

# Scotland's Renewables Routemap Short Life Task Force on Streamlining Energy Development Licensing and Consents

## Final Report

Scotland's Renewables Routemap  
Short Life Task Force on  
Streamlining Energy Development  
Licensing and Consents

Final Report

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## Final Report

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## **EXECUTIVE SUMMARY**

The short life Energy Planning and Consenting Task Force was established to bring together offshore renewable developers and environmental regulators to produce a report promoting greater streamlining and efficiency of Scotland's planning and consenting regimes, the aim being to enable us to meet our offshore renewable ambitions as set out in the 2020 Routemap for Renewable Energy in Scotland.

Utilising the experience of Scotland's regulators, statutory advisers and developers involved in offshore wind and marine renewables, the Task Force considered the existing challenges within the planning and consenting frameworks for Scotland's growing offshore renewables industries. It then recommended a number of actions to be taken forward where change could deliver yet more positive results.

The Task Force considered a number of areas concerning developers such as the access and sharing of environmental data, cumulative impact and resourcing within regulators.

Following two productive meetings, the Task Force agreed that the following recommendations should be adopted into the practices of Scotland's regulatory bodies and developers deploying projects in Scotland. The recommendations focus on further improving Scotland's planning and consenting landscape by requiring wide ranging early pre-application engagement, co-ordinating the collation of, and access to, relevant data as well as resourcing the regulators sufficiently to deal with the peak of project applications expected in the near future.

### **RECOMMENDATION 1**

**To give full support to the implementation of Marine Scotland's four main workstreams to deliver licensing efficiencies.**

**Delivery Timescale – Work is currently underway. Public consultation on a range of Licensing Policy Guidance papers and the offshore licensing Manual will be undertaken Summer 2012.**

### **RECOMMENDATION 2**

**To establish a national database for survey data, bringing in data from DECC, The Crown Estate and, at the appropriate time, developers.**

**Delivery Timescale – A review of progress made by August 2012 with full implementation by February 2013.**

### **RECOMMENDATION 3**

**To standardise the approach to data collection and assessment to ensure developers can use methodologies consistently and with confidence.**

**Delivery Timescale – A review of progress made by August 2012 with full implementation by February 2013.**

#### **RECOMMENDATION 4**

To encourage developers to follow advice set out in GP Wind's Good Practice Guide and 'How To' Toolkit.

Delivery Timescale – Work now being taken forward to promote the work of GP Wind to developers.

#### **RECOMMENDATION 5**

Developers and regulators should use a mandatory multilateral pre-application consultation process at the earliest opportunity.

Delivery Timescale – Practice now established.

#### **RECOMMENDATION 6**

To engage directly with the European Commission to gain endorsement for Scotland adopting a position of proportionate action for the planning for, and consenting of, offshore renewable energy projects.

Delivery Timescale - A meeting to be arranged with the European Commission for Spring 2012.

#### **RECOMMENDATION 7**

To increase capacity of Marine Scotland Licensing and Operations Team (MS LOT), Marine Science skilled resource and Call Off Consultants to assist in the determination process in anticipation of large numbers of offshore wind and marine renewable energy project applications. While respecting respective decision making responsibilities, a virtual team bringing together SNH and MS staff working on data collection and analysis should also be created.

Delivery Timescale – Expected to have staff in post by Summer 2012.

#### **RECOMMENDATION 8**

To prioritise and accelerate work on the identification of potential sites for new test facilities.

Delivery Timescale – Scottish Enterprise (SE) / Highlands and Islands Enterprise (HIE) commissioned a study to identify new test sites. Findings to be reported Spring 2012.

## **Monitoring Requirements**

Marine Scotland and Scottish Natural Heritage (SNH) will take ownership of the above mentioned recommendations to ensure they are adopted into their own working practices and those of developers. To ensure momentum is not lost and that the work of the Task Force has a lasting impact on the planning and consenting processes in Scotland, a progress report on implementation of the recommendations will be submitted to Fergus Ewing, Minister for Energy, Enterprise and Tourism and Professor Russell Griggs, Chair of the Scottish Government's Regulatory Review Group, as the Task Force's co-chairs in August 2012.

