

SR/SOWEC Barriers to Deployment
Risk 4: National Marine Plan 2 (NMP2)

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Marine Directorate
Scottish Government
Area 1B North, Victoria Quay
Edinburgh, EH6 6QQ

Dear Louise O'Hara Murray,

**Response to: Scottish Government consultation on the National Marine Plan 2 (NMP2)
Planning Position Statement (PPS) (November 05, 2024)**

Scottish Renewables 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 350 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 (SR) welcomes the opportunity to provide our view on the Scottish Government's (SG) consultation on the National Marine Plan 2 (NMP2) Planning Position Statement (PPS).

In response to this consultation, our members have highlighted the following key points, which are covered in further detail below:

- Strongly welcome the positive and detailed engagement between the SG NMP2 team and the offshore wind sector throughout 2024. Scottish Renewables and our members stand ready to engage further with the NMP2 team throughout 2025 to support the timely and effective publication of Draft NMP2 before the end of this year.
- Strongly welcome the inclusion of many of the sector's priorities and key asks, as shared through previous engagement, directly within the NMP2 PPS. This limits the need to provide detailed commentary at this stage, although we have outlined some further details and proposals to assist the policy development process and help accelerate the development and delivery of the

full draft NMP2.

- Whilst it is important that all of the sector's key asks for NMP2 are fully considered and addressed, the following are some of the most important points for consideration at this stage in developing the full Draft NMP2. It is vital that the draft plan provides:
 - A clear statement articulating the urgency of tackling the climate emergency, affording significant weight to addressing climate change in decision-making and establishing this as the starting point for all decisions. Projects should seek to maximise the decarbonisation potential of Scotland's marine region.
 - NMP2 should clarify which technologies/seabed users have order of priority in addressing climate change in the event of spatial conflict (e.g., between offshore wind and Carbon Capture, Usage, and Storage (CCUS) projects).
 - Support biodiversity protection and enhancement with clear policy and criteria. Secure nature positive outcomes through both strategic compensation and biodiversity enhancement focused on nature based solutions, nature-inclusive design, ecosystem resilience, and place-based approaches.
 - A holistic approach, i.e. Scottish and UK Marine Recovery Funds to fund both strategic compensation and biodiversity enhancement and a joined-up approach across UK authorities.
 - Clear criteria and expectations for renewable developments, with additional guidance providing further information and clarifying uncertainties, expanding on key terms and/or tests, and aiding in implementation.
 - Coordinated policies with linkages to wider regional and national policies/targets to create coherent and workable policies. Additionally, support sectoral and regional plans and coordinate NMP2 with any forthcoming plans to enable proportionate consenting.
 - Alignment across all UK plans, including but not limited to the National Energy System Operator's (NESO) Clean Power 2030 Action Plan, NESO's Strategic Spatial Energy Plan (SSEP) and The Crown Estate's (TCE) Whole of Seabed approach or Crown Estate Scotland (CES) equivalent.
 - Clear prioritisation for the deployment of renewable energy infrastructure and alignment with the UK's Government's critical national priority policy for renewable and low carbon energy infrastructure, as set out within the UK National Policy Statements (NPS) for Energy Infrastructure.
 - Establish objective policy criteria to ensure Habitats Regulations Assessment (HRA) derogation tests relating to Imperative Reason of Overriding Public Interest (IROPI) & Alternatives Solutions are applied consistently and proportionately.

As SR members have previously articulated, similar to National Planning Framework 4 (NPF4) Policy 11 – Energy, it will be important for Draft NMP2 to set out a fully developed, clear and objective policy to act as the principle or anchor policy which applications for marine renewable energy developments should be assessed against. We suggest that NMP2 should include an equivalent marine renewable energy policy modelled on NPF4 Policy 11, amended and updated as necessary to reflect marine considerations and relevant issues. In particular, this policy should provide explicit support for the deployment of offshore renewable energy projects together with a clear and proportionate set of assessment criteria. Other NMP2 policies will also be relevant in terms of assigning weight to specific impacts and benefits.

Our members recommend that a marine renewable energy policy within NMP2 should include:

- Explicit policy statement recognising the urgent need to deploy marine renewable energy projects to respond to the climate emergency and deliver a range of wider benefits. Therefore explicit strong policy support for the deployment of marine renewable energy in appropriate locations.
- A statement establishing the principle of offshore wind development within related plan options, which have already been identified and assessed through regional and/or sectoral plans as appropriate. We note and welcome that the updated Sectoral Marine Plan (SMP) for Offshore Wind should now be finalised in Autumn 2025, meaning that its conclusions should be taken into account within the preparation of Draft NMP2. This would help to avoid duplication and ensure that project-level consenting is proportionate.
- Robust application of the mitigation hierarchy, with residual effects generally considered acceptable where appropriate design mitigation has been applied and demonstrated. In respect of any residual significant seascape, landscape or visual effects, these are likely to be accepted if the social, economic or environmental benefits of the proposal outweigh the predicted impact.
- Development proposals should demonstrate how they contribute to the delivery of a Just Transition, including consideration of relevant socio-economic and supply chain impacts.

We urge the Scottish Government to now move to quickly narrow and further develop a more coherent view on the suite of policy positions they intend to take forward into Draft NMP2 and to present these at the earliest opportunity through both engagement with Scottish Renewables, the NMP2 steering group and website publication.

It is trusted that the concerns and matters of our members raised below will be fully considered. Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,



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RESPONSE TO CONSULTATION QUESTIONS:

High-level objectives

Development of draft National Marine Plan 2 (NMP2) high-level objectives (HLOs) has been informed by the legal requirements set out in the Marine Acts and other existing legislation and strategies (detailed in Section 3 of the Planning Position Statement (PPS) [consultation paper](#)).

Please read Section 4 High Level Objectives in the PPS [consultation paper](#) before answering the following question(s).

1. Do you agree with the updated wording for the high-level objectives (HLOs) and the focus they set out for policies in the National Marine Plan 2 (NMP2)? Please state which high-level objectives (HLOs) you are referring to in your response.

Yes, mostly agree. However, the proposed climate High-Level Objective (HLO) *‘Mitigate and adapt to the impacts of climate change in Scotland’s seas’* needs to be clarified and strengthened to be more action-orientated and frame Scottish Seas as providing opportunities.

SR members strongly support the inclusion of climate change mitigation and adaptation as a HLO for the National Marine Plan 2 (NMP2). As an effective policy response to the climate emergency, it is crucial for addressing the climate crisis and successfully achieving statutory emissions reduction targets. Our members also fully support the move away from environmental trade-offs, which are inappropriate in respect of developments such as renewable energy which directly seek to deliver both environmental and economic benefits to Scotland.

