particularly key for floating offshore wind. In reality, the choice of technology will need to be driven by ground conditions, supply chain, and what is available, rather than a policy requirement to reduce spatial footprint.
- c. Several references to using smaller turbines in important tourism areas or areas where there are sensitive visual receptors. Again, this contradicts previous policy statements that specifically acknowledge that turbines are getting taller, with greater generation capacity, and the renewable energy benefits that brings. Our members also note that taller turbines will mitigate effects on other environmental receptors, e.g. ornithology. Again, this highlights the need for the policy to strike a balance between the relevant competing interests.
- d. Project level mitigations should not be prescriptive at SMP level, our members agree it would be more constructive to say that appropriate mitigation measures may be required at project level without stating what they need to be (for all projects). The items a-c could be listed but clearly identified as example that would only need to be deployed where required.

We are concerned that the SEA Environmental Report does not adequately recognise the difference between strategic assessments at plan-level and more detailed assessments at project-level. There is a fundamental difference in the identification of likely significant effects between plan and project levels. Uncertainties at plan-level need to be carefully caveated to avoid generating disproportionate project-level assessments and consenting applications and implying that specific issues are likely to occur at project level when there is insufficient evidence available to suggest so.

**15. Do you have any comments on the Habitats Regulations Appraisal Appropriate Assessment Information Report?**

Please ensure you have read the [Habitats Regulations Appraisal Appropriate Assessment Information Report](#).

SR members broadly support the new approach being taken for the SMP Habitats Regulations Appraisal (HRA), with the proposed quantitative seabird impact assessment postponed until October 2025 to allow for a more considered methodology to be implemented. Our members agree that this could lead to more proportionate outcomes with lower compensation requirements. However, SR members would welcome greater transparency and input to the quantitative assessments, in order to provide reassurance that the final SMP HRA will not embed over-precaution, resulting in unnecessarily high compensation requirements.

It is critical for this proportionate, evidence-led approach to avoid embedding precautionary assumptions that could unnecessarily trigger compensation requirements for both the plan and projects. It is also recommended that the final assessment provides clarity on how plan-level compensation will relate to project-level compensation and consents.

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

Please ensure you have read the [Social and Economic Impact Assessment report](#).

Our members are supportive of efforts to assess and communicate the potential socio-economic impacts of offshore wind development. SR members support the approach of using the Option Areas agreed with Crown Estate Scotland, rather than necessarily full plan options from the 2020 SMP, as the starting point of the spatial analysis to assess impacts within the SEIA and other assessments. However, this fails to reflect subsequent refinements in the development of ScotWind projects within the Option Areas, including publicly available data at the assessment cut-off date (September 2024).

Refinements to the SMP assessments to address SR member concerns raised since February 2025 are welcome. However, our members continue to have significant concerns relating to the current treatment of fisheries and tourism impacts in the Social and Economic Impact Assessment (SEIA), which we believe undermines the credibility of the overall assessment. Further refinements are needed to allow project-level consenting to focus on key points and avoid inflating minor issues or unsubstantiated claims of impact.

The SEIA currently overstates some impacts, particularly those related to fisheries displacement and tourism. SR members strongly recommend these issues be revisited in the Post Adoption Statement, informed by the latest evidence and the principles of coexistence and adaptive management. A clearer distinction should be made between theoretical maximum impacts and realistic outcomes, especially in floating offshore wind contexts where colocation may be viable.

Our members disagree with the SEIA assumption that all fishing activity ceases within floating arrays and is not displaced elsewhere (i.e. activity ceases to take place at all). We do not think this assumption should be made without more supporting evidence, and in fact there is contrary evidence which we understand has been previously provided by Scottish Renewables and offshore wind developers to the Scottish Government. Project specific assessments will refine the conclusions during the consenting process, so it is inappropriate and unnecessary for specific mitigations to be ascribed to individual projects in the SMP-OWE or its SEIA.

## **Fisheries**

The assessment sets out the potential direct GVA impact on commercial fisheries. SR members strongly disagree with the assumptions used for the assessment, as while they are meant to represent the worst-case scenario, these are not realistic nor seem to be based on fishing activity data, and such an assumption could be detrimental to the floating offshore wind sector.