# **SCOTLAND'S RENEWABLES ROUTEMAP SHORT LIFE TASK FORCE ON STREAMLINING ENERGY DEVELOPMENT LICENSING AND CONSENTS – FINAL REPORT**

## **1. INTRODUCTION**

In order to meet our ambitions for the deployment of offshore renewable energy set out in the 2020 Routemap for Renewable Energy in Scotland, there is a pressing need to build on previous successes and deliver further joined-up, coordinated action around the development of licensing and consents. The short life Task Force was established to bring together developers and environmental regulators to produce an implementation plan for greater streamlining with the ultimate aim of realising Scotland's deployment potential.

## **2. BACKGROUND**

The Scottish Government and public agencies are firmly committed to the development of a successful offshore renewables industry in Scotland. The UK and Scottish marine legislation provide opportunities to deliver efficiencies in licensing and consenting processes and introduce best practice through the integration of marine planning to facilitate effective marine licensing. However, we have recognised that there are a range of issues which can be addressed to help deliver the establishment of these new sectors.

With the aim of improving and streamlining existing processes in mind, Fergus Ewing, Minister for Energy, Enterprise and Tourism established this short life Task Force. Utilising the experience of Scotland's regulators, statutory advisers and developers involved in offshore wind and marine renewables, the Task Force has considered the existing challenges within the planning and consenting frameworks for Scotland's growing offshore renewables industries and recommended a number of actions where change shall deliver yet more positive results. This report is the culmination of this work.

## **3. PENTLAND FIRTH AND ORKNEY WATERS WORKSHOP**

To inform their work, the Task Force set up a one-off Pentland Firth and Orkney Waters Planning and Consenting Workshop. This session involved developers, regulators, statutory advisers and policy makers. The purpose of this workshop was to tackle the issues where Government and/or developers had scope to influence/control and identify solutions to a number of issues concerning developers. These issues, as set out below, are shared across the offshore renewables industry:

- Potentially extensive surveying requirements to inform Habitats Regulations Appraisal (HRA – European sites/Natura)



- Potentially extensive surveying requirements in relation to European Protected Species (EPS)
- Lack of knowledge on device interaction with the environment
- Clarity surrounding various pieces of legislation e.g. deemed planning
- Challenges around reaching agreement over lease milestones
- Level of regulatory risk regarding protected species – is there a presumption of caution?
- Adequate resourcing within regulators and their advisers
- Cumulative impact of projects on environment
- Consideration of, and interactions with, other users of the sea

#### **4. EXISTING MARINE PLANNING PRACTICES**

To deliver marine licensing efficiencies Scottish Ministers believe that the application of marine planning techniques, rather than the commercial approach of lease bidding, will provide efficiency gains for both developers and regulators. Scoping work using strategic modelling, Regional Locational Guidance (RLG), to build on resource identification, environmental designation and other sector activities to inform development opportunities, is viewed as a material consideration for licensing and is used to identify Sectoral Plan options. Furthermore, Sectoral Marine Plans, underpinned by Strategic Environmental Assessment (SEA), HRA, socio-economics and consultation analysis, will also steer sustainable development, will address strategic legislative requirements and help avoid contentious and controversial proposals through the adoption of Plan options.

