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Consultation – summary of response

Strategic Resource Areas for Marine Planning

A summary of the responses to the consultation on introducing a Marine Planning Notice identifying Strategic Resource Areas for tidal stream energy, as part of marine planning for Wales

August 2024

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This document provides a summary of the responses to the consultation on introducing a Marine Planning Notice identifying Strategic Resource Areas for tidal stream energy, as part of marine planning for Wales. We would like to thank all respondents for sharing their views with us.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Strategic Resource Areas for Marine Planning | GOV.WALES](#)



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Introduction

Welsh Government opened a consultation on 13 March 2024 on proposals for the introduction of a Marine Planning Notice (MPN) identifying Strategic Resource Areas (SRAs) for tidal stream energy.

The consultation closed on 5 June 2024. This document presents the summary of responses to the consultation, together with an overview of next steps.

Proposal

SRAs aim to ensure that the ability of future generations to meet their needs is not inappropriately compromised by short term planning and consenting decisions. SRAs identify areas of natural resource which may have potential to support future use by specific marine sectors (referred to as 'focus sectors'). Welsh National Marine Plan (WNMP) policy SAF_02 will be applied to identified SRAs. This aims to ensure that new development doesn't inappropriately and without careful consideration block the potential for focus sectors to submit future applications for consent to locate activity in these areas.

The identification of SRAs does not indicate support for or mean that development in these areas would be authorised. It also does not mean that a sector has to locate in an SRA. All developers (whether seeking consent to locate within or outside an SRA) will still need to apply for relevant consents, including demonstrating compliance with environmental regulations and WNMP policies on environmental protection and social issues such as seascapes and marine heritage.

This consultation asked for views on proposed SRAs for the tidal stream energy sector. Respondents were invited to submit views on the proposed SRAs, the mapping process by which the SRAs were identified, underpinning spatial evidence and whether further SRAs should be identified for other sectors.

Engagement

Views were invited as part of a 12-week consultation period between 13 March and 5 June 2024. The consultation was published on the consultation pages of the Welsh Government's website. Respondents were able to submit their views and comments on paper, by email or online, and in Welsh or English. The link to the consultation was emailed to a wide range of stakeholders including regulators, developers and industry representatives, public and local authorities, higher education institutions and environmental NGOs. Welsh Government held six online stakeholder engagement drop-in sessions during March, April and May to encourage attendees to respond to the consultation and to answer any questions.

Overview of responses

In total, the consultation received 19 responses. Of these, eight were provided via the online survey and 11 via email. One respondent wished to remain anonymous. A list of respondents other than those who requested anonymity is at the end of this document.

This document aims to present the broad views and themes that were provided in response to the consultation, rather than to reflect every individual response.

Summary of responses

The following section details the responses and comments that were received in relation to the consultation questions.

Two respondents provided a single overall response and did not provide separate answers to the individual questions. In these instances, where feasible, we have identified the question(s) to which each element of their response relates.

It is noted that some respondents made comments which are of relevance to marine planning more generally, but are beyond the scope of the identification of potential SRAs and the role of SRAs in safeguarding the future availability of broad areas of resource. We will ensure these wider comments feed into a forthcoming independent review of marine planning approaches and are followed up through that process.

Question 1 asked whether respondents agreed with introducing SRAs for tidal stream energy.

1. Do you agree with the proposal to introduce SRAs for tidal stream energy?

The majority of respondents agreed with the proposal to introduce SRAs for tidal stream energy. Support was expressed for SRAs as a planning tool which ensures the needs of future generations are considered in current decision-making. A number of respondents highlighted the significant contribution which tidal stream energy can make to both achieving net zero targets and to the Welsh economy. These respondents noted that lengthy timescales for consenting and deploying tidal stream energy mean that safeguarding the future availability of sites with good tidal stream resource through SRAs is critical to ensuring a healthy pipeline of future projects, and is therefore critical to the industry. Other reasons given for agreement included the role of SRAs in providing greater clarity on key areas with potential for future use. While outside the scope of SRAs, respondents noted that this will help support wider consideration around locations and levels at which development would be most sustainable, supporting integrated management of the marine area (instead of decisions being taken in isolation on individual development or sectors).

A small number of respondents, while agreeing with the proposal to introduce SRAs for tidal stream energy, called for greater consideration to be given to impacts on seascapes and environmental designations within SRA mapping and the Marine Planning Notice (MPN). One response, noting the correlation between the potential SRAs and environmentally sensitive areas, including designated sites, suggested that text be included in the MPN regarding additional requirements and limitations associated with environmental designations. This response also recommended that SRAs are reviewed and updated in line with technological advancements, to ensure planning policy does not constrain the siting of tidal stream energy away from the most environmentally sensitive areas, where technically feasible.