However, as drafted, the climate HLO does not convey the urgency or scale of required climate action. Greater clarity and emphasis are needed to ensure that climate considerations are appropriately and consistently prioritised across all relevant decision-making. Clarity is required on how actions to support climate change mitigation will be prioritised in the event of a spatial conflict between technologies (e.g., offshore wind and oil and gas) and how low carbon technologies will be balanced with nature marine protected areas and/or areas for restoration. Therefore, SR considers a bolder statement within the HLO confirming Scotland’s position on taking climate action, and the important role of the marine environment in doing so is therefore essential.

Our members support the use of “significant weight” being given to addressing climate change as referenced in the National Planning Framework 4 (NPF4) and do not recommend moving away from this approach in climate policies within NMP2. An equivalent NMP2 policy should more precisely indicate that significant weight is to be applied as the starting point for all relevant decisions, setting out the intention to maximise the decarbonisation potential of Scottish marine areas.

SR’s suggested climate HLO is as follows: *Address the climate change crisis through action, with Scotland’s seas playing a fundamental role in delivering climate change mitigation and adaptation solutions.*

Our members support the clear wording of the Nature HLO wording. Whilst we recognise the desire to limit references to other plans and strategies to aid durability, we support linkages to important long-term national plans, including the Scottish Biodiversity Strategy (SBS) and NPF4, to ensure coherence across planning areas. We agree that clarity is needed regarding the baseline against

which this objective would be measured, but NMP2 should avoid focusing overly on baseline assessment and quantitative measurement/monitoring of actions at the expense of enabling investment in biodiversity enhancement measures in tandem with development projects. The priority should be to **a)** ensure that suitable biodiversity protection and enhancement is delivered without delay rather than focusing on measurement or evidential requirements before introducing a policy approach to deliver biodiversity enhancements through consenting and licensing, and **b)** ensure ecosystem functionality and resilience rather than very specific measures. The Nature HLO should ensure a joined-up approach across regulations, e.g., to support both Marine Net Gain (MNG), strategic compensation, and other similar requirements.

Our members support the Sustainable Marine Economy HLO and encourage alignment with existing policies/frameworks, such as the Scottish Government's Programme for Government and sector-specific strategies and targets, such as the National Strategy for Economy Transformation and forthcoming Energy Strategy and Just Transition Plan. In addition, any criteria used to define what constitutes sustainable development should reflect the climate emergency and Scottish Government policy and, as above, clarify the priority of marine users.

Our members support the Accessibility and Wellbeing HLO.

We strongly support the Implementation HLO and its wording. We agree that plan implementation is a very important factor to consider, and we believe greater consistency and transparency are fundamental to aiding successful plan implementation. To support the effective delivery of the proposed Implementation HLO, we suggest being more explicit regarding the need for NMP2 to align and coordinate with existing policy and guidance without having to necessarily name every policy. This would support the consistent application of NMP2 policies with reduced risks of challenges or confusion around contradicting expectations or policy interpretations. In addition, some NMP2 policies should be supported by guidance to clarify their expectations and interpretations, and this guidance should be prepared swiftly to avoid an implementation gap and policy uncertainty following the adoption of NMP2.

2. Please add any additional comments on the high-level objectives (HLOs) in the space provided below.

We support the choice of topics for HLOs, agree with reducing the number of HLOs, and believe that they should apply to all sectors and activities. Reducing the number of HLOs down to 5 helps create a strong, coherent vision for the plan and avoids duplication or incompatibility with existing plans.

The wording of the climate change objective could be stronger, linking back to government targets of net-zero by 2045.

The objective of transparent decision-making would be supported by NMP2 providing a clear direction on priorities. Therefore, we suggest that in order to address competing interests and aid in implementation, there must be prioritisation mechanisms such as a policy hierarchy prioritising climate and nature as a consideration.

Climate change mitigation and adaptation

National Marine Plan 2 (NMP2) will include dedicated policy(ies) on climate change mitigation and adaptation, setting out specific implementation criteria to guide decision-makers.

Please read Section 5.1 Climate Change Mitigation and Adaptation in the Planning Position Statement (PPS) [consultation paper](#) before answering the following question(s).

3. What are your views on the policy ideas proposed under the 'Climate Change Mitigation and Adaptation' section?

We support the intention to include dedicated policies on climate change mitigation and adaptation within NMP2, including specific implementation criteria to guide decision-makers with clear expectations, ensuring consistency in approach.

Our members agree that for the Scottish Government to respond effectively to the climate emergency, **NMP2 should frame tackling climate change as a golden thread throughout the plan and a key policy topic that garners significant weight in all decision-making.** This should include setting out a policy requirement to consider climate impacts and issues as the starting consideration for all relevant decisions to be made in accordance with the plan, with significant weight afforded to positive contributions towards emissions reduction and adaptation. This would provide a necessary and effective link to NPF4 Policy 1 – Tackling the Climate and Nature Crises, aligning these policies and including prioritisation.

Further, our members highlight the need for the prioritisation of the deployment of offshore wind at a pace in line with the emerging Energy Strategy and Just Transition Plan and wider targets. Offshore renewables, particularly with the ScotWind leasing round, have grown substantially since NMP1, and their role in tackling climate change should be considered.

Our members propose that NMP2 includes a central test or policy position for all proposals to maximise the decarbonisation potential of Scotland's marine area. Further, we support increased consistency, objectivity, and clarity across all environmental acceptability tests, including cumulative impacts. This is recommended in the form of additional guidance to the policy. Therefore, we support the suggestion of providing sector-specific guidance to ensure proportionate expectations for the consideration of environmental issues.

Regarding the consideration of likely significant impacts, it will be important for NMP2 to provide more proportionate and consistent environmental policies based on the acceptability of residual significant impacts and targeted opportunities for enhancement. The acceptability of any adverse environmental impacts, including some landscape and visual effects which can generally be expected from renewable energy developments owing to their scale and characteristics, should be judged in the context of the need to respond urgently and effectively to climate change. Impact acceptability should, therefore, be assessed in the context of the predicted scale of a positive contribution towards emissions reduction rather than these factors being considered separately.

Our members broadly agree on the proposal on lifecycle greenhouse gas (GHG) emissions and that projects should be required to demonstrate steps to reduce lifecycle GHG emissions. However, the early design stage of projects and limited supply chain certainty during the consenting phase prior to Contract for Difference and Final Investment Decision limits the ability to make detailed sustainability commitments within consenting applications. It would be appropriate for NMP2 to require options and appraisals of design features and alternatives with a commitment to developing post consent sustainability plans informing supply chain decisions. However, it would not be feasible to mandate commitments to specific sustainability measures, e.g. low-GHG materials or use of particular suppliers or manufacturing facilities, in the consenting phase.