Marine Scotland's four main workstreams to deliver licensing efficiencies are:

- Form a licensing one stop shop to reduce the number of statutory/advisory bodies to contact during licensing and consenting processes, to bring clarity and introduce efficiency
- Produce an Offshore Renewables Licensing Manual to set out the licensing process and the topics to be covered
- Develop Licensing Policy Guidance to facilitate efficient licensing, such as the Survey, Deploy and Monitor approach, Rochdale Envelope and Section 36 Deemed Planning Policies
- Compile guidance on site monitoring and survey techniques to be used for licensing and consenting processes, SNH leads on this workstream

All four workstreams have been taken forward. Marine Scotland Licence and Operations Team (MS LOT) have trialled and now established a licensing one stop shop for marine renewables and offshore wind development. The Marine Renewables Licensing Manual is being redrafted to cover streamlined licensing provided under the Marine Act and expanded to cover offshore wind development applications. A working draft Survey, Deploy and Monitor Policy has been published and Marine Scotland is working on a range of Licensing Policy Guidance papers to provide clarity within the licensing process and intends to consult on the resultant Manual and Policy Guidance over the Summer of 2012. SNH has placed draft site survey and monitoring guidelines on its web site.

### **Task Force Recommendations**

The Task Force has found that there are still areas where improvements can be made under a culture of continual improvement to deliver efficiencies and reduce cost to industry.

#### **RECOMMENDATION 1**

**To give full support to the implementation of Marine Scotland's 4 main workstreams to deliver licensing efficiencies.**

## **5. SHARING AND SECURING BETTER ACCESS TO DATA**

During the Environmental Impact Assessment (EIA) process and post development, developers collect large volumes of environmental data regarding their site and the surrounding area which is usually retained by them. However, to aid both regulators and other developers, it would be hugely valuable to share this data. For example, SNH as the Scottish Government's statutory advisers, provide advice regarding the potential impact a development may have on the environment, and without access to the raw data, have indicated it is difficult to continuously review collision risk and the potential to update avoidance rates etc.

Marine Scotland has responded to developer concern articulated in the Autumn of 2011 over sea bird collision risk and displacement by developing a number of research initiatives. Initial work packages include identification of key at risk species, sea bird characterisation, geographic spread and review of assessment methodologies to take account of Scottish circumstances. Marine Scotland will work with The Crown Estate and industry to better understand risks, including cumulative impacts and will take account of bird data from areas around northern Europe, for example, Denmark, to help supplement lack of data. It will be essential that developers share data to allow robust cumulative assessments to be compiled. Marine Scotland would only expect assessment data and findings to be made available at the application stage.

Under the Crown Estate Commission led collaborative developer group process, developers are obliged to share information such as sea bird survey information. Additionally, most Round 2 and all Round 3 Leases and Scottish Territorial Waters

(STW) Agreements for Lease contain clauses requiring the tenant to share environmental data with The Crown Estate. The Crown Estate are then able to make this data publicly available for any reason taking into account when doing so certain constraints on what type of information can be made available and the period of time within which the data can become available. In addition, The Crown Estate have set up enabling funds which can assist in the identification, development and delivery of key issues that can assist at an industry wide level, for example the ornithological advice and research function that is being provided to The Crown Estate through their Strategic Ornithological Support Services initiative. The Crown Estate is also working with DECC to create a facility, known initially as the Marine Knowledge Exchange (MKE), for knowledge development based on collaboration and sharing in the marine renewables industry. This facility will hold various forms of information including some survey data.

Marine Scotland has established an environmental research programme (£1.6m) to examine marine renewables environmental impact unknowns and is developing a demonstration strategy to take advantage of early deployments and fund studies of key licensing issues to better inform future licensing. The programme and strategy will provide MS LOT and other statutory bodies with relevant background information on environmental effects without penalising initial developers by expecting unsustainable mitigation strategies or extensive pre or post deployment survey and monitoring.

### **Task Force Recommendations**

The Task Force appreciates the key role that robust data plays in considering the potential impacts that projects can have on the environment and in delivering a credible licensing and consenting process. It believes that sharing of data must be the norm. However it does believe there are ways in which the collection and handling of key data could be co-ordinated and shared to avoid duplication of time, cost and effort to developers and to respect commercial confidentiality.

Marine Scotland has already established a set of information sharing methods through the establishment of Marine Scotland Interactive, which hosts/will host sea bed mapping and sediment profiling, along with strategic survey information for sea birds and marine mammals. It also posts research and monitoring programmes and related reports on its web site, as well as Scoping, Regional Locational Guidance (RLG), Strategic Environmental Assessment (SEA), HRA, socio-economics, consultation analysis and plan reports, including the related data sources. Marine Scotland will therefore consider how it can improve the access to these data and report sources in a manner which will aid developers and other stakeholders.