Two respondents disagreed with the proposal to introduce SRAs for tidal stream energy. Reasons for disagreement mainly related to calls for greater consideration to be given to seascape sensitivity and visual impacts on protected landscapes and concerns about displacement of fisheries by renewable energy development. Two respondents did not answer this question.

Question 2 asked whether respondents agreed with the spatial constraints applied in the identification of proposed tidal stream energy SRAs.

2. Do you agree with the spatial constraints which have been applied in the identification of proposed tidal stream energy SRAs?

The majority of respondents agreed with the spatial constraints (technical constraints, and hard constraints such as existing infrastructure and MoD Danger and Exercise Areas) used in mapping the potential SRAs for tidal stream energy, considering them appropriate and reasonable. Respondents acknowledged that the SRAs were mapped in line with provisions set out in the WNMP and that the

mapping and spatial constraints were developed and agreed based on extensive stakeholder engagement. There was also support for presenting soft constraints (such as environmental constraints and defence maritime navigational interests) as supporting evidence alongside SRAs, but not to use them to identify SRA boundaries. Respondents considered these issues are best considered during consenting of individual projects (including noting the Ministry of Defence should be consulted on proposals where there are potential defence maritime navigational interests). Respondents also noted that this approach enables new evidence and understanding to be reflected, ensuring planning and decision-making is based on best available evidence. One respondent, while acknowledging this is beyond the scope of SRAs, noted the importance of considering cumulative impacts of multiple development and understanding how much development can occur within ecological thresholds.

A number of respondents highlighted that the proposed SRA boundaries overlap with environmentally sensitive areas, including overlaps around Pembrokeshire and Anglesey with areas of search for potential Marine Conservation Zone designation. These respondents noted and welcomed text within the draft MPN highlighting that SRAs will not conflict with the designation and management of Marine Protected Areas (MPAs).

One respondent made some specific comments on technical constraints relating to the proposed South Wales SRA and the technical challenge caused by hard substrate. This respondent also discussed potential hard constraints relating to factors such as nuclear power stations and grid connectivity.

A number of respondents highlighted the importance of reviewing and updating SRAs and associated constraints mapping, as evidence and understanding develops. One respondent also highlighted the importance of clear and consistent messaging to ensure stakeholders understand the role and purpose of SRAs, while another respondent highlighted the importance of developers and decision-makers applying safeguarding policy relating to SRAs on a robust and consistent basis.

Two respondents, while not explicitly disagreeing, felt that constraints relating to shipping activity and navigational safety, grid connectivity, seascape sensitivity and visual impacts on protected landscapes should be given greater consideration in mapping SRAs. Another two respondents explicitly disagreed with spatial constraints used to map the proposed SRAs. Of these, one respondent considered that environmental sensitivities, including seascape sensitivity and visual impacts on protected landscapes, should be considered in identifying SRAs. The other respondent considered that areas of importance to fisheries should be taken into consideration and expressed concerns about the displacement of fisheries activity. Three respondents did not answer this question.

Question 3 asked whether respondents agreed with the proposed boundaries of the tidal stream energy SRAs.

3. Do you agree with the proposed boundaries of the tidal stream energy SRAs?

The majority of respondents agreed with the proposed boundaries of the SRAs tidal stream energy. Responses recognised the extensive stakeholder engagement which was undertaken to develop the proposed SRAs. One response described the proposed SRAs boundaries as well-considered and as balancing resource availability with hard constraints. Another response, while noting that some areas within the proposed SRAs have limited grid connectivity, supported their inclusion due to their longer term potential to support sector activity.

A number of respondents highlighted that the proposed SRA boundaries overlap with environmentally sensitive areas, including overlaps around Pembrokeshire and Anglesey with areas of search for potential Marine Conservation Zone designation. These respondents noted and welcomed text within the draft MPN highlighting that SRAs will not conflict with the designation and management of MPAs.

A number of responses also highlighted the importance of keeping the evidence used to map SRAs under review, and updating it as necessary. One response noted broad consistency between the proposed SRAs and The Crown Estate's Whole of Seabed programme mapping of areas of potential opportunity for tidal stream energy. This response noted that the Whole of Seabed's focus on mapping development opportunity – while SRAs map and safeguard the availability of broad areas of resource – sometimes results in some slight differences in areas identified.

