

## **How to Respond**

### **Responding to this consultation**

You are invited to respond to this consultation by 13 November 2013 using the form in Appendices D & E.

**Please send your response with the completed Respondent Information Form (see 'Handling your Response' below) to:**

Responses can be sent by email, by post or by online electronic response form:

Email: [Marine Environment Mailbox@scotland.gsi.gov.uk](mailto:Marine_Environment_Mailbox@scotland.gsi.gov.uk)

Post: MPA Network Consultation  
Scottish Government  
Marine Planning and Policy Division  
Area 1-A South  
Victoria Quay  
Edinburgh  
EH66QQ

On line: [www.scotland.gov.uk/consultations](http://www.scotland.gov.uk/consultations)

If you have any enquiries please send them to [Marine Environment Mailbox@scotland.gsi.gov.uk](mailto:Marine_Environment_Mailbox@scotland.gsi.gov.uk) or call Sebastian Howell on 0131 244 5301, Michael McLeod on 0131 244 5562 or Paul Cook on 0131 244 0381.

We would be grateful if you would use the consultation questionnaire provided in your response as this will aid our analysis of the responses received. This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>.

The Scottish Government has an email alert system for consultations, <http://register.scotland.gov.uk>. This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). It complements, but in no way replaces SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

### **Handling your response**

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the **Respondent Information Form** which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately. If you ask

for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

### **Next steps in the process**

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library and on the SEConsult web pages. You can make arrangements to view responses by contacting the SG Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

### **What happens next?**

Following the closing date, all responses will be analysed and considered to help us make a decision on the shape of the MPA network. We aim to issue a report on this consultation process in early 2014.

### **Comments and complaints**

If you have any comments about how this consultation exercise has been conducted, please send them to Sebastian Howell. (0131 244 5301 or [Sebastian.howell@scotland.gsi.gov.uk](mailto:Sebastian.howell@scotland.gsi.gov.uk)).

### **The Scottish Government Consultation Process**

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However, in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

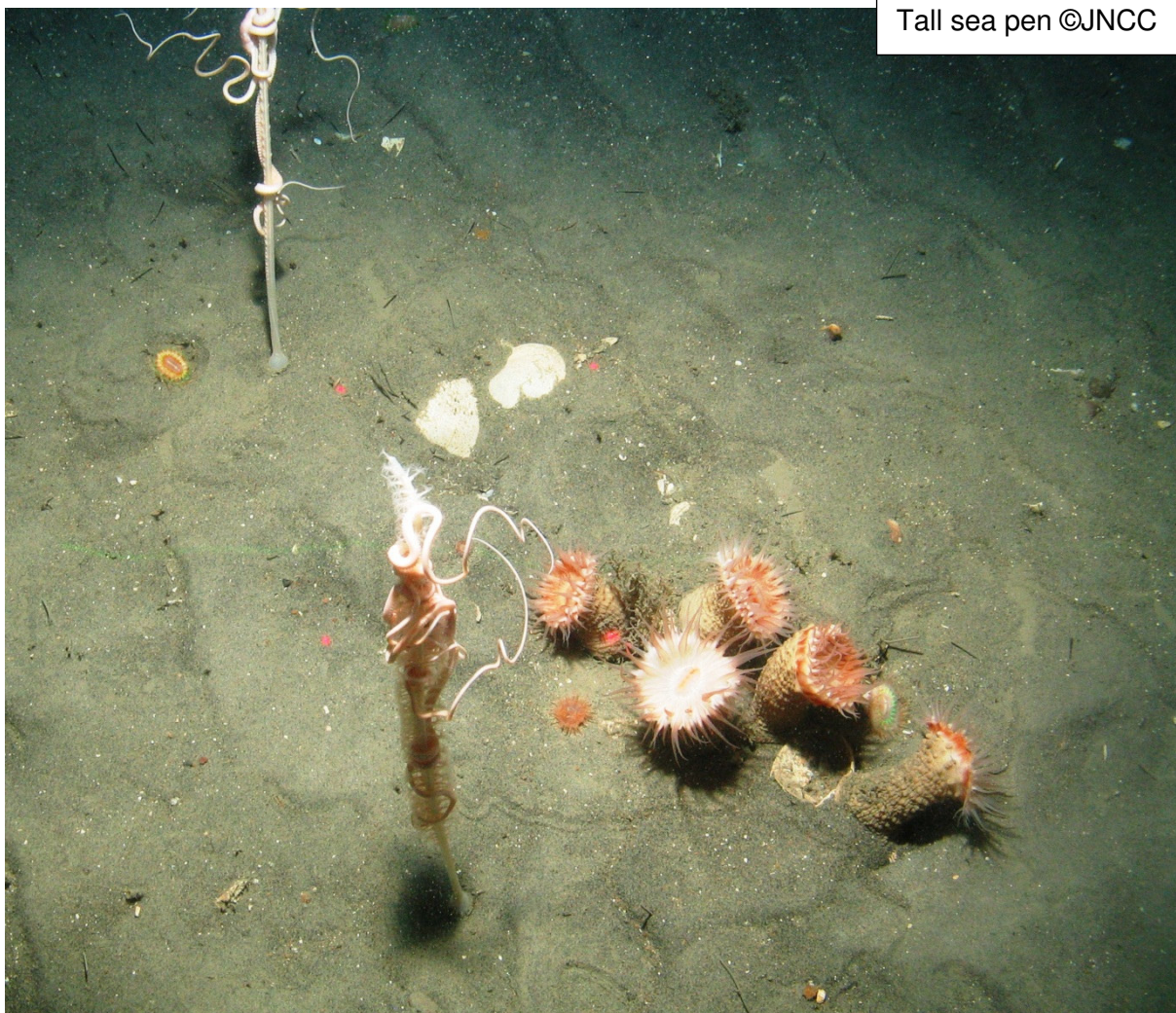
Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses.

Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises.

Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH113XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (e.g. analysis of response reports) can be accessed at: Scottish Government consultations (<http://www.scotland.gov.uk/consultations>) The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may: indicate the need for policy development or review; inform the development of a particular policy; help decisions to be made between alternative policy proposals; be used to finalise legislation before it is implemented. Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

**While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.**



## **CONSULTATION QUESTIONS**

### **1. Do you support the development of an MPA network in Scotland's Seas?**

Yes / No

In principal National Grid supports the development of a MPA network. However we wish to ensure that the designation of MPAs is balanced alongside the need for energy infrastructure provision including energy generation, its transmission and its security of supply, both now and into the future.

A general point of relevance to all proposed MPAs is that careful routing at project planning and optioneering stages minimises potentially sensitive areas. In addition agreed mitigation measures, including construction techniques can further mitigate potential impacts. Cables are ideally laid in soft sediments and whilst the laying of marine electricity cables and pipelines can potentially disturb the seabed for a short period of time during construction, the seabed quickly recovers and the infrastructure is benign during operation. Construction and maintenance activities are subject to control measures enforced through marine licensing to minimise impacts on their surroundings. As a result we would anticipate that, subject to the conditions of a marine licence MPA management measures will allow for the laying and maintenance of electricity cables and pipelines.

We are also currently working on proposals for an interconnector between the UK and Iceland. Still in the early stages of development, until we have identified a landing point and marine route, the cable could interact with all proposed MPAs in or around the north of Scottish coast.

Our comments below highlight where we are currently developing proposals for transmission infrastructure provision within the proposed MPAs.

## **Individual possible Nature Conservation MPAs**

### **2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Clyde Sea Sill* possible Nature Conservation MPA?**

Designation:

Yes /No

National Grid and ScottishPower Transmission are working together in a joint venture to build the Western Link, a project to bring renewable energy from Scotland to Wales and England. The Western Link project includes direct current subsea and underground cables, incorporating a converter station at each end of the link to change the electricity from direct current to alternating current to enable it to be used within the existing electricity transmission system.

The cable route passes through the proposed Clyde Sea Sill MPA. Due to the extent of the MPA it would be impossible to avoid the MPA. We consider that the transient nature of the cable installation would result in temporary impacts on the habitat and marine birds and as a result will not have long-term detrimental impacts should the proposed MPA be designated.

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

**3. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East Caithness Cliffs* possible Nature Conservation MPA?**

Designation: Yes  No

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**4. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East of Gannet and Montrose Fields* possible Nature Conservation MPA?**

Designation: Yes / No

National Grid and Statnett, the Norwegian Transmission System Operator, are progressing the development of the North Sea Network (NSN) interconnector between Norway and Britain. NSN will be a 1,400MW high voltage direct current (HVDC) link between the Norwegian and British transmission systems. The link will be 720km in length and will connect Blyth in North East England with Kvildall in Norway and is anticipated to be operational by around 2020. The route of the NSN intersects the south eastern part of the proposed East of Gannet and Montrose MPA for a distance of 15km; however the footprint of the cable is very small in comparison to the overall size of the proposed MPA. We therefore consider any impact on the proposed MPA as minor, and continue to liaise with Marine Scotland and the JNCC on the proposals.