We are concerned that NMP2 could inadvertently become a barrier to deployment for offshore wind if the policy “required” steps for reduced GHG emissions to be demonstrated. Instead, it should be a consideration that only needs to be supported by qualitative information. Our members would not support a requirement to, for example, quantify lifetime CO₂ equivalent emissions of a project, as methodologies are still in the very early stages of being tested and due to the design/supply chain being unknown at the consenting stage, as already stated. The fact that offshore wind contributes to reduced GHG emissions should also be recognised. Our members highlight that, as written, the current policy on reducing lifetime GHG emissions within NPF4 has led to some confusion in expectations and implementation and, therefore, should be strengthened and clarified if included in NMP2. In addition, we propose that should NMP2 require carbon calculations, the use of consistent industry standardised methodologies should be promoted.

Our members recommend that the Scottish Government takes a proactive role in shaping the Strategic Spatial Energy Plan (SSEP) by adopting a vision-led approach for 2045 rather than only inputting existing sites and 2030 targets into this new plan, which would add little value to planning and consenting processes. To enable this, it is recommended that new vision-based offshore wind targets be set at the earliest opportunity, such as the next Scottish Government Climate Change Plan in Spring 2025, and for these targets to be based on the volume of offshore wind generation capacity needed to achieve net-zero emissions rather than being based on assessments of capacity and cumulative from only the current pipeline of known projects. It is essential that the Scottish Government align NMP2 with other spatial plans, both offshore and onshore, local, regional and national such as but not limited to NESO's SSEP, TCE's Whole of Seabed approach or Crown Estate Scotland (CES) equivalent, The Marine Manager Organisation's (MMO) Marine Plans and Local Authority Plans.

We support the point that implementation criteria will relate directly to such policies, covering topics such as emissions reduction, shoreline adaptation, planning for nature, and nature enhancement, amongst other topics. We support introducing a level of prioritisation into decision-making under NMP2, perhaps in the form of a policy hierarchy. The term “significant weight” does not go far enough, and our members suggest projects which directly address climate change should be prioritised and within this projects should be further prioritised, e.g., if there's a conflict between different low-carbon technologies. This should include critical national infrastructure and NMP2 should align with the Energy NPSs by also including a definition for Critical National Priority (CNP) infrastructure. On the siting of projects, where sectors are subject to sectoral marine planning, there should not be the need to revisit siting at the project level, our members agree that where there

has not been separate sectoral planning, this is important.

In summary, while our members strongly support the NMP2 Planning Position Statement's elevation of climate change to HLO status, **we encourage the Scottish Government to embed climate change throughout the plan, with significant weight being given to tackling the climate emergency as a starting consideration for all decisions and addressing the climate crisis as a key priority.**

To aid the policy development process, our members have highlighted some key points to include in a climate policy:

- Significant weight will be afforded to tackling climate change, and this will be the starting consideration for all decision-makers.
- Maximising the decarbonisation of Scottish seas should be prioritised. Conflicts between marine users that cannot be resolved should be determined by prioritising proposals that contribute the greatest to decarbonising Scotland's marine environment.
- Significant weight should be afforded to projects that provide positive contributions to emissions reduction targets and adaptation. This should be considered when judging the acceptability of any adverse impacts.
- Siting and designing of developments should minimise GHG emissions where feasible and consider how best to adapt to both current and future climate change risks.

Nature

Policy ideas for ecosystem health, protection and restoration, and enhancement include suggestions to consider National Planning Framework 4 (NPF4) Policy 3 on:

- *nature positive developments and nature-inclusive design*
- *policy on enabling space for nature (including restoration, recovery and enhancement)*
- *priority habitats and priority marine features (PMFs)*

Please read Section 5.2 Nature in the Planning Position Statement (PPS) [consultation paper](#) before answering the following question(s).

4. What are your views on the policy ideas proposed under the 'Nature' section of the Planning Position Statement (PPS)?

Our members support policy which encourages positive measures for nature and recommend that offshore wind developments which directly tackle climate change should be recognised as already having a positive impact on nature. Clearly defined terminology and specific complementary guidance for marine enhancement and nature restoration are welcomed. While our members agree with most of the key feedback points provided, Section 5.2.2 does not provide a clear policy proposal for NMP2 nature policies and largely discusses other workstreams. The PPS refers to a requirement for "nature positive use" and for developments to be "nature-inclusive". It is recommended that the Scottish Government define these terms and clarify how they interact with other regulations, e.g., strategic compensation and Marine Net Gain.

Regarding biodiversity enhancements and nature-inclusive design (NID), we support aligning the NMP2 position with NPF4 Policy 3 – Biodiversity whilst ensuring that requirements to provide biodiversity enhancement as part of consenting applications are workable, clear, proportionate and applied consistently. Given practical challenges and the current limited evidence regarding the efficacy of nature recovery and enhancement measures within the marine environment, we would advise that any policy requirement for proposals to deliver marine biodiversity/nature enhancement should avoid focusing on impact significance. This is because it may be difficult to assess and should instead adopt a flexible place-based approach, including allowing the use of nature-inclusive design (NID) where appropriate. This should build on the outputs of the award-winning [Collaboration for Environmental Mitigation and Nature-Inclusive Design \(CEMNID\) project](#) which provides clear definitions and evidence for how nature-inclusive design principles and measures can be embedded within Scottish offshore wind projects. Additionally, we support setting up expectations for developments to be nature-inclusive and a test that requires applicants to demonstrate consideration of NID and, where appropriate, to incorporate NID solutions. However, any policy must recognise that NID is not a silver bullet nor applicable in all situations so it would not be appropriate to mandate for all developments. For nature-inclusive design, clear guidance and a set of principles are required, which could be sector-specific. It is recommended that all industries should be included. Our members have highlighted [Witteveen Bos \(Dutch\) guidance on Nature-inclusive designs for offshore wind farms](#) and [Nordic Energy Research on Coexistence and nature-inclusive design in Nordic offshore wind farms](#) as helpful examples.

Regarding Nature Positive Use and Development, we welcome and support the proposed wording. Nature positive developments and their expectations should be clarified with a clear scope and definition and explain how development proposals should demonstrate contribution towards nature positive targets set at a plan level for which measures are implemented strategically through The Scottish Marine Environmental Enhancement Fund (SMEEF) or similar mechanism. Further, it would be useful to clarify that a single development cannot itself be nature positive following the definition provided in Question 5. The definition should be objective and outcome-based to facilitate a clearly understood, flexible, and proportionate approach to enhancement which takes account of site-specific constraints and opportunities. This could come as guidance alongside the policies. Any nature positive policy should be strategic, sufficiently flexible, support ecosystem functionality and resilience, facilitate a joined-up approach across regulations and utilise a place-based approach in order to take account of site and development specific circumstances rather than requiring rigid adherence to specific measures or quantitative requirements. Specifically, our members support securing nature positive outcomes through both strategic compensation and biodiversity enhancement focused on nature networks, nature-based solutions, ecosystem resilience and place-based approaches. Details should be provided to aid in the interpretation and application of strategic compensation.