One respondent felt unable to comment on the appropriateness of the proposed SRAs boundaries, as they believed greater consideration of seascape sensitivity and visual impacts on protected landscapes was needed. Another two respondents disagreed with the proposed SRA boundaries. Neither of these respondents gave explicit reasons for their response, although one respondent suggested SRAs could be focused further offshore, where larger devices and higher tidal stream generation capacity might be feasible in future. However, these respondents' answers to other questions indicate concerns around environmental and seascape sensitivities, grid connectivity and potential displacement of fisheries activity. Five respondents did not answer this question.

Question 4 asked respondents about any additional spatial evidence that should be made available to help understand relevant constraints and opportunities for each SRA?

4. Do you know of any additional spatial evidence that should be made available on the Wales Marine Planning Portal to help users understand relevant constraints and opportunities for each SRA?

The majority of respondents responded to this question, with four nil responses and a further four responses agreeing with the spatial evidence used and making no

further suggestions. The remainder of the respondents made suggestions for additional spatial evidence, focusing on grid connectivity, seascape sensitivity and visual impacts on landscapes, shipping and fisheries activity, bathymetry and environmental evidence (including site assessment and monitoring data from previous tidal stream energy projects, evidence on potential impacts of climate change and cetacean data). A number of respondents emphasised the importance of regularly reviewing and updating underpinning evidence and contextual data. Specific sources of evidence cited included the Plymouth Marine Laboratory led Marine Spatial Planning Addressing Climate Effects (MSPACE) project, environmental considerations mapping by NRW and Automatic Identification System (AIS)-generated shipping data and Inshore Vessel Monitoring System (iVMS) fisheries data.

Question 5 asked respondents whether potential SRAs should be developed for further sectors.

5. Do you consider that potential SRAs should be developed and brought forward for consultation for further sectors?

The majority of respondents supported developing SRAs for further sectors, variously mentioning wave energy, tidal range energy, floating offshore wind, marine aggregates, aquaculture and shipping. Reasons for supporting development of SRAs for further sectors included the role of SRAs in providing greater clarity on key areas with potential for future use, which would feed into wider work to consider locations and levels at which development would be most sustainable and support spatial coordination with Crown Estate leasing rounds. Respondents also highlighted the role of SRAs in encouraging dialogue between sectors on future resource use and co-existence.

A number of respondents highlighted the seascape and landscape sensitivity of the Welsh coast and noted the importance of ensuring environmental designations and seascape sensitivity are appropriately reflected within any further SRA mapping. One response also highlighted the importance of ensuring that SRAs are appropriately focused and not inappropriately widespread, if they are to be effective. This respondent considered it important to properly consider the need and justification for resource safeguarding through SRAs, and believed it is important to take a long-term view on this.

Only one respondent disagreed with developing further SRAs, citing responses to earlier questions, which expressed concerns about a lack of data on areas important for fisheries activity and displacement of fisheries due to renewable energy development. Three respondents did not answer this question.

Question 6 provided the opportunity for respondents to comment on the findings of the Sustainability Appraisal on SRA mapping.

6. Do you have any comments on the findings of the Sustainability Appraisal on SRA mapping?

Five responses were received to this question, four of which explicitly supported the findings of the Sustainability Appraisal. One response welcomed Welsh Government's decision to consult on proposed SRAs for a single sector in the first instance. This was a reasonable alternative identified by the Sustainability Appraisal, with the aim of understanding how SRAs can best deliver benefit before – if relevant and appropriate - proposing a wider suite of SRAs for further sectors. This response also recommended that the Sustainability Appraisal is used to inform the development of guidance on implementing SRAs. However, one respondent disagreed with the findings of the Sustainability Appraisal, citing concerns about the availability of data on areas important for fisheries activity and displacement of fisheries due to tidal stream energy development. The remainder of the respondents either did not answer this question, or indicated that they had no comments.

Question 7 asked respondents to consider the likely effects of introducing SRAs on the Welsh language.

7. What, in your opinion, would be the likely effects of the introduction of SRAs on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

The majority of respondents did not answer this question, or indicated that they had no comments. Of those who responded, the overall tone was positive. Although this is outside the scope of SRAs themselves, these responses highlighted the potential for tidal stream energy to provide employment opportunities and other local benefits for coastal and Welsh speaking communities. Beyond a general comment on the importance of treating both Welsh and English equally, no response related directly to the introduction of SRAs.

Question 8 asked respondents to consider whether any changes to the proposals in the consultation would improve positive impacts on the Welsh language and mitigate any negative impacts.

