



## **Draft Updated Sectoral Marine Plan for Offshore Wind Energy**

August 2025

### **Introduction to Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 50 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Marine Group.

### **Response**

**1. Do you agree that up to 1 Gigawatt (GW) of Test and Demonstration projects should be included within the scope of the updated Plan? Please provide any comments you have on their inclusion or proposed parameters.**

We support the inclusion of up to 1 GW of Test and Demonstration (T&D) projects in principle, as these can play a valuable role in advancing innovative technologies that support nature-positive offshore wind development. Such projects can help trial techniques aimed at reducing bird collision risks, minimising underwater noise during construction, or enhancing habitat restoration outcomes. However, the current plan provides insufficient spatial definition and environmental baselines for these projects, which limits the ability to assess their cumulative environmental impact. To ensure environmental integrity, the plan should establish clear parameters for ecological risk assessment and monitoring, including robust pre- and post-deployment environmental monitoring. Findings from T&D projects should be systematically reviewed and used to inform future planning and licensing decisions, ensuring that innovation directly contributes to improved environmental outcomes. With the proposal to site such projects in inshore waters, careful siting will be necessary to minimise visual impacts of such developments.

**2. Do you have any comments on how the benefits of offshore wind development could be maximised? If referring to development within a certain region, please specify.**

Offshore wind development offers significant potential to contribute to Scotland's net zero goals and broader sustainability objectives. To maximise these benefits, the plan should embed nature-positive



design and ecological co-benefits into all stages of project development. For instance, developments can integrate features such as artificial reef structures or habitat enhancements that support biodiversity and ecosystem functioning. Strategic co-location with other sectors, such as oil and gas decarbonisation projects through the INTOG round, can also reduce spatial pressures and promote efficient use of marine space. In areas like the Moray Firth, where baseline data and grid infrastructure are relatively well established, targeted planning could help optimise environmental and economic benefits while minimising risk. Ultimately ensuring that offshore wind development enhances, rather than compromises, the health of marine ecosystems, that visual impacts from developments visible from the coastline are minimised and the marine historic environment is protected in developments, will be key to its long-term success.

### **3. Do you have any comments on how social impacts could be mitigated?**

To mitigate social impacts, it is essential that coastal and island communities are engaged meaningfully and at an early stage in the planning process. Transparent, inclusive consultation should form the foundation of decision-making, particularly in areas where visual or cultural impacts may be significant. Community benefit schemes should be designed to reflect local priorities and could support initiatives such as marine stewardship programmes, climate adaptation projects, and skills development for young people. Encouraging community-led monitoring and citizen science could also help ensure local knowledge informs both project design and long-term oversight.

### **4. Do you have any comments on how economic impacts could be mitigated?**

Economic impacts on existing marine users, particularly fisheries, must be addressed through a just transition approach. This must include involvement in spatial planning, and in the case of fisheries could include support for gear adaptation and investment in co-management frameworks that ensure fishers have an active voice in decision-making. Developers should also be required to make robust commitments to local supply chains, ensuring that coastal economies benefit from job creation and skills development opportunities. Furthermore, potential disruptions to ecosystem services, such as nursery grounds or carbon storage, should be factored into economic impact assessments, with compensatory measures considered at this level where appropriate. Ensuring that environmental and economic resilience go hand in hand will be vital for public support and long-term sustainability.

### **5. Do you have any comments on how environmental impacts could be mitigated?**

The draft Plan appropriately applies a precautionary approach to environmental risk, but it must go further in implementing the full mitigation hierarchy of avoid, minimise, restore, and, where necessary, compensate impacts. In particular, stronger emphasis should be placed on avoiding development in ecologically sensitive areas where significant residual impacts cannot be mitigated. Addressing current gaps in data on seabird flight behaviour, marine mammal distributions, and fish migratory routes is critical to improving risk assessments and informing siting decisions. Where adverse effects on site integrity are predicted, especially for designated seabird features, all options for avoidance of impact



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must be explored and documented, and a precautionary approach is essential given the current status of many seabird species and populations. Compensatory measures must be science-led, outcome-focused, and subject to long-term monitoring. Environmental mitigation embedded in all projects to ensure offshore wind contributes to nature recovery alongside climate goals.

**6. Do you think the monitoring of environmental impacts of the draft Plan should be overseen by existing expert groups, or should a new expert advisory group be established for this purpose?**

Given the scale, complexity, and ecological importance of the draft Plan, we would support establishing a dedicated expert advisory group to oversee the monitoring of environmental impacts. A new group with broader representation from academia, environmental NGOs, regulators, community interests and industry (both renewable and other marine sectors) could provide greater transparency, independence, and adaptive capacity. A well-resourced and independent advisory body could help maintain public and stakeholder trust and strengthen environmental governance throughout the plan's lifespan.

**7. Do you have any comments on the proposed changes to the SMP-OWE governance structure?**

The move toward a more centralised and streamlined governance structure may offer some efficiencies, but it also risks weakening local and environmental accountability if not carefully designed. It is vital that governance reforms include meaningful mechanisms for participation from regional stakeholders, including community groups, environmental organisations, and fisheries representatives. A multi-level governance model that ensures transparency, accountability, and regional representation will be key to maintaining ecological integrity and stakeholder trust. Decisions made under the revised governance structure must continue to reflect the commitments of Scotland's Biodiversity Strategy and the national and international legal duties on environmental protection.