Our members highlight that the Nature Policy section does not yet cover some of the key issues which we would like to see addressed in the final NMP2, in particular regarding expectations for any derogations required under the Habitats Regulations or Marine Acts. We support the current approach with considerations associated with impact assessments covered in subsequent sections but recommend reference to the points below is also made in the Nature Policy section.

In relation to derogations, it is clear that NMP1 is outdated, and updates are needed for offshore wind applications to clarify expectations and ensure consistency of approach across both consultee

responses and ministerial decision-making. Our members support the development of clear policy requirements or complimentary guidance and compensation mechanisms, which can be applied proportionately and consistently. In addition, we support setting principles for Habitats Regulation Appraisal (HRA) derogation decision-making to confirm how the adequacy and acceptability of Imperative Reason of Overriding Public Interest (IROPI), alternatives, and compensation will be judged. Further, our members suggest aligning with the flow charts in the UK's National Policy Statements (NPS), which fast track the IROPI and Alternatives cases.

We note that it may be challenging to have policies specifically on Priority Marine Features (PMFs) as these are so widespread and diverse. For nature positive measures to be most effectively delivered – this should be done strategically through bodies such as The Scottish Marine Environmental Enhancement Fund (SMEEF). Our members recommend this should be coordinated with compensation and any development of the UK and Scottish Marine Recover Funds (MRF), respectively.

Our members support including the following points within a draft biodiversity policy option:

- Development proposals should preserve, restore, and enhance biodiversity while maximising positive opportunities for nature.
- Strategic compensation and biodiversity enhancement should be utilised to achieve nature positive outcomes. Any compensation, mitigation, or enhancement should be proportionate to the development proposal.
- The climate and nature crises should be understood as twin crises that must be tackled together.
- Planning and design of developments should be used to minimise adverse impacts on biodiversity and the marine environment.
- For derogations, the need to tackle the climate emergency should be considered a reason for IROPI for HRAs. Other projects in different locations and potential reductions in the scale of a proposal, resulting in reduced renewable energy output, should not be considered as alternative solutions for the purposes of project-level consenting.

5. Considering the definition of 'Nature Positive' below, what are your views on how this could be implemented by different sectors, types of development and use?

Definition of 'Nature Positive' in the Scottish Biodiversity Strategy (SBS):

"Reversing the downward curve of biodiversity loss so that levels of biodiversity are once again increasing, bending the curve of biodiversity loss."

We strongly support the alignment of any nature positive definition or policy within NMP2 with the Scottish Biodiversity Strategy (SBS), as this will help create consistent and coordinated policies. We note that the SBS was finalised during this consultation period and encourage this to be appropriately included in the development of the full Draft NMP2.

Based on an evidence-based spatial plan of conservation and restoration priorities and associated targets, our members agree that this would be most effectively implemented by being managed and delivered at a strategic level through bodies such as SMEEF. This would provide the overall best outcome for nature as this could more easily be monitored and adapted. An alternative would require sector-specific guidance on how to achieve nature positive outcomes.

For the offshore wind sector, we encourage utilising the outputs from the CEMNID project, supported by Scottish Renewables, in collaboration with SR members and stakeholders, and published by the Scottish Offshore Wind Energy Council (SOWEC). This project is of high relevance to implementing nature positive developments, nature-inclusive design, and strong environmental mitigation within the offshore wind sector. CEMNID has produced a new useful set of tools for the sector including a 'Good Practice Mitigation Library' and a suitability review of NID measures. These offer a practical framework for the offshore wind sector to deliver projects with minimal impact and to benefit the marine environment, going above and beyond existing mitigations to maximise opportunities for nature while developing green infrastructure projects.

Sustainable marine economy

Several policy ideas for National Marine Plan 2 (NMP2) were identified from available feedback and tested with sector representatives.

Please read sections:

- [5.3 Sustainable Marine Economy – Cross-sectoral Policies](#)
- [5.4 Sustainable Marine Economy – Sector Policies](#)
- [5.5 Sustainable Marine Economy – Management of Pressures](#)

in the Planning Position Statement (PPS) [consultation paper](#) before answering the following question(s).

6. What are your views on both the cross-sector, and sector-specific policy ideas proposed under the 'Sustainable Marine Economy' section?

Cross-sector:

We support the proposal to facilitate engagement and encourage NMP2 to define specific coexistence policies with policy mechanisms and tests that will enable delivery. NMP1 uses weak language and encourages proposals which enable coexistence “where possible” rather than defining this, assigning priorities, allocating responsibilities, or providing any mechanisms to help achieve sectoral coexistence. When considering how proposed developments can support coexistence, our members request strong and objective criteria to enable consistent decision-making where potential stakeholder conflicts arise – including a clearly structured test to determine whether a project’s acceptability supports or hinders coexistence. As noted above, the policy should prioritise technologies to assist decision-makers if and when conflicts arise. Our members recommend that the Scottish Government publish and communicate a clear roadmap for coexistence, which specifies which licences/leases have priority, when, and why.

There has been a significant increase in the number of users of marine areas in different sectors since NMP1, creating more potential for conflict, which may hinder successful coexistence, and the proposal to support projects that avoid areas for coexistence purposes is increasingly less achievable with growing marine use through renewable energy. Therefore, frameworks and expectations for engagement could help in the form of additional guidance. Further, it would be helpful to include a test within NMP2 requiring that in the event of a spatial conflict between marine uses or proposals which cannot be resolved through coexistence, Scottish Ministers will prioritise

proposals and uses which make the greatest contribution to maximising the decarbonisation potential of Scotland's marine environment. Additionally, it is important to include a policy requiring that when there is spatial conflict and accompanying negotiations between stakeholders, any stakeholders engaging in co-existence negotiation should be expected to provide robust evidence for their claims. There needs to be a clear strategy of alignment in NMP2 to demonstrate how the policy is working towards the achievement of NESO's Clean Power 2030 Action Plan and net-zero targets beyond 2030 in Scotland and the UK.

Further, our members suggest that when mitigation measures are required to be provided to other users, NMP2 should include a provision stating that their needs should be robustly evidenced and negotiated by the applicant throughout the determination process rather than afterwards. For example, the principles and scope of mitigation expectations could be outlined upfront. This allows for the mitigation recipient to respond to the proposal and for the Scottish Ministers to make a fair judgement on acceptable mitigation measures while preventing the mitigation from being left undecided after a development has gained consent. These measures could streamline a key cause of delays in the post-consent phase.

