



Charlotte Johnston
Marine Sites and Strategy Team Leader
Joint Nature Conservation Committee
Monkstone House, City Road
Peterborough PE1 1JY

14th March 2008

Dear Charlotte

2007 Consultation on the Selection of Special Areas of Conservation in UK Offshore Waters

BWEA and Scottish Renewables wish to make a joint response to this consultation on the selection of Special Areas of Conservation (SACs) in UK offshore waters and we welcome the opportunity to respond.

Scottish Renewables is Scotland's leading renewables trade body, representing over 220 organisations involved in renewable energy in Scotland. Representing over 370 corporate members, BWEA is the UK's leading representative for the wind, wave and tidal energy industry. Further information on the work and membership of our organisations can be found on our websites (www.scottishrenewables.com, www.bwea.com)

Introduction

The EU targets for renewable energy 2020 are in the process of being developed, but could present a UK target of 15% of all energy to come from renewable sources. Due to the limited ability of transport and heat to deliver on this target, renewable electricity will be expected to provide a greater proportion and allow the Government to meet its binding targets. The percentage of renewable electricity could be between 35 - 45% of total demand.

The Government announcement of a Strategic Environment Assessment for offshore wind and oil and gas includes an objective for 33 GW of offshore wind by 2020. A programme of this size will be required to allow the government to deliver on its target as offshore wind is the technology best placed to make the lead contribution in this timeframe.

The possibility that offshore wind could make a significant contribution to this target and the fight against climate change will depend a great deal on all marine stakeholders taking a positive stance in their view of offshore wind and developing innovative initiatives that will enable all parties to work together and deliver on these goals.

Wave and tidal technologies are developing and the first signs of deployment are now being seen. This is just the beginning, however and the long term contribution to the fight against climate change by these technologies will be substantial. The ability to fulfil this potential will depend on an enabling attitude regarding environmental issues.

Offshore wind, wave and tidal also all add to the UK's security of energy supply by harvesting an indigenous UK resource and so reducing the UK's reliance on imported fuels.

Scottish Renewables and BWEA hope to work as closely as possible with all environmental stakeholders to deliver projects that both deliver large quantities of energy and minimise their impact on sensitive conservation features of the marine environment.

Our response will focus on:

- General comments on designation
- Sites and their associated boundaries
- The impact assessment, with reference to the designation of North Norfolk Banks and Saturn Reef

We hope that you find our comments to be constructive.

We have seen the response made by the Crown Estate to this consultation and we also support the arguments they have put forward relevant to renewable energy.

General comments on designation

There are processes underway both UK wide and in Scotland on the spatial management of the marine environment. We feel that this presents an opportunity to fulfil both conservation and renewable energy delivery aims. The offshore renewable energy industry recognises the great importance of conserving and enhancing the UK's natural heritage and is committed to continuous dialogue to resolve any issues. We believe that needs of both sectors can be met by a clear evidence based approach and the intelligent application of mitigation methods.

The greatest fear of the industry is that areas of the seabed are sterilised to development unnecessarily. In order to enhance climate change mitigation and security of supply, the dual use of areas for both conservation and renewable energy generation should be explored in every possible situation. Where uncertainty in the nature of the impacts is found then the precautionary principle should be exercised proportionally and with understanding of the contribution renewable energy can make to climate change mitigation. If impacts are discovered mitigation should be considered.

There is also a need to give clear and consistent messages to industry on what conservation and site designation means in practice. Uncertainty in whether a project will receive consent or whether the cost of surveying and monitoring will increase greatly can cause a project to fail, as a developer no longer considers it worthwhile to make the initial expenditure with no clear understanding of the return. Uncertainty can be reduced by increasing the data available or by clarifying the decision process as much as possible. While obviously assessing natural resources and understanding impacts is a complex task, any increase in clarity is beneficial.

It is fundamental that the need to mitigate climate change is considered when deciding to designate an area. This consultation has generally been optimistic in estimating the impact of climate change on the very features that it tries to protect. The true cost could be grave and the longer we take to move to a low-carbon economy the greater the impacts will be. Ocean currents, bird migration paths and whole ecosystems will undoubtedly be disrupted by even a relatively small increase in global temperatures. The urgency of this issue should not be underestimated.

A general concern is raised by the fact that the future management of activities in the SAC and the consenting of any projects will be considered after the designation of the area. It is important to understand how the outcomes of consultation regarding socio-economic issues will be appraised and integrated into the decision to designate.

Sites and their associated boundaries

A designation is not expected to be revised for 10 years. There should be a mechanism in place whereby the status of the designation is reviewed as more data is gathered.

Associated Impact Assessments, with reference to the designation of North Norfolk Banks and Saturn Reef

North Norfolk Sands and Saturn Reef (NNS&SR) has the ability to mitigate climate change through the construction of offshore wind farms. In the consultation documents you estimate that NNS&SR could hold 2000 MW of offshore wind farms, this equates to the displacement of between 2.27 (displacing gas) and 5.27 (displacing coal) million tonnes of CO₂ per year. This is a considerable benefit to the fight against climate change and should be considered as a benefit that could be provided by this site. The designation of this site would hamper the ability to deliver this carbon reduction.

We believe that the impact on costs for offshore wind in NNS&SR is underestimated. £500,000 does not seem a large amount for the performance of environmental surveys. An Environmental Impact Assessment performed in an SAC could involve a considerably large amount of work. There are also indirect impacts on delays to consent, which will involve further cost. The increase in costs in addition to the increases of uncertainty in consent could cause projects to become no longer financially viable.

Our comments are intended to be constructive and we hope that they have been useful.

Yours Sincerely,

Handwritten signature of Duncan Ayling in black ink.

Duncan Ayling
Head of Offshore Renewables
BWEA

Handwritten signature of Morna Cannon in black ink.

Morna Cannon
Development Officer
(Marine and Bioenergy)
Scottish Renewables