### **RECOMMENDATION 2**

**To establish a national database for survey data, bringing in data from DECC, The Crown Estate and, at the appropriate time, developers.**

This database should build on the Marine Scotland Interactive and Strategic Studies approach and should be readily accessible to developers, regulators and planners and could be added to as new research, monitoring, assessment and survey work is

completed. Data held within a database could be drawn upon by regulators, developers, other bodies and the public. There is significant potential for consenting applications to minimise the cost and time taken to survey areas where data already exists. Where new data for the database is considered necessary, this work could be funded by all interested parties, including the relevant developers on an equitable basis. The database should incorporate both data gathered by developers and that collected through strategic regional or national studies. The database could also hold data on wildlife interactions with turbines, as this becomes available through Impact Monitoring Programmes.

It will be important to work closely with The Crown Estate and DECC in the development of the Marine Knowledge Exchange facility to ensure the objectives and information held on this facility and the database complement each other.

## **6. CONSISTENCY OF MODELLING APPROACHES**

Consistency in the various models used by the developers is important to ensure that environmental assessments are based on standardised approaches to data collection and subsequent assessment techniques. This ensures all applications are treated in the same manner and regulators are able to build up expertise and deliver efficiencies in application handling.

Marine Scotland will consider how to develop impact assessment models (wind, wave and tide), to ensure they reflect Scottish circumstances. Work on bird collision and displacement assessment methodologies, including cumulative effects, for offshore wind farms has already begun, as has work on a visual impact assessment methodology as part of the Licensing Manual review process.

Marine Scotland will work alongside and take full account of others taking forward related work. We will however ensure that we accelerate or cover Scottish circumstances where it is practical to do so. The Strategic Ornithological Support Services (SOSS) are undertaking work to update the standard bird collision risk model and it is important that users of the model apply it in a consistent manner. Modelling variations may be required for different bird species etc but these should be fully documented. Similarly, SNH have a published visualisation model standard, however there are other methodologies being used which is confusing for developers, regulators and members of the public.

### **Task Force Recommendations**

The Task Force believes that consistency across assessment methodologies is important to create an environment of fairness, transparency and confidence in the techniques used. The Task Force welcomes the progress that has already been made in this area but would make the following recommendation where further work could be taken forward.

### **RECOMMENDATION 3**

**To standardise the approach to data collection and assessment to ensure developers can use methodologies consistently and with confidence.**

Marine Scotland and SNH have a responsibility to encourage developers to use the various models and methodologies in a consistent manner across all offshore renewable projects in Scotland and developers have a responsibility to use the methodologies commended by the Regulator. It is also important that the various consultancies used by developers and regulators are included in the refinement of methodologies and models to ensure the widest possible buy in. However, effective progress must be maintained. Such an approach will be strengthened by the hosting of further Good Practice Events for Developers and Regulators as SNH have already done and by regular meetings/consultation on marine planning, licensing and related research undertaken by Marine Scotland.

## **7. SHARING OF BEST PRACTICE**

GP Wind is an EU initiative led by Scotland where a series of thematic case studies are used to learn from, and identify, best practice in the onshore and offshore wind industries. Whilst the majority of Scotland's experience to date has been in the onshore wind sector, it is important that the lessons learned from our extensive onshore and developing offshore experiences are used, and where possible, translated into both the onshore and offshore environments. For this reason, a number of the case studies set out within GP Wind will be offshore specific.

The various work streams will help address the barriers to offshore wind generation, specifically by recording and sharing good practice already underway and reconciling objectives on offshore renewable energy with wider environmental objectives within a culture of continual improvement.