NMP2 should provide renewed impetus and a strong framework to support the development of regional marine plans, and any coexistence policy should incorporate a regional plan framework for collaboration between marine users. This should include expectations of regular contact and meetings between those in the region, which are key to reducing sectoral tensions and enabling coexistence; further guidance can aid in this. Therefore, we support the proposal to integrate and coordinate policies together, such as cohesively aligning NMP2 with national, regional, and sectoral plans in a usable manner, specifically NESO's SSEP, TCE's Whole of Seabed approach or Crown Estate Scotland (CES) equivalent and Local Authority Plans as referenced above.

Our members highlight the need for support for further sectoral planning both for offshore renewables and other industries (including ports), acknowledging Scotland's net-zero targets informed by spatial data. We support clear policy on compensatory measures for Habitats Regulations Assessments (HRA) derogation and marine space being prioritised to deliver this (as referenced in our response to Question 4). Further, our members agree on the need to reduce the emphasis on coexistence/colocation as this can make decision-making more challenging and delay decisions and delivery of net-zero targets. This is the preferred solution in the long-term, as it would lead to efficient use of the seabed and deliver the best outcome for the environment and all industries. However, opportunities for further coordination could also be considered in future, for example, the provision of clean energy direct from offshore windfarms to oil and gas/CCUS infrastructure.

Our members have proposed the key points below to include in a coexistence policy which we would welcome in the full Draft NMP2:

- Any stated impacts on other users or activities from a development proposal or requests for mitigation provision should be evidenced robustly.
- If a development has been established in a specific location by leasing or consent and the principle of development has been established, then any coexistence engagement should treat this as a given.

- If conflict between marine users cannot be resolved by other means, then proposals that make the greatest contribution to the decarbonisation of Scotland's marine environment should be prioritised by the Scottish Ministers.
- Any proposal for mitigation should be proposed by the applicant upfront, and if it is justified, reasonable, and evidenced, then it should be considered acceptable.

Sector-specific:

Our members encourage the development of sector-specific policies when necessary to provide direction in the planning and consenting of different development types, with these grouped under relevant proposed HLOs.

Regarding sectoral planning, NMP2 needs to go beyond NMP1 in terms of linking to sectoral planning. While the role of NMP1 was largely to establish a sectoral planning regime, this has now matured. On November 28, 2024, the Scottish Government confirmed a revised programme for the completion of the Sectoral Marine Plan - Offshore Wind Iterative Plan Review (SMP-OW IPR), with the finalised draft plan expected by Autumn 2025 and adoption as soon as possible thereafter. This means that strategic assessments, including stakeholder engagement, for all ScotWind plan options will have been undertaken prior to the publication of Draft NMP2 in Winter 2025. This should then allow the Draft NMP2 to recognise the principle of development for and confer a degree of planning acceptability of offshore wind development within the leased plan options.

To avoid the need for consenting applications for every proposal within plan options covered by a SMP needing to rehearse the debate regarding whether the area is generally suitable for the proposed development type or activity, our members request that NMP2 should include a non-sector-specific policy which recognises the importance of and affords a policy status to Sectoral Marine Plans. It is recommended that such a policy states that where Plan Options have already been identified in SMPs for particular uses or activities, and this is supported by strategic-level assessments, including inclusive stakeholder engagement, then the principle of the relevant development type or use will be deemed to be established. This would mean that the principle of development within assessed Plan Options should not then need to be reconsidered in the licensing or consenting of individual projects each time.

Our members strongly believe that to add value to the consenting process, SMPs should guide proportionate project-level consenting by identifying the key issues which consenting applications and determinations should focus on whilst providing sufficient evidence to close out at plan level some more minor issues, which should then not require detailed reconsideration at the project level. To avoid duplication and unnecessary delays, assessments and applications at the project level should focus more on design issues, including the proposed scale, physical characteristics, operational arrangements and interactions with other marine users associated with individual proposals. This will allow for better streamlining and predictability. We disagree that identification of areas for prioritisation would need to be outside of sectoral planning and it is unclear why this limitation has been proposed, as a key role of sectoral planning is already to promote and prioritise certain development types and uses in appropriate locations.

Whilst sectoral coexistence remains important to reduce potential areas of spatial conflict and enable proportionate consenting, it is essential that the seabed users awarded agreements for

leasing are given clear priority of use in those areas identified for their respective projects or activities and that the presumption of implementing their project is established in planning terms at the earliest opportunity. The ability of proposed uses and activities to maximise the decarbonisation potential of available seabed resources and thereby underpin the achievement of Scotland and the UK's net-zero target should also be an important consideration in implementing an effective and timely system of marine spatial prioritisation.

- **Fisheries:** We recommend greater consideration for managing the interaction and relationship, specifically with fisheries, as the offshore wind sector continues to grow, as part of a separate fisheries sector-specific policy encompassing statutory conditions. Specifically, our members request consistent expectations for fisheries management and mitigation – including early engagement and compliance with FLOWW *Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Liaison*. We welcome the clarification that financial compensation to fishers in respect of potential displacement is not a material planning consideration and will not be required through NMP2. NMP2 should identify colocation opportunities but also recognise where it may not be possible and prioritise accordingly.
- **Energy:** It is essential that the NMP2 marine energy policy provides a supportive and clear consenting framework for energy projects, as this was lacking in NMP1, resulting in unclear expectations and inconsistencies in decision-making.

Whilst the colocation of multiple types of low-carbon or renewable energy technologies should be allowed where possible, the colocation of sectors should not be mandated and should only be considered broadly as a factor where appropriate. NMP2 could include a policy position relying on sectoral marine plans to establish the principle of development or use for specific activities within defined areas, as the process to identify such areas already includes extensive impact assessments and stakeholder engagement. Areas that have specifically been designated for renewables development should consider this factor most important when dealing with coexistence measures, as this would aid in maximising offshore wind potential.

When available, **our members support aligning NMP2 with the SMP-OWE**. This includes the proposal for strategic compensation to be identified at the plan level, which is critical for guiding smooth and proportionate consenting. Our members highlight at this stage, the scale of payments into a Marine Recovery Fund(s) should also be specified and agreed upon with Statutory Nature Conservation Bodies (SNCBs). This will allow strategic measures to be funded at an early stage, accelerating consent and project delivery. It also means that crucial time will not be spent agreeing on impact levels and compensation measures during the consenting process, as a solution (if required) is already in place.

To contribute to an integrated consenting framework, this policy should be included within NMP2 rather than being separate, as it is of critical importance for the timely delivery of renewable developments. Therefore, our members have proposed some key points to include within an energy specific policy below. We welcome further engagement with our policy ideas:

- Significant weight will be afforded to addressing climate change and reaching energy and net-zero targets set by the Scottish Government and UK Government.
- If a site has been identified and assessed through regional and/or sectoral plans for a particular purpose, then the principle of development should be established for that usage.

