nationalgridESO

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 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)

- **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.

The RSPB welcomes the opportunity to engage in this consultation. Our written feedback is provided below, we have made no comment here in response to the specific questions.

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?

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

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

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

Cost-benefit Analysis Report

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

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

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?

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.

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

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?

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

Do you have any other feedback, if so please add below. Many thanks for taking the time to provide written feedback. When we publish our final documentation, we will let you know what we have done with the feedback and how it has shaped our work.

The RSPB supports urgent action to tackle the climate and nature emergency. Decarbonising energy is a vital part of efforts to reach net zero, however urgent action is required to ensure action on climate change does not deepen the threat to nature. In order to phase out fossil fuels, the deployment of renewable technology must be significantly increased – in the right places. Unchecked and without action to alleviate additional pressures, renewable energy deployment – particularly offshore wind – looks set to significantly threaten the future of our wildlife including globally important breeding seabirds. A sustainable energy transition as part of a Green Recovery offers the potential to decarbonise in harmony with nature by deploying well-sited renewables, ensuring a mass roll out of energy efficiency measures and implementing meaningful conservation measures to ensure thriving wildlife. Action must be urgent and transformative; failure to act within this decade – indeed within the early 2020s – risks potentially devastating and irreversible effects on nature, our planet and the UK's ability to ensure the sustainable and timely energy transition necessary to reach net zero.

Introduction

The Intergovernmental Panel on Climate Change's (IPCC's) most recent report has made it clear that globally we must reach net zero emissions by 2050[1]; the RSPB is calling for a more ambitious target of net zero greenhouse gas emissions by 2045 in the UK. The IPCC highlights that "*rapid, far-reaching*" and "*unprecedented*" changes to the way society operates are needed to tackle the climate crisis. It also highlights the devastating impacts on ecosystems of failing to achieve the emissions reductions needed to limit temperature rises to 1.5^{o}C. A net zero future therefore requires urgent action in this decade to change our energy system, shifting from dependence on fossil-fuels to increased generation from renewable sources as well as greatly reducing our overall energy demand. Amid a nature and a climate emergency, the need to reconcile the challenge of increased low carbon infrastructure deployment and threats to biodiversity has never been more urgent.

The UK Government, as host of the upcoming 2021 UN climate summit in Glasgow, has already expressed its ambition to be a global leader in the fight to save nature. As noted in the RSPB's A Lost Decade for Nature, if these claims of leadership are to be credible, the

[1] The 2050 target is supported by the Committee on Climate Change (CCC). The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This target is supported by the CCC. Due to the magnitude of the threat and urgent need for action to limit global temperature increase the RSPB is calling for net zero by 2045.

UK will need to set out how it plans to fill the gap between rhetoric and reality in its own backyard. Governments must take the urgent action needed to change the fortunes of wildlife and reach greenhouse gas emissions targets as part of coordinated action for a sustainable energy transition.

Offshore wind and associated infrastructure

The current approach to designing and building offshore transmission was developed when offshore wind was a nascent sector and industry expectations were as low as 10GW by 2030. In the context of increasingly ambitious targets for offshore wind, constructing individual point to point connections for each offshore wind farm may not provide the most efficient approach and could become a major barrier to delivery given the considerable environmental and local impacts, particularly from the associated onshore infrastructure required to connect to the national transmission network. Offshore wind is expected to play an important role in delivering net-zero emissions by 2050, and it is right that the framework for delivering offshore transmission connections is reviewed in the context of our increased ambition.

The RSPB welcomes timely consideration of offshore transmission networks as part of wider action on marine energy technology deployment during the 2030s and the UK's efforts to reduce greenhouse gas emissions. To ensure sustainable and timely deployment of technology in the 2030s, action is required during the 2020s to address barriers and unlock sustainable deployment in harmony with nature. This includes the consideration of emerging technologies and urgently improving the deployment of fixed offshore wind – deployment of renewables in the 2020s should not be considered a done deal requiring no further action. In fact, how the marine environment is used and managed in the 2020s will have significant implications for deployment in the 2030s in terms of space, cumulative environmental impacts, the health of our seas and strategic connections.

An energy transition

A low carbon energy transition must phase out fossil fuels and strategically increase the deployment of sustainable renewable energy infrastructure on both land and sea. The UK has set ambitious targets for offshore wind, however there are significant barriers to the sustainable expansion of this sector including the cumulative impacts of increasing infrastructure on nature. Particularly when combined with unalleviated wider pressures in the marine environment.