This response provides arguments against the assumptions used, and the lack of robustness of the evidence behind them, this counts for both fixed and floating developments. For this, it is assumed that all fishing ceases in floating arrays and there is a reduction in fishing activity returning to fixed-bottom arrays. As stated in the SMP SEIA, this assumption '*was agreed with fishing industry representatives and is based on individuals perceived experience while fishing in and around existing wind farm developments*'. The SMP states that after construction of Seagreen, the scallop fishery returned, but they were only able to fish for one month, compared to a three-month fishery previously in the area (Scottish White Fish Producers Association, *pers. comm.*). This statement is not supported by data from a monitoring programme conducted by the developer to understand scallop dredging activity within the operational phase of the windfarm. Preliminary data indicates the scallop fishery returning to the site over a five-month period. This coincided with an increase in East Scotland scallop landing weight over the same time period. Further analysis is required to understand if the two are intrinsically linked. In addition, the SMP does not present supporting data for the assumption of a reduction in potting activity; to date, there has not been any reported reduction in static fishing effort in existing wind farms in Scotland.

There is no reference to the previous SMP (2020), and the feedback received from the fishing industry. The Scottish Fishermen's Federation (SFF) identified areas within option areas that would be their preferred areas for development, many of which overlap ScotWind option lease agreement areas, such as Morven Offshore Wind Farm. The fishing industry previously provided detailed feedback to the SMP (2020) and during the period between scoping and adoption of the plan. Our members note that many Plan Option areas were modified to accommodate fishing. This is relevant information that should be recognised in the SMP that will be updated and adopted.

Our members welcome the continued engagement with the fishing industry. However, while the assumption that floating arrays themselves are no mobile fishing zones and this is considered a reasonable worst-case assumption to allow strategic assessment, we reject the assumption that any fishing displaced from floating arrays does not occur elsewhere, thus ignoring the mobile nature of some stocks and fishing activities. For instance, mobile fishers will likely fish alternative grounds with recent research demonstrating that this displacement has limited economic impact to the sector as a result of 'No Fishing Zones' (Costello, 2024).<sup>1</sup> Furthermore, it has been shown that static gear could coexist with floating wind arrays. Further, individual projects will no doubt undertake detailed engagement with the sector to discuss and explore mitigation options. The assumptions used are therefore considered unrealistic and overinflate impacts arising for both fixed and floating arrays. The assumption that all fishing 'ceases' from floating arrays should be reviewed, and a more realistic assumption should be adopted.

The SMP should also clearly state that the assumption of no fishing taking place within full floating offshore arrays has been used to ensure assessment of potential worst case. As noted above, projects will engage with the sector to consider opportunities for colocation and coexistence to mitigate these impacts. If it is deemed that fishing is stopped and does not relocate, it could open the door for a mandatory compensation requirement.

From a fixed-bottom perspective, the SMP SEIA states, “*within fixed arrays, it is assumed that pots and traps are able to resume at 75% of previous activity and beam trawls and scallop dredges are able to resume at 33% of previous activity*”. The SEIA stops short of confirming the data source used to arrive at these figures. Like floating, there is an assumption that the fishing that ceases with fixed-bottom project will not be displaced to other areas. Spatial constraints vary from fishery, and not all areas that record fishing activity represent key fishing grounds. In addition, specific reference is made to beam trawls - this is not a fishing method typically used in Scotland and therefore has limited value to the SEIA. It would be helpful to understand how bottom otter trawling, which is of much more importance in a Scottish context, has been factored into the SEIA. If it has been assumed that bottom otter trawling cannot resume within operational fixed bottom sites, it would be important to understand this rationale.

The SMP at this stage does not present flexibility to deal with the precaution included in the assessment by using these assumptions. We recommend that moving forward, it should be a key component of the SMP’s associated research programme to collate empirical data on the economic impacts of offshore wind installations on the existing Scottish fleet based on historic data from existing operating wind farms and those about to commence construction. This will enable the ability to understand if the current fishing quotas and landings are obtained by impacted vessels to the same levels as before, once a wind farm is installed. In addition, analysis of vessel monitoring data would enable the sector to understand any increased or decreased transportation costs associated with fishing activities for those operators who operate in the region and may be impacted by the location of an offshore wind installation on existing activities. Further research around the presence and movement of key fished species within an option area and the area surrounding impacted Plan Options could also be used to inform the administration and development of any mitigations.

