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RE: Marine Conservation Zones: Centrica Renewable Energy Limited's response to consultation on proposals for designation in 2013

To whom it may concern;

Thank you very much for providing Centrica Renewable Energy Limited ("Centrica") with opportunity to provide a consultation response to the proposed treatment of the Marine Conservation Zone ("MCZ") recommendations made by the four stakeholder-led Regional MCZ projects for a network of Marine Protected Areas ("MPA") under the requirements of Part 5 of the Marine and Coastal Access Act 2009 ("MCAA"). Please find within this correspondence Centrica's response to the questions posed within the Department for Environment, Food and Rural Affairs' ("DEFRA") document Marine Conservation Zones: Consultation on proposals for designation in 2013 ("the consultation document"). This response focussed on the two regional MCZ projects that Centrica has been involved in, namely the Net Gain and the Irish Sea Conservation Zone projects.

Centrica supports the United Kingdom ("UK") Government's vision for '*clean, healthy, safe, productive and biologically diverse seas*' and encourages the development of a network of MPAs around the UK's coastline to ensure that our most valuable habitats and species are protected. Centrica recognises that the creation of an ecologically coherent network of MPAs is required to help protect and improve marine ecosystems in accordance with the duty under the MCAA. Centrica welcomes the approach adopted by the Regional MCZ projects in ensuring the involvement of offshore industries and stakeholders in developing the proposals. Centrica has, however, expressed its concern that the identification of these MPAs and their features have not been subject to the same rigour and scrutiny as offshore development (whether offshore renewables, oil and gas or aggregate extraction). Ensuring that a similar burden of proof is required for both offshore development and the designation of sites of conservation importance would ensure that both industry and the public has confidence in the proposed network, without it being regarded as a further level of constraint and increased cost (both to the developer and to the energy consumer). The designation of MPAs must also to be considered in the context of

the wider marine management alongside Marine Plans and we advocate appropriate marine planning using the ecosystem approach.

Centrica also wishes to note its concern that the sites proposed for designation in the first tranche have not had management measures defined as yet. Centrica believes that it is difficult to comment on a site's suitability for designation, when it has not yet been determined what activities will be permitted within the site (and conversely those which will be prohibited). This, coupled with the lack of strong evidence to support the designation process has led to a lack of confidence in the process from many stakeholders in the marine environment.

Q1. Do you agree that this site and specified features should be designated in the first tranche?

Aln Estuary – Centrica is pleased to note that this recommended MCZ ("rMCZ") has a high degree of support from stakeholders and that the features proposed for designation have an acceptable level of data certainty. Centrica is also pleased to note that those features for which there is an unacceptable level of data certainty will require further work prior to designation. Based on this, Centrica agrees that this rMCZ should be designated in the first tranche.

Swallow Sand – The Swallow sand rMCZ contains the second largest area of subtidal coarse sediment in the in the MCZ project area and has an acceptable level of data certainty for the features proposed for designation in 2013. As such, Centrica supports the designation of this site, albeit with the caveat that it is concerned about the impacts that the designation of this rMCZ may have upon both the UK and non-UK commercial fishing sectors. Centrica hopes that dialogue with the fishing community continues during the development of the management measures for this rMCZ to ensure that both socio-economic and ecological considerations are taken into account throughout the designation process and beyond.

Rock Unique – Centrica is pleased to note that the majority of stakeholders support the designation of this site, although again it notes the impact of the designation of this rMCZ on the fishing sector and reiterates the statement made above regarding consultation throughout the development of management measures. Centrica is pleased to see that the three features recommended for designation have an acceptable level of data certainty, while the feature noted as having an unacceptable level of data certainty (low energy circalittoral rock) is not proposed for designation in 2013. This correlates with Natural England and the Joint Nature Conservation Committee's ("the SNCB") assertion that recent survey work has not confirmed the presence of this feature and as such, Centrica is of the opinion that this feature should not be designated unless evidence exists to suggest that the feature is present and confirmation is provided regarding the spatial extent of that feature.

Flyde Offshore (designation 2013) and *Wyre-Lune* and *Ribble* (both not proposed for 2013) have the potent to affect export cable route choices from the Centrica's Round 3 Irish Sea Zone ("Celtic Array") to landfall locations in the north-west of England. Due to the scale of the activities, Centrica believes that the export cable route should not significantly affect the proposed designations and should therefore be a permitted activity within the rMCZ. However, should this not be the case then Centrica cannot advocate the designation of these sites until this is resolved.

Q.2 Are there any additional features (not recommended by the Regional MCZ Projects) located within this site that should be protected?

Centrica is unaware of any additional features within any of the sites proposed for designation in the first tranche that require protection.

Q3. Do you have any comments on the proposed conservation objective(s)?

Centrica has no comments on the proposed conservation objectives ("CO") for either Rock Unique or the Aln Estuary rMCZ. However, Centrica has concerns that two of the CO for the Swallow Sand rMCZ are contrary to the CO proposed by the Net Gain group. Centrica questions the value of the stakeholder-led process, when the recommendations for conservation objectives arising from that group are not those proposed by stakeholders.

The Flyde Offshore has a 'maintain' objective and as the proposed features are of a very large scale (subtidal sand 260km^2 and subtidal sands and gravels 200km^2) it is therefore thought unlikely that the installation of export cables for Celtic Array would be deemed to have a significant effect. However, if this is not the case then Centrica cannot agree with the proposed CO as it stands. Again, the lack of firm management measures does not help any stakeholders in the marine environment to understand the potential implications of the rMCZ on their respective industries and we therefore believe that management measures should have been developed and consulted on at this stage of the process.