- Robust application of the mitigation hierarchy, with residual effects generally considered acceptable where appropriate design mitigation has been applied and demonstrated.
- Owing to the openness of marine environments and the scale of marine renewable energy development it is not appropriate to replicate the existing landscape criterion within NPF4 Policy 11 – Energy, which seeks to distinguish between localised and non-local landscape and visual impacts. Instead, NMP2 should include a simple test in respect of any residual significant seascape, landscape or visual effects stating that these are likely to be accepted if the social, economic or environmental benefits of the proposal outweigh the predicted impact.
- Development proposals should demonstrate how they contribute to the delivery of a Just Transition, including consideration of relevant socio-economic and supply chain impacts.

Importantly, our members propose that energy included in NMP2 should be aligned with critical national priority policy set out within the National Policy Statement for Energy Infrastructure EN-1. We note that the Scottish Government has already relied on this policy in consenting decisions and suggest that the development of a similarly aligned framework would be beneficial for Scottish ministerial determinations in the Scottish marine area, as opposed to relying on the UK policy.

- **Underwater noise:** Underwater noise is not currently a top risk to the deployment of offshore wind in Scotland’s marine environment. Future approaches to regulation should draw upon evidence from underwater noise monitoring projects which aim to reduce uncertainty and over-precaution in impact assessments.
- **Ports and Harbours:** As drafted, the wording of the Ports and Harbours section is very unclear as the text refers to existing NMP1 policy TP2 and indicates that an update is required without explaining what change is needed to align with NPF4.
- **Shipping and Transport:** It is not clear from the Shipping and Transport section what the requirement for an update to TP6 is, what needs to be included in the new policy wording, or why. *To what extent do stakeholders need to amend plans? What is the test or criteria?* The proposed blanket requirement to demonstrate the effects on shipping from a development or use is not precise or proportionate. A clearer policy could be that developments must mitigate significant effects on navigation in line with established tests, as the requirement to mitigate any effects is too broad. Our members suggest that ALARP – ‘as low as reasonably practicable’ is a fair test.
- **Cables:** SR members highlight that NMP2 should encourage shared use of cable corridors and data to inform these.

7. What are your views on the definitions being proposed for ‘co-existence’ and ‘co-location’ as set out below? Please provide any alternative suggestions.

Co-existence: “co-existence is where multiple developments, activities or uses can exist alongside or close to each other in the same place and/or at the same time.

Co-location: “Co-location is a subset of co-existence and is where multiple developments, activities or uses coexist in the same place by sharing the same footprint or area or infrastructure.”

Whilst the definitions seem clear, our members highlight the need for NMP2 to provide clarity on circumstances where coexistence and colocation are not possible and further provide clarity on prioritisation. This could be better achieved through additional sectoral planning.

We welcome separate definitions, and this points to a need for separate policies or distinct criteria rather than requiring demonstration of coexistence and colocation in tandem. These are separate terms and, therefore, should require separate tests. The proposed definitions of the two are too close, specifically in defining colocation as a subset of coexistence. An added emphasis on maintaining a positive working relationship between types of developments and users could be more emphasised within the coexistence definition. In addition, with these two words having significant contrasting meanings in application, the choice of when they are each used is crucial to get right.

It is not fully clear how colocation is being used along with the implications of this definition, as typically, colocation refers specifically to multiple types of developments sharing a location, i.e. a Battery Energy Storage System (BESS) on a windfarm site. However, if colocation implies users such as fisheries collocating with windfarms, for example, then there must be an understanding that this may not always be feasible, nor should it be expected in every location and situation.

Whilst our members acknowledge that there could be value in colocation being better enabled, we would be concerned about colocation potentially being required. This would add additional cost and complexity to offshore wind projects and bring risks of negative unintended consequences. Therefore, we propose that flexibility is provided for developers to incorporate colocation into/alongside their projects. Furthermore, coexistence expectations should be provided through useable and objective mechanisms, where priorities, responsibilities, and expectations can be clearly understood.

8. Do you think the policies relating to the 'Management of Pressures' should be updated, retained or accompanied by clearer implementation guidance? Please include any suggestions and/or changes, stating which policy you are referring to.

We support the continued application of policies to manage pressures, however, these need to be updated and carefully worded to ensure the tests can be proportionately applied across a range of individual circumstances. Our members agree that all policies should make clear the need for nature positive outcomes.

- **Shipping and transport:** The proposed blanket requirement to demonstrate the effects on shipping from a development or use is not clear or proportionate. A clearer policy focused on whether developments or uses are likely to generate significant effects on navigation and to mitigate such effects in line with established tests would be more appropriate.
- **Monitoring:** Any monitoring imposed on developments through consenting should have a clear purpose linked to the project and satisfy the established tests of reasonableness for planning conditions. Monitoring should also be included in packages of compensation / net gain measures funded by the Marine Recovery Fund(s) or equivalent. It is not appropriate for policies to mandate monitoring at development sites where there are no related significant adverse effects or uncertain impacts. Under the Environmental Impact Assessment (EIA) regulations, there is only a requirement for the decision-maker to consider monitoring measures in response to a predicted significant adverse effect. Monitoring of diadromous fish

needs to be considered at a strategic level rather than being required by offshore wind developers where there are no significant impacts. Further, we recommend aligning with the Marine Strategy Framework Directive (MSFD), Scottish Biodiversity Strategy (SBS), Diadromous Fish Strategy, Seabird Conservation Strategy and forthcoming Scottish Seabird Conservation Action Plan.

- **Noise:** NMP2 should not include policies setting out noise limits or mandating the provision of guidance to do so, as presently, there is insufficient evidence regarding both the spatial extent of disturbance effects on protected species, the population-level consequences and recent evidence has demonstrated there is significant conservatism in underwater noise levels from offshore wind piling in particular ([Range Dependent Nature of Impulsive Noise \(RaDIN\) Project](#)). Instead, NMP2 should promote the adoption of suitable Noise Abatement Systems (NAS) to mitigate likely significant adverse effects where necessary. NMP1 GEN 13 does not recognise the evidence gap regarding the severity and spatial extent of potential disturbance effects and does not take into account possible mitigation through the deployment of NAS. The draft NMP2 states that more monitoring is required but is unclear how this would fit into the consenting process, our members question *how new monitoring would reduce conservatism/consenting risk for subsequent projects?*

Accessibility and Wellbeing

From the available feedback we identified potential policy ideas for exploring with sector representatives, including:

- *preserving cultural heritage*
- *supporting coastal communities*
- *facilitating appropriate access to the sea (e.g. responsible access codes)*
- *minimising impacts on seascape character*
- *visual amenity*

Please read Section 5.6 Accessibility and Wellbeing in the Planning Position Statement (PPS) [consultation paper](#) before answering the following question(s).

