

By e-mail

NationalGridESO Offshore Coordination project

Box.OffshoreCoord@nationalgridESO.com

28<sup>th</sup> October 2020

Dear Sir or Madam

### **Offshore Coordination Project**

Natural Resources Wales (NRW) is grateful for the opportunity to comment on the Grid Coordination Project.

The statutory purpose of NRW is set out by the Environment (Wales) Act 2016. In the exercise of its functions NRW must pursue sustainable management of natural resources in relation to all of its work in Wales and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW are also advisors to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

NRW is also an Appropriate Nature Conservation Body under the Conservation of Habitats and Species Regulations 2017.

NRW's role in relation to offshore wind is as a licensing authority under the Marine & Coastal Access Act 2009 for issuing Marine Licences and as a statutory consultee on strategic plans and on projects.

NRW's comments are therefore provided in the context of NRW's statutory purpose, functions, powers and duties.

In 2019, Welsh Government declared a climate change emergency and has a long-standing commitment to decarbonisation reflected in Welsh legislation and policy. At the same time, Welsh Government has, through its Nature Recovery Planning, recognised the need for urgent action to increase the resilience of our ecosystems in order to reverse the decline in habitats and species. NRW therefore recognises the need to maximise the deployment of renewable energy whilst at the same time ensuring that significant effects on the environment are avoided.

NRW welcomes the intention to deliver better coordination of grid infrastructure across projects given the benefits of reduced environmental impact and is very supportive of the project that National Grid ESO is undertaking.

Reducing onshore grid connection is likely to be particularly beneficial given the tendency of cable route optimisation to concentrate grid connection at a limited number of landfall locations, that would otherwise lead to increased impacts and consenting risk, and especially off the North Wales coastal where existing grid connection is already concentrated.

As requested we have provided responses to the specific questions posed in the consultation document. These are appended in an annex to this letter.

I hope that you find these comments helpful. If you have any questions regarding the response, please contact Andrew Hill ([REDACTED]) in the first instance.

Yours sincerely,



Mary Lewis  
Marine & Coastal Policy & Planning Team Leader

cc.

[REDACTED]  
[REDACTED]  
[REDACTED]

## Offshore Coordination project

### Consultation feedback form

We launched our consultation on **30 September 2020** and it closes on the **28 October 2020**.

Please use this form to send in your written feedback. If you would like to provide feedback via this route, we are also working with stakeholders to receive verbal feedback. Please contact us if you would prefer to provide feedback verbally.

We would like to publish responses to our consultation following its closure. Please can you confirm whether you would like us to treat your response confidentially by selecting one of the options below: (delete those that do not apply)

- ~~Confidential – please do not share the feedback or company~~
- ~~Confidential – you can publish the feedback without our name or sector included~~
- ~~Confidential – you can publish the feedback without our name but you are welcome to identify which sector we come from~~
- **Non-confidential – you can publish the full response**

*Throughout the consultation document we have asked some questions on our three reports that we would like your feedback on to shape our final documentation.*

*These are below and do not need answering if you do not have views. If you would like to provide any other feedback, please feel free to do so.*

## Holistic Approach to Offshore Transmission Planning Report

Q1. Do you agree with our assessment of the key technology and system risk barriers coming from the Holistic Approach to Offshore Transmission Planning Report?

N/A

Q2. Do you have any proposals on how to most effectively bring the technology to market for when needed?

N/A

Q3. Do you have any additional evidence to inform the assessment we have made?

N/A

Q4. Do you have any further feedback on the report?

N/A

## Cost-benefit Analysis Report

Q1. Do you agree with our assessment of the costs and benefits?

Although we recognise that these may be small relative to the overall cost of the grid connection, there are also costs associated with making consent applications, environmental monitoring and assessments and obtaining the related advice associated with each connection point. These costs, and the time taken to resolve any consenting issues, would be further reduced by an integrated approach.