Q.4 Are there any significant reasons for alteration of this site's boundary? Please explain and provide evidence to support your views as necessary.

Centrica has no comment on the boundaries for those sites identified to be taken forward in the first tranche of designations. However, although we recognise that the North St. Georges Channel rMCZ is not proposed for designation as part of the first tranche, Centrica wishes to note that if the site goes forward in the future, we would recommend that the site's boundary is amended to ensure that through the choice of interest features, conservation objectives or management measures that the proposed designation is structures such that it does not restrict development of the Celtic Array project.

Q.5 Is there any additional evidence to improve data certainty for features within this site? If yes, please provide evidence.

Centrica is unaware of any additional data that would improve data certainty for any of the sites proposed for designation in the first tranche.

Q.6 Are there any additional activities (that may have an impact on the recommended features) occurring within this site that have not been captured within the Impact Assessment? Please provide evidence to support your views.

Centrica is unaware of any additional activities occurring within any of the sites proposed for designation in the first tranche that have not been captured within the impact assessment.

Q.7 Do you have any new information on costs to industry not covered in the Impact Assessment, that would be directly attributable to MCZs as opposed to costs stemming from existing regulatory requirements, or evidence that suggests the need for changes to the methodologies or assumptions used in estimating costs (including in relation to fishing displacement)? If yes please provide evidence.

Centrica does not have any new information on cost to industry not covered in the impact assessment for those sites proposed to be taken forward in the first tranche that have not been captured within the impact assessment.

However, Centrica wishes it to be noted that that the provision of costs for the economic impact assessment was made more difficult given that no management measures have been proposed to allow an accurate quantification of costs to be undertaken. Centrica notes that for rMCZ NG4 Wash Approaches, the consultation document states that there is a strong indication of a potentially significant socio-economic implication associated with the renewable energy sector and that further work will therefore be required to better understand this implication prior to this site being considered for future designation. Having provided a robust cost suite to the economic impact assessment, Centrica believes that the cited cost of an addition £405,000 per annum as a result of the designation of the rMCZ is precautionary (given the fact that the site overlies a candidate Special Area of Conservation ("cSAC")). However, as stated previously within this response, Centrica does not believe that costs cannot be accurately quantified until it is known what the management measures for the site are due to be; without this, industry simply cannot determine likely future costs and must therefore revert on a precautionary basis.

Further to this, Centrica believes that the costs proposed for the North St. Georges Channel rMCZ appear low at £304,000 per annum. If this rMCZ is proposed for designation in the future, then Centrica believes that it is worth ensuring that the Impact Assessment has accurate costs. Further to this and as previously stated, should the site be progressed, then Centrica would wish to see either the boundary being amended to fall outside of the Celtic Array area or ensure either through the choice of interest features, conservation objectives or management is tailored to enable unhindered development of Celtic Array.

Q.8 Do you have any new information that was not available or used in the Impact Assessment to inform or quantify the value the benefits of MCZs?

Centrica is unaware of any additional information to quantify the benefits of MCZ for those sites proposed in the first tranche. However, through our good working relationships with The Wildlife Trusts, Centrica urges DEFRA to consider the document '*Securing the benefits of the Marine Conservation Zone Network*' produced by The Wildlife Trusts to aid in quantification of the benefits of the MCZ process as a whole.

Q.9 You may wish to provide comments on other aspects of this consultation such as evidence requirements, identification and treatment of high risk sites. Where you disagree with the approach taken please provide evidence to support your views.

Centrica has concerns regarding the proposed treatment of sites and features in licensing decisions as outlined in Paragraph 4.1.19 of the consultation document. For those sites not designated in the first tranche, it is ambiguous as to how the regulators, developers and stakeholders should treat the sites. Centrica believes that there could be significant concern if planning a development within or adjacent to an rMCZ, which may or may not be designated at some point. Centrica strongly therefore requests that further clarity is provided and that this process be subject to consultation with those stakeholders and industries likely to be impacted.

Centrica also wishes to use this opportunity to state our supports for the MCZ process and the UK Government's vision for '*clean, healthy, safe, productive and biologically diverse seas*'. Centrica recognises that the creation of an ecologically coherent network of MPA is required to help protect and improve marine ecosystems in accordance with the duty under the MCAA.

However, Centrica wishes to reiterate its concern that the identification of MPAs and their features have not been subject to the same rigour and scrutiny as offshore development and that ensuring that a similar burden of proof is required for both offshore development and the designation of sites of conservation importance will ensure that the proposed network is not

solely regarded as a further level of constraint and increased cost (both to the developer and to the energy consumer).

Centrica also wishes to note that it believes that those sites proposed for designation in the first tranche should have had management measures defined as part of this consultation. Without these, Centrica believes that it is difficult to comment on a site's suitability for designation, when it has not yet been determined what activities will be permitted within the site.

Without a strong evidence base to support the designation process and a suite of management measures with which to assess the potential impacts of the designation of rMCZ on offshore industries, Centrica believes that it is difficult to support the further designation of rMCZs going forward until these issues have been satisfactorily resolved.

Yours sincerely,
For and on behalf of Centrica Renewable Energy Limited,

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