### **Good Practice Guidance and Toolkit**

The environmental issues are routinely addressed by applying specific consent conditions which must be complied with and by developers finding innovative ways of monitoring and mitigating impact. There are lots of examples of good practice with respect to this. Some examples include:

- At the Greater Gabbard offshore wind farm (off the coast of Suffolk, England), the Rhyl Flats offshore wind farm (8km off the North Wales) and development in Liverpool Bay, regulators placed conditions on the consents to limit implications of noise disturbance on spawning sole. These included installing over two seasons and stipulating that no piling work was to take place in certain periods. In the case of Liverpool Bay, the consultation process provides a very good example of good practice which reduced the initial construction restriction. This reduced the cost of the project to the developer by minimising delays in the construction timeline.

- Scroby Sands offshore wind farm and the Alpha Ventus offshore wind farm in Germany have both set up research and testing facilities to provide regulators with reliable and real time data on coastal processes and scour. The success of these projects has provided the regulators with the reassurance that decisions on potential impacts in such situations as building near or on sandbanks can be supported by evidence.
- Clear and focused consultation with regulators and key stakeholders can provide developers with the most up to date advice on the most appropriate data sources, and whether any additional surveys would be required. Where there is overlap between the location of spawning events/nursery grounds and the vicinity of the development site, construction work should be timed to minimise impacts.

Experience from UK offshore wind farms suggests that these issues need to be considered further as the costs associated with gathering the data to comply with consent conditions can be substantial. This will be even more significant as more projects are being constructed further offshore. Effective data sharing between developers, regulators and NGOs will be crucial to the development of offshore wind. It will also be necessary for the cumulative impacts to be assessed in order to inform appropriate restrictions/ requirements but at the same time, the appropriateness of the precautionary principle needs to be weighed against increasing targets with respect to renewable energy. In particular, the way Natura 2000 requirements are imposed could helpfully be reviewed so that the standard of proof is more attainable.

On the human and commercial side, early consultation with affected stakeholders is of high importance on all issues as stakeholders are found to be sceptical when they have inadequate information or precedents to refer to. Good practice includes:

- Spatial planning to optimize the use of marine space to benefit economic development and the marine environment. For example, the EU “Roadmap for Maritime Spatial Planning”, “Blue Seas Green Energy” - the Sectoral Marine Plan for Offshore Wind in Scottish Territorial Waters, the Spanish "Environmental Strategic Study of the Spanish Coast for the Installation of Offshore Wind Farms" - the first planning document for regulating offshore development and the Danish “Future Offshore Wind Power Sites -2025”.
- Close engagement with fisheries and other users of the sea - “Blue Seas Green Energy” is a good example of how an agreement can be reached to meet every party’s demands and constraints. Local fishery associations and Tarragona harbour have been contacted regarding the Zéfir Test Station project (Spain) which has helped them to understand the issue of offshore wind and they have been assisted in negotiations for future offshore commercial projects. Belgium has identified for development a 200 km<sup>2</sup> area far from the shore (to avoid local population’s opposition) which has no conflict with other economic activities.

Regional workshops are taking place with the aim of reaching agreement with stakeholders on the elements of good practice to be developed in the Good Practice Guide. This guide and ‘How To’ kit will be produced by Spring 2012, as well as the recommendations that specifically relate to applications for the development of offshore and onshore wind farms.

## **Task Force Recommendations**

The Task Force agrees that the sharing of best practice and using the lessons learned from other sectors can improve development planning within onshore and offshore renewables sectors.

### **RECOMMENDATION 4**

**To encourage developers to follow advice set out in GP Wind's Good Practice Guide and 'How To' Toolkit.**

## **8. NEED FOR EARLY PRE-DEVELOPMENT CONSULTATION AND COLLABORATION**

Pre-development consultation is essential and speedy progress can be made at an early stage by multi-lateral pre-development consultations involving all of the regulators, planning authorities and statutory consultees. This early dialogue approach is encouraged in the Marine Scotland Licensing Manual. The focus of these meetings should be on agreeing the broad details of the project which would include the timescales for taking the development forward.