9. What are your views on the policy ideas proposed under the 'Accessibility and Wellbeing' section?

Our members believe that due to the necessity to respond to the climate emergency, potential visual impacts on landscapes and seascapes from renewable energy developments should be considered as part of acceptability judgements rather than in isolation. Further, any landscape or seascape policy should avoid repeating the difficulty created under NPF4 Policy 11 - seeking to distinguish between local and non-local effects in order to determine the acceptability of each. The NPF4 policy 11 criteria, which states that localised impacts will generally be acceptable, has suffered from subjective and inconsistent interpretations from both consultee advice and decision-making. Instead, we suggest a more objective policy approach within NMP2 whereby significant landscape, seascape, and visual impacts recognise that such impacts are to be expected from renewable developments and should be accepted if the benefits of a proposed development outweigh this impact through positive contribution to climate targets, the economy, or social issues.

Our members highlight that impacts to tourism to date from offshore wind farms (OWF) have been negligible and that public perceptions regarding OWF have been shown to be largely positive. In a

[July 2022 Scottish Government study](#), 81% of respondents stated that the presence of an OWF would have no effect on their choice of destination. Further, a [BiGGAR Economics report](#) found no negative connection between how many tourists travel to an area and whether a windfarm is visible from that area. In NMP2, any potential impacts on tourism receptors from a development proposal will need to be assessed proportionately, with significant weight being afforded to the proposal's contribution to renewable energy targets and GHG emissions reduction targets. Additionally, when considering potential impacts on tourism, NMP2 policy should adopt a proportionate approach and start from the presumption that development proposals in the marine environment are unlikely to have significant adverse effects on tourism unless evidence demonstrates otherwise.

For island communities, our members suggest that NMP2 should include a coherent and proportionate policy setting out clear expectations for implementing a just transition through proposed marine developments and uses. Further, the updated National Islands Plan should be coordinated with NMP2 to ensure they are aligned and can both be utilised efficiently.

Our members highlight the need for clear policy expectations for any socio-economic benefits and community wealth-building outcomes, which could be delivered as additional complementary guidance. Additionally, it is crucial to align any NMP2 socio-economic benefits test with NPF4 to facilitate whole-project and cumulative consideration of net economic impacts. Where potential socio-economic impacts on the fishing industry are identified, clear, objective, and unambiguous, policy tests and thresholds should be set in NMP2 which can be applied consistently to determine impact acceptability on these receptors on a consistent basis. Further, SR members suggest that limiting access to reduce disturbance to seabird colonies could be a compensation measure; therefore, any policies should be mindful of this.

Implementation

The Marine Acts require that public authorities must take authorisation or enforcement decisions in accordance with the appropriate marine plans unless relevant considerations indicate otherwise.

National Marine Plan 2 (NMP2) will support decision-makers in making decisions in accordance with the plan. In line with feedback, and the outcomes of the statutory reviews, the implementation of NMP2 is being considered alongside the policy development. This includes considering and identifying the relationships and interdependencies across each of the policies in the plan.

Please read [5.7 Implementation in the Planning Position Statement \(PPS\) consultation paper](#) before answering the following question(s).

10. What are your views on the proposed policy ideas under the 'Implementation' section Please consider the role of the decision-maker and the potential introduction of prioritisation when responding.

To provide the greatest support to decision-making, SR members recommend that a full spatial plan should be developed with prioritisation given to projects tackling climate change and net-zero targets.

We agree with the proposals, i.e. decisions being made on sound evidence, consideration of cumulative impacts, and application of mitigation hierarchy, but this is largely actioned already. It is recommended that NMP2 should go further and introduce prioritisation.

We strongly support implementation being an HLO and a key part of the policy process for NMP2, and we strongly support the implementation proposal. To aid in implementation, for every policy topic, we support succinct policies that are not overly complex, and where there are key terms, tests, or expectations, these can be covered in further guidance. Within this, we support the statement of creating a monitoring and evaluating framework for implementation. Specifically, we propose a framework that would aid in streamlining consenting and implementation by improving evidence on the impacts and benefits of individual decisions.

Policy Co-ordination:

Our members support consultation with relevant communities and stakeholders at the pre-application stage, but we observe that this is already provided in most cases, so mandating it will not significantly impact consenting timelines. We support providing evidence of design for mitigation measures at the pre-application stage, and the mitigation hierarchy should be applied robustly and consistently at the earliest opportunity and throughout the process. There is a clear role here for the Sectoral Marine Plan (SMP) and associated impact assessments to highlight key issues at regional and plan option levels, which should then frame individual consenting applications. This should include identifying where mitigation measures and compensation are likely to be required and how their adequacy or appropriateness will be determined on an objective basis. As stated above, if compensation is required, the scale of impact should be determined at a regional/plan level so payments can be made into the Marine Recovery Fund(s) to accelerate consenting and ensure measures can be progressed before projects are consented.

Whilst section 5.7.1 mostly quotes requirements from the Marine and Coastal Access Act (MCAA) 2009, it is unhelpful to imply that marine plans are not relevant for authorisation and enforcement decisions without explaining the scope of this exemption. There is no legal impediment under the MCAA 2009 to the Scottish Ministers also identifying offshore marine planning regions and preparing regional marine plans covering Scotland's full marine region out to 200 nautical miles. In addition, we support implementing the recommendations of the Scottish Parliament's inquiry regarding Regional Marine Planning (2020). We support affording status to sectoral and regional plans, whereby if a development falls under sectoral and/or regional planning, then the assumption should be that the location is suitable for development. If our members have already found something acceptable for use, then it is acceptable.

Our members agree that it would not be appropriate for NMP2 to include full spatial mapping. However, NMP2 should provide clarity, enable and provide a strong framework for spatial approaches to be undertaken through sectoral and regional marine planning. We strongly support the prioritisation of space option, agreeing that spatial prioritisation policies are required and support all of the proposals.

While we welcome the reference and coordination to NPF4, the text could be clearer regarding the role and status of NPF4 in marine consenting. We maintain that a policy mechanism is needed to

provide clarity on whether NMP2 or NPF4 has primacy in the event of any conflicts or differing expectations in the determination of consenting applications aside from marine licenses (where it is clear that NMP2 would have primacy). This is particularly important for the determination of offshore Section 36 applications for renewable energy developments. It is clear from recent ministerial determinations that NPF4 is relevant to the consenting of such projects. However, we note that only limited NPF4 policy tests were engaged in these determinations. Therefore, NMP2 policies need to clearly explain how any differences in requirements should be dealt with.