Offshore renewables infrastructure includes turbines as well as associated cabling and grid connections. In our busy and increasingly crowded sea space, the consenting of all infrastructure and activities must be considered within one transparent and strategic planning system. Such an approach would provide routes for increased efficiency, colocation and reductions in environmental and societal impacts.

Increased offshore wind deployment & ecological impacts

We recognise the significant role renewable technology, particularly offshore wind, can and must make to the UK's decarbonisation as part of efforts to reach net zero. However, without significant and urgent transformation of the planning and policy frameworks in which these technologies (offshore wind, emerging floating wind and tidal) are deployed alongside coordinated action to relieve pressures on the marine environment, the RSPB does not believe that the trajectory for future development – in the 2020s or 2030s – is sustainable. In fact, the current trajectory for offshore wind deployment is at odds with the UK's environmental ambitions and targets, including the delivery of Good Environmental Status, and without urgent transformation of associated policy and planning frameworks the feasibility of a timely and sustainable energy transition is in question.

Offshore wind can impact seabirds in a number of ways during construction and operation including collision, disturbance (i.e. noise and/or human activity that causes birds to move away), habitat loss, blocking important flight pathways (barrier effects) and loss of access to preferred feeding areas (displacement). Ultimately these impacts, individually or cumulatively via multiple windfarms and other activities and developments, contribute to increased mortality and reduced breeding success. The threat of cumulative impacts was acknowledged in the Offshore Wind Sector Deal and the Secretary of State's 2020 summer announcement on Hornsea 3. Plans to increase the scale of offshore wind deployment increases the risk to seabirds. We risk losing our globally significant breeding colonies to 'a thousand cuts' where no individual scheme is responsible but collectively the impact is devastating.

The role of offshore wind in the UK's energy transition is undeniable, however this technology must be delivered as part of a sustainable and coordinated suite of actions for climate and nature.

The current **planning and consenting regime for offshore wind** and other marine activities is not fit for purpose of delivering the government's 2030 ambition or the greater 2050 deployment targets recommended by the Committee on Climate change. It fails to take a strategic or spatial view of how energy infrastructure, fisheries and other marine activities can be accommodated alongside nature in increasingly busy waters. As our seas become more crowded with turbines, the pressure on our marine environment increases, preventing the recovery of fragile and degraded ecosystems. Without reform, irreversible wildlife losses are a real risk. The deployment of offshore wind and associated infrastructure must be led by **strategic government plans** which prioritise climate and nature, address environmental impacts at the outset and direct renewable infrastructure to the most suitable locations.

The RSPB considers that continued use of individual point-to-point, or radial, links may not be the best outcome for consumers in the future as generating capacity increases. Retaining this approach is also likely to increase pressure on coastal connection points.

Floating wind technology has the potential to reduce the conflict between turbines and wildlife if research and innovation drives development in less ecologically sensitive areas. To ensure that emerging renewables become part of the solution, a robust evidence base must urgently be gathered to inform commercial scale deployment in the right places. Similar caution must also be applied to tidal stream technology.

We recommend **innovation, collaboration** and appropriate consideration of geographical scales to consider across UK borders and the potential to maximise efficiencies through link up on an even larger scale, for example across the North Sea and in relation to the deployment of hub and spoke offshore wind technology.

In addition, we recommend the following:

Research and monitoring must be mobilised to provide a robust evidence base on how wildlife uses our seas and interacts with offshore wind. Standardised monitoring of development could be delivered through consenting mechanisms and new collaborative research programmes supported by the **Offshore Wind Evidence and Change** (OWEC) Programme. The RSPB strongly supports the ambition of OWEC and welcome the commitment of government and the sector to tackle barriers to sustainable deployment of offshore wind including cumulative impacts. However, we have serious concerns about the ability of this programme to inform and improve deployment in the 2020s, as was the goal of this initiative. Government leadership is urgently needed to ensure programmes like OWEC contribute to sustainable offshore wind deployment in this decade as well as ensuring actions leading up to 2030 transform the route to 2050 targets.

Investment must drive development in harmony with nature including Contracts for Difference auctions which prioritise projects causing least ecological harm and support to ensure research and innovation in emerging technologies.

Urgent action is needed to alleviate the combined pressures on our marine environment from unsustainable human activities to support the recovery and resilience of our wildlife and habitats and improve the ability of marine habitats to provide **nature-based solutions**.

The RSPB would welcome continued dialogue with National Grid and other key stakeholders and the opportunity to engage both directly and via panel representatives as part of continued efforts to address the challenges to sustainable offshore wind deployment and identify routes to expansion of offshore wind in harmony with nature.