Engaging with other users of the sea (fisheries, shipping, recreational users, communities etc.) is also important. Therefore, a model encouraging developers to engage with these sectors is considered important for ensuring open and constructive dialogue as projects are planned and deployed. Pre application consultation is already provided for in the Marine (Scotland) Act and set out in the Licensing Manual.

The Crown Estate has set up three developer groups for offshore wind covering the Moray Firth, the Firth of Forth and West coast areas, as well as a Pentland Firth and Orkney Waters Group for wave and tidal. These developer groups were formed to promote collaborative discussions regarding the deployment of offshore renewable energy developments in particular regions to consider regional issues. It is important that these groups are aware of potential solutions through policy, research or science to these issues which may shorten considerably the time taken at the licensing stage. Early engagement with Marine Scotland Planning, Policy, Science and Licensing is encouraged to ensure the full scope of solutions and issues can be discussed. Developers are encouraged not to leave issues to the licensing stage as this will restrict the scope and potential timescales to develop solutions.

## **Task Force Recommendations**

There should be a team of 6 scientists established within Marine Scotland Science to cover marine ecology, ornithology and marine ecosystem issues to aid developers with assessments and to support MS LOT, SNH and the Joint Nature Conservation Committee (JNCC) at the application stage. This team will add a resource for developers to use in the preparation of the best quality applications and provide the licensing/consenting authority with advice and support in the pre-determination

process. The Crown Estate developer groups should be made aware that there are policy, research and science solutions to issues which can be used prior to the licensing stage. If issues can be resolved beforehand, the licensing stage can be more straightforward.

## **RECOMMENDATION 5**

**Developers and regulators should use a mandatory multilateral pre-application consultation process at the earliest opportunity.**

## **9. FURTHER DEVELOPMENT AND SIMPLIFICATION OF ADVICE**

Advice is already available to developers on the Marine Scotland and SNH websites. MS will undertake further application of Scoping and Regional Locational Guidance (RLG) to identify the best areas to develop marine renewable energy. It will provide developers and regulators with required information to inform site selection and assessment. RLG will provide the basis to focus strategic survey application of sea birds, marine mammals, sea bed mapping and coastal shelf modelling thereby providing more certainty to developers at the licensing stage. This is in parallel with the work underway to set up a statutory marine planning system for Scotland.

MS has launched a one stop shop to deal with licence applications through the Licence Operations Team (MS LOT), to simplify the regulatory/statutory advisory processes. MS has also produced a marine renewables licensing manual to set out the licensing process and provide advice to developers on assessment requirements. This is currently being updated and will also cover offshore wind energy development.

SNH are also working to simplify guidance on survey methods and the assessment process. However, the lack of experience of undertaking this kind of assessment is a barrier – until more experience is gained it will be difficult to offer a definitive view on the levels of survey effort and assessment required.

An opportunity also exists at the European level through the proposal for guidelines in Trans-European Energy Infrastructure. This legislative proposal aims to create a single framework for priority infrastructure projects in energy, transport and digital networks. This proposal is welcome as it makes a move towards many of the streamlined processes which Scotland has already adopted in terms of streamlined permitting procedures and the ‘one stop shop’ approach. This ‘one stop shop’ approach is of particular interest as the European Commission is looking at ways in which to harmonise EIA with other EC assessment obligations such as SEA, Water Framework Directive (WFD) and Natura/HRA. The European Commission is moving towards a position of more proportionate action in the way in which energy projects are being planned, considered and consented. The Scottish Government welcomes this move as it reflects those that are being taken in Scotland amongst policy makers and regulators to move towards a model which takes a proportionate approach to the planning/consenting of offshore renewables projects whilst proactively managing the risks involved.



## Task Force Recommendations

A great deal of positive work has already been done in the area of simplification of advice and streamlining of procedures. The work now being undertaken at the European level to introduce guidelines in Trans-European Energy Infrastructure provides further opportunities for Scotland to consider what additional work we can progress in the spirit of that being taken forward in Brussels.

