

By email FAO: MMO Marine Planning Team

30 April 2020

**RE: MMO Draft North East, North West, South East and South West Marine Plans Consultation**

Energy UK welcomes the opportunity to respond to the MMO's Draft Marine Plans Consultation. To support our online submission, the following letter sets out some key high-level points from the energy industry and captures items not covered by the set questions.

**About Energy UK**

Energy UK is the trade association for the energy industry with over 100 members spanning every aspect of the energy sector – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership.

We represent the diverse nature of the UK's energy industry with our members delivering almost all (90%) of both the UK's power generation and energy supply for over 27 million UK homes as well as businesses.

The energy industry invests over £13.1bn annually, delivers around £85.6bn in economic activity through its supply chain and interaction with other sectors, and supports over 764,000 jobs in every corner of the country.

**Ensuring sustainable development**

Together, marine industries have a key role and responsibility in protecting the marine environment and promoting sustainable development. A key part of this future is, and will be, the deployment of large volumes of low-carbon power necessary for economy-wide decarbonisation.

The UK is committed to meeting net zero by 2050 and plans for rapid decarbonisation are expected to be outlined in the forthcoming 6th Carbon Budget. As we transform our energy system on the road to net zero delivery, there is an opportunity for marine industries to together realise this ambition.

The rate of change required to succeed, however, requires the support of an effective set of Marine Plans which promote co-existence of sea users and facilitates the deployment of large-scale, low cost clean power.

The UK is the global leader in offshore wind with more capacity installed than any other country. In the years ahead it will become the backbone of the UK's clean, affordable, modern energy system. With UK Government commitment to deploy 40GW by 2030 (up from 30GW as outlined in the Offshore Wind Sector Deal) and advice from the Committee on Climate Change to reach 75GW by 2050 to achieve net zero, it will be critical for the Marine Plans to support the pipeline of offshore wind and indeed floating offshore wind, now and throughout the coming years.

**Realising the opportunities**

As we move towards net zero, industry is concerned that rather than helping facilitate deployment, the Marine Plans could create policy challenges for offshore wind. To deliver on UK decarbonisation targets whilst simultaneously ensuring the sustainable development of our marine environment, the following topics require further consideration:

- **Marine Policy Statement** – the Draft Marine Plans make reference to the 2011 Marine Policy Statement, however, given both the changing marine environment and UK Government emphasis to achieve legally binding net zero targets, industry would welcome review of the

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statement to reflect these changes. Industry would also welcome the opportunity to further discuss how a strategic level approach to marine spatial planning and the Habitats Directive derogation process could be adopted across UK Government, the devolved administrations and industry to support achievement of these targets.

- **Terminology** – industry have some concerns regarding consistent use of terminology within many policies within all four of the Draft Plans for proposals to demonstrate “that they will, in order of preference:
  - a) Avoid
  - b) Minimise
  - c) Mitigate adverse impacts.”

If all policies are applied consistently on such a basis it is difficult to see how sustainable development of offshore renewables, or other activities, can be achieved. Instead, we believe marine planning should be used as a basis to assess the potential positive and negative impacts of proposals across receptors and reach a balanced decision based on this assessment as to whether a proposal should be supported or not.

- **Timely delivery of projects** – from planning to operation, delivery of renewable energy projects will need to be timely and efficient. Without shortening the typical project timeline, at present, there is significant risk to achieving offshore wind and net zero targets.
- **Future-proofing** – in addition to draft marine plans enabling the maximisation of current wind power projects, it will be important for plans to enable future potential from floating offshore wind, in line with the UK Government’s commitment.
- **Evidence** – although there is a lack of baseline data for many aspects of the marine environment, over-precaution or the assumption that data-rich areas have a greater number of environmental issues (because comparatively they are well documented), should not prevent achievement of UK decarbonisation targets.
- **Leasing** – industry would welcome clarification on how the Marine Plans will work alongside The Crown Estate’s leasing process.
- **Effective co-location** – in order to help promote sustainable development and ensure that all marine industries are recognised in the Marine Plans, stakeholders will need to be consulted further. Successful implementation of the Marine Plans will require effective integration of different interests within the marine environment – something which could be supported by an impact assessment of all maritime industries to ascertain which industries should be prioritised in terms of contributing most to meeting UK net zero targets.
- **Defence** – industry would welcome further discussion with the MMO on how to effectively capture a collaborative approach between key stakeholders relating to offshore wind and defence operations - learning from the work that has existed to date through the BEIS-led Aviation Management Board (for wind and aviation including defence matters), and the current joint programme between MOD, BEIS and the Offshore Wind Industry Council (OWIC) regarding Air Defence matters as a workstream of the Offshore Wind Sector Deal.
- **Implementation** – application of the Marine Plans in practice will require further discussion. Industry would welcome an invitation to participate in these discussions alongside other key stakeholders.
- **Net Gain** – as a developing concept which is not mandatory in a marine context, further thinking is required on how net gain can be delivered in this complex environment. Reference should

therefore not be made to net gain in the Marine Plans, where not supported by existing policy. Energy UK and RenewableUK have held several constructive workshops with Natural England on the potential application of net gain in the marine environment and would welcome the MMO's participation at future workshops to progress thinking further.

- **Net Zero** - we would like to see favourable support for projects using the marine environment that will serve to mitigate climate change, for example renewables, CCUS and nuclear power generation. Providing reliable, firm low-carbon power, nuclear power needs to be recognised within the Marine Plans, in order to reflect the Overarching National Policy Statement for Energy (EN-1) and the UK's binding commitment to net zero emissions by 2050.

In addition to discussions on implementation, industry would welcome further discussion with the MMO given the challenges we faced trying to engage with the online consultation process. Whilst we greatly appreciated the extensions we were granted, we have found this a particularly resource-intensive consultation, particularly given the fact that four draft Marine Plans were being consulted on simultaneously and there was difficulty in sharing offline responses in order to agree a joint response between our members. Industry would also welcome the opportunity to discuss the Draft Plans in greater detail, to gain a better understanding of where policies are either consistent or different across the plans and to ensure that, in co-existence with other key marine industries, the UK can deliver on its decarbonisation goals.

Yours sincerely,

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