The Draft SMP states the following: “*Scoping strategic solutions with industry to offshore wind and fisheries co-existence issues including a number of actions such as skills and retraining opportunities and development of a **strategic fisheries fund***.” SR members note that a strategic fisheries fund is mentioned as a possible strategic solution to aid co-existence between offshore wind and fisheries. However, the draft plan stops short of providing any further detail on this strategic proposal. Our member’s question is the requirement to contribute to this fund, dependent on the offshore wind foundation type, i.e. fixed or floating? Given that the draft plan makes a clear distinction on impact between fixed and floating technology in terms of impact, it could be assumed that this would influence the need to access the fund. The requirement to feed into a fisheries fund would presumably be driven by the outcomes of the Commercial Fisheries Environmental Impact Assessment (EIA), i.e. if no significant impact is concluded on EIA terms, then no additional such mitigation should be required. Our member’s question is this indeed the case? Our members agree that the final adopted SMP needs to be clear on the criteria for such a fund, so that as projects mature, developers are clear on the likely financial obligations for their projects.

ScotWind developers within the East region have already voluntarily established a Commercial Fisheries Working Group (CFWG) with the sector to explore opportunities for data sharing and to discuss coordinated and strategic mitigations with an aim to facilitate colocation/coexistence where

possible. While this is being progressed on a regional basis, it would be beneficial to progress discussions at a national/strategic scale to identify potential solutions at a national level. Given the challenges for colocation between offshore wind and fisheries, it would be beneficial for the SMP to recognise these challenges and set out a process to identify and develop strategic mitigation solutions.

Lastly, there are examples where no fishing zones have been implemented and fishing activity has moved with limited impact on catch rates and landings. The assumption that fisheries displaced from floating and fixed bottom offshore arrays will result in the complete loss of those landings is considered unrealistic, without evidence and overly precautionary.

Additional reading material:

1. Study on the impacts from Lyme bay MPA
  1. Link: [https://pmc.ncbi.nlm.nih.gov/articles/PMC3357819/pdf/13280\\_2011\\_Article\\_154.pdf](https://pmc.ncbi.nlm.nih.gov/articles/PMC3357819/pdf/13280_2011_Article_154.pdf)
  2. Quote: "Preliminary analyses of landings data indicate that the introduction of the MPA has so far had minimal impacts on the average incomes and financial profits of fishermen and fish merchants."
2. Case study: Socio-economic impacts of marine protected areas - This is a Scottish Government Study that considered the economic impacts of no fish zones, in this instance for MPAs
  1. Link <https://marine.gov.scot/sma/assessment/case-study-socio-economic-impacts-marine-protected-areas>
  2. Key finding/quote - Fishing mostly moved and there was minimal impact on landings, apart from a few instances - "Total landings for these trawl vessels remained the same, or higher, apart from the relatively small proportion of fishers who had been particularly heavy users of the fishing grounds within MPAs, whose landings reduced by approximately 12% on average."
3. Evidence of economic benefits from marine protected areas (2023) Nord Universitet (Norway) - A review of dozens of impact assessments on No Fishing Zones from across the world
  1. Journal: Evidence of economic benefits from marine protected areas, Mark John Costello, 2024
  2. Key finding/quote - "There was no evidence of net costs of MPAs to fisheries anywhere."

## **Tourism**

The assessment of potential impacts on tourism presented within the SEIA is underpinned by a flawed and sweeping assumption that mere visibility of wind turbines automatically leads to reduced tourism activity and an associated reduction in spend, with knock on social and economic impacts. This is simply not supported by available evidence. Indeed, in relation to onshore wind where

turbines are sited much closer to potential tourism receptors than offshore turbines, the Scottish Ministers and their Reporters have repeatedly concluded there is no evidence of likely significant effects on tourism from wind farm development.

**See submitted in addition to SR's consultation response: *An Evidence-Based Review of Tourism and Angling Impact Methodologies Within the Scottish Draft Updated Sectoral Marine Plan for Offshore Wind Energy*:** Consideration of potential tourism impacts from offshore wind and the sources cited within the SMP SEIA to support the tourism methodology. (August, 2025).

## **1. Tourism Methodology Fundamentally Flawed**

The current methodology used to estimate tourism impacts is not just overly precautionary; our members agree that it is fundamentally flawed. The 1.3% figure retained in the SEIA is based on:

- An extrapolation from a 2007 perception study relating to onshore wind developments, not offshore;
- A geographic method that relies on the land area of civil parishes, which has no clear relationship with actual tourism activity or offshore visual impacts;
- An assumption that objections on landscape grounds correlate with meaningful impacts on tourism revenues, a link which is unproven and speculative at best;
- An unsubstantiated distance range projected from all offshore wind projects;
- Regionalising positive benefits while ascribing only negative impacts to specific projects.

This methodology was flagged as a serious concern by SR in our response to the previous draft SMP assessments, and our members are disappointed that it remains unaddressed in this consultation version.