**8. Do you have any suggestions for how evidence should be shared and/or fed into strategic research programmes?**

The Plan should commit to open and transparent sharing of environmental data, impact assessments, and monitoring results through a centralised, publicly accessible data portal. This would enable independent scrutiny, support research, and facilitate cumulative impact assessment across projects. Strategic research programmes should be guided by the key knowledge gaps identified in the Plan, such as migratory fish connectivity, seabird collision risk modelling, and the ecological effectiveness of compensation measures. Close collaboration with research institutions, regulators, and NGOs is essential to ensure that new data and learning are integrated into decision-making processes in a timely and adaptive manner. A structured feedback system should be established to ensure that evidence gathered through monitoring and test projects is regularly reviewed and incorporated into plan updates and project assessments.



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**9. Do you agree with the approach proposed to remove the iterative plan review process and replace it with the stated evidence and future planning proposals?**

LINK members understand the Scottish Government's rationale for moving away from the current Sectoral Marine Planning process, particularly as the existing plan is now largely trailing behind leasing activity and project development, but we do not support a complete removal of the iterative plan review at this stage. In principle, developing an improved framework which allows policy to lead development would be welcome. However, the iterative plan review should not be removed for the existing plan. Many Option Areas remain active, with proposals already at consent, application or scoping stages, and continued review is essential to ensure robust adaptive management. Retaining the IPR during the current plan's lifespan will allow new evidence and monitoring results to be incorporated and will ensure that mitigation measures remain fit for purpose.

**10. If you have any further comments or points that you think should be taken into account in the plan, please provide those below.**

A key omission in the current Plan is the limited treatment of interactions between offshore wind infrastructure and the impacts of climate change on marine ecosystems. Sea level rise, ocean warming, and changes in species distributions are all likely to influence both project viability and ecosystem sensitivity in the years ahead. Incorporating climate adaptation considerations into site selection and design will therefore be critical.

The Plan should do more to explore synergies and trade-offs between climate and biodiversity goals. Offshore wind must be developed in a way that supports rather than undermines marine restoration objectives.

LINK members raised some concerns about the SMP-OWE in their response to the NMP2 Planning Position Statement consultation in February 2025, as follows: "LINK members also wish to raise a question about how sectoral policies and the interaction of the NMP2 with Sectoral Marine Plans will provide safeguards for the environment and sustainable marine activities against unanticipated large-scale developments. The Scotwind process is an example of where this has happened, with scoping areas originally proposed for a [maximum capacity of 10GW](#) but over 25GW of offshore wind projects then being leased during 2021-2022. LINK members fully support the sustainable development of clean energy and emissions reduction to tackle the global climate emergency, but this must be done with transparency and full assessment of environmental and socioeconomic impacts (e.g. on other sectors, such as fishing). Furthermore, there must be protection for public revenue from renewables developments that have been committed to environmental improvement. This year's Budget included the allocation of Scotwind revenue to address the [Scottish Government's budget deficit](#)".

**11. A policy review has identified that no aspects of the draft plan will impact on children's rights, as outlined briefly in Annex C. Do you agree with these findings? If you have identified any impacts on children's rights and/or wellbeing, please explain.**



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**12. Do you have any comments on the partial Business and Regulatory Impact Assessment?**

**13. Do you have any comments on the partial Island Communities Impact Assessment?**

**14. Do you have any comments on the Strategic Environmental Assessment Environmental Report?**

The SEA highlights potentially significant effects on historic environment features and their settings in two OAs – W1 and N4. Any development within these two particular OAs and any other OA that will have a significant adverse effect on historic environment features and their settings should not be allowed to proceed.

**15. Do you have any comments on the Habitats Regulations Appraisal Appropriate Assessment Information Report?**

We are concerned that the HRA concludes Adverse Effects on Site Integrity (AEOI) for seabird features and acknowledges that full mitigation is not possible. We strongly urge a precautionary approach, given the poor state of seabird populations, 70% of which are in decline. The use of compensatory measures must follow strict criteria, and should not substitute for avoidance of high-risk developments.

A key concern is that while AEOI have been identified on certain seabird species and SPA's there is no quantification of impacts. We understand that data is still being gathered and models run and because of this modelled numbers are not available at this stage. We have deep concern that impacts are being identified and a plan being produced based on this without the quantification required to indicate what level of compensation is likely to be required.

This concern is all the greater on the back of Berwick Bank having been recently consented yet we understand that it was not part of the HRA assessment because it is outside of the SMP.

**16. Do you have any comments on the Social and Economic Impact Assessment?**

**17. Do you have any comments on the Nature Conservation Marine Protected Area Assessment?**

The assessment identifies risks to key NCMPAs, including East of Gannet and Montrose Fields. We recommend that developments posing non-mitigable threats to site integrity should be excluded from leasing rounds.

**18. Do you have any comments on the Sustainability Appraisal report?**

**19. Do you have any comments on the Regional Locational Guidance?**



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This response was compiled on behalf of LINK's Marine Group and is supported by:  
Marine Conservation Society, National Trust for Scotland, RSPB Scotland, Scottish Wildlife Trust, Whale  
and Dolphin Conservation, WWF Scotland.

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