8. In your opinion, could the introduction of SRAs be formulated or changed so as to have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Two respondents responded to this question. The tone of both comments was positive, re-iterating comments made in response to the previous question (question 7) regarding treating both Welsh and English equally and the potential of tidal stream energy to deliver positive community and employment benefits.

Question 9 provided the opportunity for respondents to raise any related issues.

9. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Seven of the 19 respondents provided additional comments, the majority of which were supportive of the proposed SRAs. A number of responses noted the importance of developing clear guidance on implementing SRAs. One respondent highlighted the importance of reviewing and updating SRAs, as evidence and understanding develops. The evidence base being developed by The Crown Estate's Whole of Seabed programme was referenced by another response.

Although this is outside the scope of SRAs, one respondent discussed the significance of tourism to the coastal economy and noted the potential impact of tidal stream energy devices on the marine environment and on seascapes and designated landscapes. This respondent called for lessons to be learnt from previous tidal stream pilot projects, citing the importance of decommissioning and recovery of infrastructure and suggested this be referenced in the MPN. The respondent also suggested that community ownership could be usefully referenced in the MPN.

Two respondents referenced environmental constraints. These respondents confirmed their support for resource safeguarding through SRAs, while also emphasising the importance of considering environmental constraints during project consenting and noting that, in certain circumstances, environmental sensitivities might mean an activity cannot proceed. These respondents welcomed the text in the draft MPN on environmental constraints and the requirement to apply all environmental regulations and WNMP environmental policies to all proposals coming forward within (or outside of) an SRA. They also welcomed text highlighting that SRAs will not conflict with the designation or management of MPAs.

Alongside these supportive comments, one respondent expressed concerns about potential displacement of fisheries by renewable energy development and potential environmental impacts of offshore wind infrastructure and associated cabling. While this is outside of the scope of SRAs and this consultation, this respondent called for greater government attention to be given potential displacement of fisheries by renewable energy development.

Conclusion

Some respondents made comments which are of relevance to marine planning more generally, but which are beyond the scope of the identification of potential SRAs and the role of SRAs in safeguarding the future availability of areas of resource. We will ensure these wider comments feed into a forthcoming independent review of marine planning approaches and are followed up through that process.

Overall, the majority of responses received were supportive of the SRAs being proposed for tidal stream energy and the methodology used to map these SRAs. Respondents highlighted the potential of tidal stream energy to play a key role in the transition to renewable energy and net zero and the importance of safeguarding the availability of key areas of resource through SRAs to ensure a healthy pipeline of future projects. Respondents also cited the role of SRAs in providing clarity on key areas of tidal stream resource, facilitating dialogue between sectors and helping to ensure the future resource needs are considered in planning and decision-making. The proposed SRAs were welcomed by a number of respondents as an important component of a wider move towards integrated spatial planning. This welcome was accompanied by recognition that further work is required – beyond the scope of SRAs – to understand carrying capacity and locations and levels at which development would be most sustainable.

The majority of respondents also supported the development of further SRAs for further sectors (variously mainly mentioning other renewable energy technologies, marine aggregates and aquaculture), while noting the importance of effective implementation of SRAs, supported by clear guidance. Some respondents also highlighted the importance of reviewing and, where relevant, updating SRAs and associated constraints mapping, as evidence and understanding develops. While the majority of respondents expressed general agreement with the mapping methodology and spatial constraints used to identify SRAs, a number of comments were made on factors which respondents felt should be given greater consideration, together with suggestions for additional sources of spatial evidence.

A number of common themes emerged from consultation comments. As SRAs safeguard the future availability of broad areas of resource but do not assess suitability or provide support for development, many of these issues (although highly relevant and important to marine planning more widely) are outside of the scope of this consultation. Specifically, a number of respondents called for greater consideration to be given to seascape sensitivity and visual impacts on protected landscapes. A small number of responses disagreed with the proposed SRAs for this reason. Related to these, a number of respondents highlighted grid connectivity as a key consideration and stated this could be given greater prominence or used to identify SRA boundaries. Another common theme was comments on environmental constraints and sensitivities, with respondents noting potential overlaps between the proposed SRAs and environmentally sensitive areas, including designated sites and areas of search for potential Marine Conservation Zone designation. A number of respondents called greater information on relevant environmental designations and

sensitivities to be provided within the MPN while, in some instances, calls were made for environmental constraints to be used in mapping SRA boundaries.