Q2. Do you have any other evidence to support or challenge the assessment made?  
N/A

**Q3. What do you see as the potential impact on the environment of these proposals, particularly the reduction in the number of assets and landing points?**

NRW agrees that a reduction in cabling Infrastructure will reduce the risk of environmental impacts and consenting risk - although the impacts of the remaining infrastructure that is deployed may still result in significant environmental effects which will need to be assessed when the location and type of cabling infrastructure is known. It also seems likely that remaining connections will still connect at or close to points where existing connections have already been made raising the possibility of in-combination/conflicting effects with existing infrastructure.

Q4. Do you have any further evidence on the potential social and community impacts of these proposals? We would particularly welcome responses from local authorities on this question.  
N/A

**Q5. Where do you see value for further work to build on and test these findings? Either from the proposed list or beyond?**

It is highly likely that even after better grid coordination has been achieved, remaining connections are likely to be concentrated in coastal areas where existing grid connection has already been made. Grid connection on the north Wales coast seems likely to increase significantly under the current approach, but the integrated approach, whilst beneficial overall, is likely to result in additional connections in south-west Wales. These areas either host existing grid infrastructure, or are likely to as and when other energy technologies are deployed, and numerous other activities also take place in these locations.

Much of the Welsh coast could be sensitive to impacts from offshore and onshore connection infrastructure. Large areas of the Welsh coast fall within sites designated for their nature conservation interest under EU and national legislation (Special Areas of Conservation, SSSI's etc) and much of our coast is in or near an area designated for its landscape interest (National Parks, Areas of Outstanding Natural Beauty, Heritage Coast, World Heritage Sites etc).

Not all of these areas are designated for features that would be sensitive to cabling activity but the extent of designation is a good indicator of potential risk and the need for detailed assessment at the project level, which might be avoided if the areas that are particularly sensitive have been identified in advance.

It would therefore be sensible to undertake more detailed analysis of the sensitivities and capacity at likely landfall areas. Undertaking this work as part of a strategic study carried out by government and, or National Grid, rather than leaving to individual project developers or transmission operators, would help to inform coordination options and might help to encourage adoption of the integrated approach by operators.

Greater integration can also result in benefits to the onshore grid network relative to the status quo. However, the reports do not present any analysis of the likely need for upgrades to the onshore network that will be needed to accommodate the large increase in overall power generation. Although this will be dictated by the location and scale of development that results in practice, it would be sensible to develop an understanding of the implications of onward transmission for onshore networks and for this to have an influence on the final designs and grid connection points of the integrated networks.

## Offshore Connections Review Report

Q1. Do you think that if the areas we are highlighting were improved, that the ability to coordinate projects would be significantly increased?

N/A

**Q2. Do you think we have missed anything in our offshore connections review that would add value and increase coordination?**

The analysis does not appear to take account of floating offshore wind. Given the potential and large appetite for floating offshore wind, especially off the south-west coast of England and Wales, an assessment of scenarios that incorporate floating offshore wind would appear to be necessary.

It will be necessary to fully consider the consenting strategy for the building of cabling infrastructure not directly associated with single projects. When considering the consent for the cabling infrastructure, it is necessary to consider whether a consent for the primary infrastructure being served (i.e. the windfarm) would likely be forthcoming (or vice versa), to comply with regulatory requirements and to avoid consenting stranded assets. If the cabling infrastructure is proposed prior to any specific developments coming forward, it will be challenging to make this consideration. It will therefore be necessary to clarify responsibility for the consent and build of the integrated cabling system in advance so that the deployment of offshore transmission assets can be coordinated with the deployment of the wind farms within the cabling system that they will rely upon.

Cabling infrastructure is likely to span jurisdictional boundaries and this may introduce additional complexity to the consenting process. For instance, cabling passing from UK waters into Welsh waters might also need a separate marine licence from Welsh Ministers (in addition to any marine licence deemed through the Development Consider Order for the portion of cabling in UK or English waters). This has the potential to cause complications especially if applications for the DCO and Welsh marine licence are not well coordinated.