## **2. Acknowledgement of Weak Evidence Base Welcome – Action Still Required**

We recognise and welcome recent actions taken by the Scottish Government, including:

- Commissioning additional research to explore the evidence base for offshore wind and tourism impacts;
- Reviewing numerous academic papers on this topic, which found no strong justification for the extrapolation of onshore perception data to offshore contexts;
- Acknowledging that the 1.3% figure is not robust and adding caveats to the SEIA to downplay its significance.

However, despite these caveats, our members note the headline number remains, and its continued presence lends unwarranted weight to a conclusion that lacks credible evidential support.

## **3. Recommendations**

In light of the above, we strongly recommend the following actions be taken before the SEIA is finalised:

- Remove the 1.3% figure unless new, offshore-specific evidence can robustly justify its inclusion. If the additional research is not completed in time, the 1.3% calculations should be removed unless and until evidence supporting it is eventually produced.
- Clearly separate and contextualise any findings based on onshore data, ensuring they are not used to inform offshore conclusions without explicit justification.
- Commit to a transparent revision of the tourism methodology based on the findings of the newly commissioned evidence review and consult further on any future quantification of tourism impacts.

Our members agree that the inclusion of unjustified quantification risks distorting perceptions of impact and could hinder public and stakeholder confidence in the SMP. A more cautious and evidence-based approach, including the option of not quantifying tourism impacts where evidence is weak, is entirely appropriate and would better reflect the current state of knowledge.

Similar to the SEA, whilst there is no legislative requirement to publish a Post Adoption Statement for the updated SMP's SEIA, we recommend this should be undertaken to address outstanding concerns regarding fisheries and tourism impact assessment methodologies (including with respect to displacement assumptions and cumulative impacts). SR remains committed to working with the Scottish Government and other stakeholders to ensure the final SEIA is robust, balanced and transparent. Our members would welcome the opportunity to engage and review further if additional evidence is published and reviewed.

#### **17. Do you have any comments on the Nature Conservation Marine Protected Area Assessment?**

Please ensure you have read the [Nature Conservation Marine Protected Area Assessment report](#).

In response to the Nature Conservation Marine Protected Area (MPA) Assessment, SR members highlight the need for clarity in the assessment methodology and how conclusions were reached, in addition to how cumulative effects and proposed mitigation will be managed.

The final SMP must provide greater transparency around interaction with conservation objectives and the implications for consenting. Some of our members have expressed concerns with the apparent high-level assessment methodology and conclusions drawn. These relate specifically to the way in which a project's Option Area is used to estimate impact on benthic features, resulting in a very precautionary interpretation of impact. Benthic impact cannot be assessed in the same way as impact on fisheries and an accurate project footprint would demonstrate an insignificant impact, removing the need for further precautionary compensation.

Our members also recommend closer alignment with strategic compensation principles and nature recovery objectives, supported by robust marine evidence. Efforts to address strategic compensation in Scotland, such as the Marine Recovery Fund, should be extended to compensation for MPAs, especially whilst these policies and legislation are currently being developed.

SR members acknowledge that grid connection infrastructure for ScotWind and INTOG projects is not considered within the Draft Updated SMP and associated assessments, as this is presently being assessed separately by NESO. The final SMP and associated Post Adoption Statements should take account of NESO's expected consultation on Offshore Co-ordination Strategic Assessments to demonstrate that potential locational and cumulative impacts are acceptable in

planning and environmental terms, including with respect to the required routing of some export cables from offshore wind farms through Marine Conservation Protected Areas.

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

Please ensure you have read the [Sustainability Appraisal report](#).

We are concerned that the SMP Sustainability Appraisal (SA) Report merely collates assessment findings and does not then draw any final conclusions as to impact level or acceptability for each Plan Option, region, or nationally. We strongly consider that the final SMP and associated Sustainability Appraisal Post Adoption Statement should be bolder.

SR members agree that the SA report must do more than collate evidence; it should draw conclusions on the acceptability of environmental, social, and economic impacts. A conclusion and recommendations section should be added to the updated SMP to provide strategic clarity and confidence. The SA should be extended to serve as a holistic evidence base that justifies key policy judgements and supports implementation.

**19. Do you have any comments on the Regional Locational Guidance?**

Please ensure you have read the [Regional Locational Guidance](#).

The Regional Locational Guidance (RLG) is a useful reference welcomed by SR members; however, it must be integrated with refined project boundaries and realistic deployment assumptions. It should not duplicate project-level assessments but rather support proportionate and consistent regional decision-making. Our members suggest that updated mapping and clearer articulation of planning confidence within each region would improve usability.

**END**