A number of respondents commented on specific constraints, such as defence interests or the importance of navigational safety and busy shipping lanes. Another respondent made some specific comments on technical constraints relating to the proposed South Wales SRA. It is also noted that one response consistently disagreed with the proposed SRAs, calling for greater consideration to be given to fisheries interests, and citing a lack of evidence on areas important to fisheries and concerns over displacement of fisheries by marine renewable energy development. Again, this issue is of relevance to marine planning more generally, but is outside of the scope of this consultation on SRAs.

Next steps

Welsh Government is grateful to everyone who took the time to respond to this consultation.

As part of this consultation, we asked for feedback on proposed SRAs for tidal stream energy, together with comments on the mapping methodology used. We also asked for feedback on whether any further SRAs should be developed for further sectors.

Some respondents made comments which are of relevance to marine planning more generally, but which are beyond the scope of the identification of potential SRAs and the role of SRAs in safeguarding the future availability of broad areas of resource. In particular, these comments related to:

- grid connectivity (together with understanding the impact of cable landfall sites and routes);
- understanding and assessing the visual impacts of tidal stream development on seascapes and designated landscapes
- consideration of the impact of tidal stream energy on environmental sensitivities and designated areas such as MPAs; and
- developing understanding of important fisheries areas and potential displacement of fisheries by renewable energy development.

As SRAs safeguard the future availability of broad areas of resource but do not assess suitability or provide support for development, these issues (although highly relevant and important to marine planning more widely) are outside of the scope of this consultation. We will ensure these wider comments feed into a forthcoming independent review of marine planning approaches and are followed up through that process.

Alongside this, we will proceed with finalising the Marine Planning Notice (MPN) and associated SRAs for tidal stream energy. We are committed to working with our partners and stakeholders to progress work to support greater spatial specificity within our marine planning framework. As part of our collaborative approach, we will work with stakeholders and decision-makers to support implementation of SRAs,

including developing clear implementation guidance. While the consultation responses on assessing seascape and environmental impacts are, as discussed, not directly within the scope of resource safeguarding SRAs, we recognise that these factors are extremely significant and must be fully considered at a project-level. They should therefore be accorded due priority and attention during project development and consenting, and we note comments on the importance of explicitly highlighting this. We will ensure that important project-level considerations are clearly highlighted within both the MPN and the implementation guidance. In line with our obligation under Section 54 of the Marine and Coastal Access Act to keep under review the physical, environmental, social, cultural and economic characteristics of our seas and their natural resources, we will develop a bespoke directory of relevant spatial data relating to social and environmental issues and clearly signpost to this within the MPN. We aim to progress this work and publish the MPN introducing the first SRAs for tidal stream energy by the end of 2024.

We will also work with partners to develop proposals for further SRAs for other sectors, where planning for long-term resource safeguarding can add value by identifying key areas of resource and safeguarding their availability. In particular, we will initially consider the merit of developing and consulting on SRAs for floating offshore wind and marine aggregates, sectors where the evidence base enables us to map focused and discrete areas of resource for potential SRAs. Accelerating the development of floating offshore wind is critical to energy security and achieving net zero targets, while renewable energy development and energy security, housing, infrastructure and the economy are all underpinned by a secure supply of aggregates for building materials.

We also agree that there is merit to pursuing the SRA approach for sectors such as wave energy, tidal range and aquaculture. However, the current evidence base for these sectors is insufficient to enable us to identify focused and targeted SRAs. As emphasised by responses to this consultation, without sufficient focus, there is significant risk that SRAs fail to deliver benefit and become tick-box exercises. We will therefore take forward work to develop greater understanding of the resource and spatial needs for these sectors, enabling us to progress work to better define areas of resource where the SRA approach could usefully be applied. In particular, as outlined in the consultation document, we are committed to consulting our aquaculture stakeholders on proposals which would enable us to pursue potential SRAs for this sector.

List of respondents¹

- British Marine Aggregate Producers Association
- The Crown Estate
- Defence Infrastructure Organisation, Ministry of Defence
- Joint Nature Conservation Committee (JNCC)
- Marine Conservation Society
- Marine Energy Wales
- Menter Môn Morlais Ltd
- National Resources Wales
- The National Trust
- Pembrokeshire Coast National Park Authority
- Public Health Wales
- Royal Commission on the Ancient and Historical Monuments of Wales
- Royal Society for the Protection of Birds (RSPB) Cymru
- Royal Town Planning Institute
- Royal Yachting Association
- Seas the Opportunity
- UK Chamber of Shipping
- Welsh Fishermen's Association - Cymdeithas Pysgotwyr Cymru

¹ It should be noted that this is not a comprehensive list of respondents, it only includes the respondents who did not wish their response to be anonymous.