We propose that any energy policy included in NMP2 should be aligned with the definition of critical national priority infrastructure in NPS EN-1, which was published after NPF4 was adopted. Since its release, the Scottish Government has relied on this document in decision-making in specific instances, and the development of a similar useable framework would be beneficial for decision making in the Scottish marine jurisdiction rather than relying on the UK policy.

Decision making:

Our members have experienced a lack of consistent application in individual consenting determinations, which has affected confidence in Scottish consenting systems and, in turn, investment. Our members, therefore, agree it is fundamental to ensure consistent application of NMP2, including all relevant policies, in decision making. To avoid the selective use of NMP2 policies, any implementation policy should require decision-makers to apply all relevant policies consistently, underpinned by decision-making that is effective, transparent, equitable, and predictable. Therefore, in principle, we support the proposals regarding evidence-based decision-making, providing that their requirements and application are always proportionate.

Our members strongly support the proposed inclusion of hierarchy and prioritisation policies, as they are important for efficient implementation and will help greatly in plan implementation. We suggest the introduction of a plan-led approach to sustainable development via policy hierarchy and an overarching consenting route map to ensure consistent and predictable decision-making across both local and national levels. This clear consenting route map should be combined with the adoption of an evidence-based principle for all decision-making.

Our members support considering ecosystem services in evidence-based decision-making, such as through nature-inclusive design (NID) and other outputs from the CEMNID project, as highlighted in our responses to Questions 4 and 5. We are also supportive of adopting a broader and more flexible approach to strategic compensation, which includes measures to protect and improve ecosystem functionality and resilience. The compensation fund should be used towards monitoring, research and packages of measures, including those that support wider ecosystem functionality. The fund should also be flexible so it can be applied to multiple regulations and contribute towards, for example, Measures of Equivalent Environmental Benefit (MEEB) and Marine Net Gain (MNG) in addition to compensation. There are still issues to resolve with mechanisms to deliver strategic compensation that must be addressed, including clarification over who is able to provide compensation (such as a third party on behalf of a developer), timing and scope of compensation, and the ability for authorities to identify where compensation is not required (must apply a proportionate approach and consider de minimis). Our members suggest the fund

operator should have the ability to deliver compensation at an early stage based on regional/plan-level assessments

Our members support the consideration of cumulative impacts affecting the ecosystem of the marine plan area being addressed through decision-making and plan implementation to aid in proportionality. Our members agree that a clearly defined mechanism through which cumulative impacts will be assessed in NMP2 will be crucial to ensure that Nationally Significant Infrastructure Projects (NSIPs) are not unnecessarily delayed due to the lack of a defined process. In addition, NMP2 should clarify the basis on which marine licensing and other consenting decisions will be made to provide transparency and predictability to applicants and consultees.

We support considering economic impact in decision making, but equally, decision making should take account of project need and viability. Any policy requirements to undertake adaptive management must be justified, realistic and proportionate.

11. If you agree that National Marine Plan 2 (NMP2) should include prioritisation: which outcome do you prefer i.e. space for a specific use given priority, space for nature given priority? Should additional outcomes also be considered? Please include any supporting information in your response.

Our members strongly support the prioritisation of space option included within the Planning Position Statement, agreeing that NMP2 should align with NPF4 to afford climate change and nature 'significant weight' in decision-making and that spatial prioritisation policies are required, supporting all the proposals listed. Our members suggest the term "significant weight" does not yet go far enough; projects which directly address climate change should be prioritised and should include critical national infrastructure. However, we disagree that the identification of areas would need to be outside of sectoral planning, and it is unclear why that has been proposed.

We encourage greater frontloading of consenting by deploying established sector marine planning processes and plans to confirm the establishment of the principle of development for offshore wind farms within leased areas at the earliest opportunity. In addition, we support affording status to sectoral and regional plans, whereby if a development falls under sectoral and/or regional planning, then the assumption should be that the location is suitable for development. If our members have already found something is acceptable for use, then it is acceptable. We support colocation and coexistence to be understood within this framework. Further, SR members agree that where areas are identified through sectoral planning, the expectation for co-existence should only be for where this is possible.

12. What are your views on policy ideas suggested in relation to 'Community Informed Decision-Making'?

SR members agree that where relevant, although for applications far offshore, e.g. offshore wind, this requirement could be limited as it can be difficult to define affected communities. We support a model of community-informed decision-making where it makes sense and allows for the inclusion of local people, but not as the basis for decision-making. Instead, decision-making should be planned, which requires clear and objective policies within NMP2 rather than decisions being

stakeholder driven. This helps in avoiding subjectivity by basing decisions on plans, especially as they have gone through fair democratic processes where anyone can provide input.

Impacts of proposed policies

13. Do you think the policy ideas in the National Marine Plan 2 (NMP2) will impact, either positively or negatively on any of the following: Marine sectors/businesses, consenting authorities, local authorities or any other planning decision makers? Please provide details. *In responding to the questions below it may be helpful to consider the potential implications on international or national competitiveness and Scotland as a destination for global investment.*

Our members largely welcome the ideas proposed in the NMP2 Planning Position Statement, providing a foundation for which a robust new national marine plan can be established. Our members suggest this could positively impact consenting timelines/ offshore wind sector if clear prioritisation is included for projects which address climate change and net-zero targets. The policy ideas proposed in this position statement are positive and heading in the right direction. **With targeted amendments to NMP1, alignment with NPF4 and other important policies listed in our response, and a focus on addressing the climate and nature crises, the final NMP2 will be a powerful tool to benefit Scotland's nature, decarbonisation, and economy.**

Delivering an implementable plan by coordinating NMP2 to NPF4 and other established policies/guidance will positively impact developers, local authorities, and decision-makers at every level of consenting. In turn, this will make the consenting process smooth, predictable, and proportionate (as well as replicable elsewhere), and will attract global investment and make Scotland competitive.

Prioritising consent and/or space for developments that help address climate change will reduce global greenhouse gas emissions, and specifically, Scotland's emissions will positively impact renewables developers, Scotland's economy, local communities (in the form of jobs, skills, investment, and community benefit funds) and make Scotland a destination for global investment in this sector, creating a positive cycle.

As the Planning Position Statement focuses on collating policy ideas based on stakeholder engagement undertaken to date rather than setting out settled policy positions, it is light on useable guidance for decision-making between now and the full draft NMP2.

We urge the Scottish Government to now move to quickly narrow and further develop a more coherent view on the suite of policy positions they intend to take forward into Draft NMP2 and to present these at the earliest opportunity through both engagement with Scottish Renewables, the NMP2 steering group and website publication.

This is needed to facilitate inclusive stakeholder engagement in the policy development process and to allow developers who intend to submit consenting applications prior to the publication of Draft NMP2 to take account of these emerging policy positions within their emerging assessments and applications.