Management Options: Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

**5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**6. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Fetlar to Haroldswick* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**7. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Hatton-Rockall Basin* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**8. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Creran* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No



Comments

All of the above:

Yes  No

Comments

**9. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**10. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart to the Sound of Jura* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**11. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sween* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**12. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Lochs Duich, Long and Alsh* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**13. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Monach Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**14. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Mousa to Boddam* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**16. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west Orkney* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west sea lochs and Summer Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Noss Head* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Papa Westray* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Rosemary Bank Seamount* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Small Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *South Arran* possible Nature Conservation MPA?**

Designation:

Yes / No

The Western Link project (see question 2) cable passes approximately 4.2km southeast of the designation boundary. Due to the distance from the proposed MPA, the nature of the installation activities and proposed mitigation we do not anticipate any significant impacts on the proposed MPA.

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

**23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Turbot Bank* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments



Socioeconomic Assessment: Yes  No

All of the above: Yes  No

**25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Upper Loch Fyne and Loch Goil* possible Nature Conservation MPA?**

Designation: Yes  No

Management Options: Yes  No

Socioeconomic Assessment: Yes  No

All of the above: Yes  No

**26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windsock)* possible Nature Conservation MPA?**

Designation: Yes  No

Management Options: Yes  No

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Wyre and Rousay Sounds* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

## **Choices to represent features in the MPA Network**

**28. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea, do you have a preference or comments on the following combinations to represent these features, bearing in mind Turbot Bank will need to be designated to represent sandeel in this region:**

- Firth of Forth Banks Complex
- Turbot bank and Norwegian Boundary Sedimentary Plain
- Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain

The Firth of Forth Banks Complex could be affected by our Eastern High Voltage Direct Current (HVDC link) marine cable route. The need for a potential east coast submarine HVDC link is currently being assessed by Scottish Hydro Electricity Transmission, Scottish Power Transmission, and National Grid Electricity Transmission. Connection points in the north east of Scotland, central Scotland, and north east England are being considered. It is currently expected that the link will be required post 2020. The development of this 2 GW link will facilitate increased power flows across the Scotland to England transmission network. Should the Firth of Forth Banks Complex be designated there may be scope to avoid the proposed MPA through further route refinement. However, it should be noted that as a regulated company we have a duty to comply with the requirements of the Electricity Act, 1989. Our licence, established under this Act, requires us to develop, maintain and operate economic and efficient networks and to facilitate competition in the supply of electricity in Great Britain. Should we be required to bypass the proposed MPA this would increase costs and ultimately impact upon consumers.

In order to avoid any potential conflicts (however minor these may prove to be) we would prefer that the Firth of Forth Banks Complex is not designated a MPA. We would be pleased to discuss this further with Marine Scotland.

The Norwegian Boundary Sediment Plan in it's current location does not interact with the North Sea Network (NSN) as it is approximately 85km north of the cable route (please see our response to question 4 for more details). Should the proposed MPA boundary be altered we would be pleased to discuss the impacts of this with Marine Scotland.

**29. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal**

**sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea?**

Yes  No

Comments

**30. Recognising the scientific advice from JNCC included alternatives for representing the burrowed mud feature in the Fladens, do you have a preference or comments on the following combinations to represent these features, bearing in mind the part of Central Fladen (known as Central Fladen (Core)) containing tall seapen (*Funiculina quadrangularis*) will need to be designated to represent tall seapen in this region:**

Central Fladen pMPA only

The tall sea-pen component of Central Fladen, plus Western Fladen

Or the tall sea-pen component of Central Fladen, plus South-East Fladen.

Comments

**31. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing the burrowed mud feature in the Fladens?**

Yes  No

Comments

**32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:**

South-West Sula Sgeir and Hebridean slope

Or Geikie slide and Hebridean slope

Comments

**33. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?**

Yes  No

Comments

## **Sustainability Appraisal**

**34. Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?**

Yes  No

Comments

## **Final Thoughts**

**35. On the basis of your preferences on which pMPAs should be designated, do you view this to form a complete or ecologically coherent network, subject to the completion and recommendations of SNH's further work on the 4 remaining search locations?**

Yes  No

Comments

**36. Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?**

Yes / No

On a general point we feel this document might benefit from further information on the procedures/processes that an applicant would have to undertake in the event of a scheme impacting on a MPA. Additional information would also be helpful on the implications of MPA designation. For example, if an application is determined prior to MPA designation but construction does not commence until after MPA designation what impact will this have? We would welcome further information and assurances that such an instance would not delay/complicate development.