

CONSULTATION QUESTIONS

Q1. What are your views on the overall costs and savings identified in the Business and Regulatory Impact Assessments?

The costs and savings identified are very high level and do not consider the all the direct and indirect costs and savings which may occur, for example the time and cost implications to developers applying for a Marine Licence.

The cost of advertising and holding a public event is more significant than assumed within the consultation document as costs such as design and production of presentation materials, staff time, travel and accommodation costs etc have not been included.

As part of good consultation practice, Brough Head Wave Farm Limited (a joint venture between Aquamarine Power and SSE) would hold a public event during the EIA process. Additionally, as PAC is required under the town and country planning regime, it is likely that BHWFL would be required to carry out a public event and report on this anyway. BHWFL's key concern is whether the one public event is sufficient for both consenting regimes. If not, then there would be both duplication of costs and effort, and also raises the possibility of consultation fatigue amongst the local community.

BHWFL feels it is critical that the PAC requirements for a Marine Licence can be combined with the PAC requirements onshore, so that two public events for the same project is not required. Consequently, it will be important to ensure that timelines for advertising and reporting are the same so that duplication of costs and effort is not required, as well as potential confusion of the public due to numerous notices.

Q2. Do you agree with the registration process as described?

Yes

Q3. If not, what changes would you propose to the process?

n/a

Q4. Do you agree that the listed activities should be registerable, rather than licensable?

Yes No

Q5. Do you have further comments regarding the activities listed above?

no

Q6. Are there any other classes of activity that should be registerable?

The deposit of ADCPs/AWACs on the seabed should also be a registerable activity due to the low environmental impact of their installation on the seabed – in order to make the process less costly and onerous.

Q7. Do you agree that statutory consultees should not be specified in legislation for the pre-application consultation process?

Yes No

Q8. If not, which persons or bodies do you believe should be specified as statutory consultees for the pre-application consultation process?

n/a

Q9. Do you agree with the classes of activity that will be subject to pre-application consultation?

Yes No

Q10. If not, what activities would you add or remove from the list?

Does activity number 3 include pipelines?

Does activity number 4 include projects with a capacity of up to 30MW, or is it for projects over 30MW?

BHWFL believes that these types of activities should only be subject to PAC if the requirements can be streamlined alongside T&CP requirements, so that multiple public events/reports are not required.

Q11. Do you believe that the above proposals discriminate disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?

Yes No

Q12. If you answered yes to Question 11, in what way do you believe the proposals to be discriminatory?

n/a