Date: 22 October 2020
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Dear Sir or Madam

Offshore Coordination Project consultation

Natural England welcomes the opportunity to comment on the above consultation.

As the Government's advisor on the natural environment in England, our purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England advises on the environmental aspects of sustainable development and engages with the planning system as a statutory consultee for development plans, Environmental Impact Assessments, Strategic Environmental Assessment, Nationally Significant Infrastructure Projects and where planning applications are likely to impact upon our particular interests.

With the expansion of the offshore wind industry in the UK over the last 15 years there has been a step change in the amount of cabling activity to much higher numbers and lengths of inter-array and export cables needed to service these projects. In addition to this there has been an increase in the number of interconnector cables. This has necessarily led to interactions of cables with a wider range of substrates and associated habitats and species, and the need for differing installation techniques, successful or not. At the same time as this period of offshore wind development there has been a large increase in the number of Marine Protected Areas (MPAs) designated (from around 16% of inshore English waters designated in 2009 to 50% by 2020) leading to much greater interactions between cabling activities and designated sites. The limitations in availability of grid connection on land has led to cables from more than one project coming into the same or nearby areas leading to increased pressure on the habitats and species in those locations.

Natural England therefore supports any project that has the potential to reduce the number of cables and therefore the potential interactions with MPAs and sensitive habitats and species. We note from the cost benefit analysis that the reduction in offshore cables from the integrated approach is only expected to be 20%. While we support any reduction we would welcome further discussions about whether it's possible to make further reductions to ensure less damage to the offshore environment.

We have provided responses to selected questions in the following Annex.

If you have further questions regarding our response to this consultation, please contact Audrey Jones [redacted] Principal Adviser, Strategic Solutions or Alex Fawcett [redacted] Marine Industries Senior Specialist.

Yours faithfully

Alex Fawcett

Annex : Natural England response to Consultation questions

Cost-benefit Analysis Report

Q1. Do you agree with our assessment of the costs and benefits?
It would be useful to include the societal benefits of protecting the environment in the CBA, rather than just a reduction in impact from less cables and landing points in the integrated approach.

It is not clear if the Capex costs include the cost of protecting the environment through the provision of mitigation and compensation, these costs could potentially be significant, particularly under the status quo approach, so should be included.

Q2. Do you have any other evidence to support or challenge the assessment made?
Natural England can provide detail on the environmental sensitivity of areas of the seabed to cabling infrastructure, as well as protected landscapes, to further refine the model and ensure that the maximum reduction in environmental impacts is achieved.

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?
Natural England strongly supports the possible reduction in the number of assets and landing points, as we believe that this has the potential to be a positive impact on the environment. We recognise that the scale of the reduction depends on the timescale that a more collaborative and integrated approach can be achieved in, and hope that it can be achieved in the predicted timeframes in the CBA, and definitely for the R4 projects.

We recognise that further details are required to get a full understanding of the potential reduction in impacts to the environment from cabling and its associated infrastructure, the maximum opportunities could be achieved through the early engagement with Natural England to ensure that the most sensitive areas are avoided.

We welcome the idea that there is greater flexibility with the location of HVDC cables which will hopefully allow for the greater avoidance of environmentally sensitive areas, however the potential for EMF impacts on elasmobranchs and fish also need to be better understood while developing this technology.

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?
Natural England believes that there is value in assessing further approaches to co-ordination, as the current assessment may not reflect what is actually achievable. The models also largely assume that new OWF will be installed in areas where they have already been built, does this take account of developments in technology e.g. floating wind, which may open up new areas of the seabed, which could offer less opportunities for integration.

We also believe that further assessment of landing point information, as well as more detail on environmental sensitivities could provide a more realistic picture of what the cost/benefits could potentially be.

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?

The concept of regional CIONS would seem to open the door to considering the options for connections between a group of projects in an area rather than individually and this is welcomed. The option to reopen the CION process to progress group connection is also welcomed and has the potential to enable changes in relation to coordination to be brought forward in areas where connections have already been agreed therefore enabling any potential changes to be implemented sooner.

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

Natural England welcomes the proposed review of the CION process and the concept of regional CIONs. It would be helpful to provide the proposed 'enhanced visibility to developers of pre-defined areas of connection and capacity, enabling easier access' to other stakeholders too such as Natural England to enable us to provide upfront advice and consideration of the potential environmental impacts in relation to proposed connection points. From our perspective it is important that the CION process does not just allow 'economic and efficient approach to connections' but also sufficiently takes into account potential environmental impacts in order to also arrive at proposed connections and routes which are most beneficial to society in being both economic, efficient and least environmentally damaging.

Natural England would value more transparency in the CION process. We would like to see more information on what checks and balances there on the environmental information provided into process by developers and what weight this information is given. We advise that this could be achieved by altering the process to include the need for statutory consultation with relevant stakeholders, such as ourselves.

In addition is there an opportunity for the CION process to do more to encourage least environmentally damaging route and landfall, not just most cost effective. Is this where strategic consideration can be given to best landfall/ grid connection points from an environmental as well as cost perspective?