### **RECOMMENDATION 6**

**To engage directly with the European Commission to gain endorsement for the way in which Scotland is adopting a position of proportionate action for the planning for, and consenting of, offshore renewable energy projects.**

Scotland has a lot of experience on the benefits of sharing and promoting best practice through our work on onshore planning and consents and the GP Wind project. Marine Scotland will liaise with the Scottish Government EU Office (SGEUO) in Brussels to discuss how we should interact effectively with the Commission to take forward the promotion of Marine Scotland planning and licensing techniques and to learn from other European partners. This will include participation in the GP Wind initiative.

## **10. RESOURCING**

The offshore renewables industry sees resourcing as an obstacle to deployment and has questioned whether there is sufficient staff resource to meet the expectations of industry and to support the offshore renewable energy sector in Scotland.

Marine Scotland has built a resource plan, following interactions with industry, natural heritage advisors, The Crown Estate, Scottish Renewables and Scottish Government colleagues, to balance Marine Scotland renewable licensing resources against projects.

MS LOT is currently in the process of recruiting staff to raise staffing levels in line with the prospective programme of applications. The cost of increased staff numbers has to be met from fees and correspondingly Marine Scotland will seek the industry's views on a Statutory Instrument (SI) increasing fees.

SNH have also taken on new caseworker advisers, but there is still a need for marine mammal and ornithological experts 'in-house'. There is difficulty in recruitment and retention of good, experienced staff, especially in the latter case, with consultancies often offering higher remuneration. SNH has the ability to use call off contracts for advice, but this needs to be managed carefully to avoid any conflicts of interest.

MS also has contingency plans in place using a Procurement Framework which allows mini competitions to bring in consultancy staff to carry out Environmental Audit and Reporting on developer applications based upon workload requirements.

The Framework will be used to complement MS LOT and Science skills and will fit with the MS Science additional team of six scientists brought in to cover marine ecology, ornithology and wider marine ecosystem issues.

### **Task Force Recommendations**

There is a concern across the offshore renewables industry that given the similar development timelines for offshore wind and wave and tidal projects in Scotland, that there is a real risk of a bottleneck of applications emerging. Marine Scotland has responded to this threat through a focused recruitment plan to provide LOT and Science with more expert staff and through a process of procuring relevant consultancy services to audit application documents.

### **RECOMMENDATION 7**

**To increase capacity of Marine Scotland’s Licensing Operations Team, MS Science skilled resource, and Call Off Consultants to assist in the determination process in anticipation of large numbers of offshore wind and marine renewable energy project applications. While respecting respective decision making responsibilities, a virtual team bringing together SNH and MS staff working on data collection and analysis should also be created.**

Adequately resourcing the regulators and their statutory advisers is key. Additional staff will require higher application fees to fund them.

## **11. TEST FACILITIES**

Test facilities are particularly useful and important for testing novel foundation designs and advances in turbine technology such as new blade designs. They also have a crucial role in helping to understand device interaction with the environment, the results of which can inform and simplify future consenting. Test facilities can also play an important role in industry sharing data. Better testing de-risks the deployment of turbines, and de-risking enhances the attractiveness of investment. Currently, industry views the deployment of test devices as being more onerous than it should be.

The Enterprise Agencies are currently looking at the current deployment and testing requirements of industry.

EMEC has already decided to expand its facilities, starting with provision for additional tidal (array) test facilities. EMEC is in discussions with Scottish Government’s Offshore Renewable Energy Policy Team, Marine Scotland and the Crown Estate over potential areas in which to develop these facilities.

## Task Force Recommendations

### **RECOMMENDATION 8**

**To prioritise and accelerate work on the identification of potential sites for new test facilities.**

Once suitable locations have been identified, a speedy approach should be taken, working in an open and collaborative manner with the local planning authorities and stakeholders, to secure the necessary planning approvals and move forward with the construction of the necessary infrastructure.

Alongside proving of technologies, generating data on environmental interactions of test devices will be a core objective of existing and future test facilities.



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