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National Grid ESO

BY EMAIL

Dear Sir/Madam

**The Wildlife Trusts response to the Offshore Coordination Project**

The Wildlife Trusts (TWT), with more than 800,000 members combined are the largest UK voluntary organisation movement dedicated to conserving the full range of the UK's habitats and species, whether they are in the countryside, in cities or at sea. TWT manages 2,300 reserves covering more than 90,000 hectares of land including coastal reserves. TWT stand up for wildlife, inspire people about the natural world and foster sustainable living.

TWT works extensively in offshore wind farm development. We work on offshore wind farm casework, taking a cradle to grave approach, and have places on project expert topic groups for marine mammals and benthic ecology. In addition to this, we also work at a policy and strategic level with organisations such as Defra, BEIS, The Crown Estate, Regulators, Statutory Nature Conservation Bodies and industry on ensuring minimal impact on the marine environment from large scale expansion of offshore wind to meet the 2050 targets.

TWT has been raising the need for a discussion on a coordinated approach to offshore wind farm cabling and welcome the opportunity to respond to this consultation, which can be found in Appendix A.

TWT would be more than happy to meet with National Grid to discuss our comments in more detail. In addition, now discussions have begun between National Grid ESO and Statutory Nature Conservation Bodies and eNGO on the environmental implications of offshore grid expansion, TWT offer the opportunity to coordinate regular engagement with these organisations to ensure expertise is available as future work progresses.

Yours faithfully

Lissa Batey  
Head of Marine Conservation

**Patron**

*HRH The Prince of Wales*

*KG, KT, GCB, OM, AK, CD,  
QSO, PC*

*Royal Society of Wildlife Trusts  
Registered Charity no. 207238*

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**Appendix A: TWT response to offshore coordination report**

## 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)

- ~~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?

Although we appreciate this report takes a high-level approach and focuses on the system risk barriers, the report must recognise the environmental barriers which both cable/grid operators and offshore wind farm developers will face without a change in approach in planning and placement of infrastructure. Without a new approach and careful planning for an integrated approach, there will be serious negative impacts on the marine environment and potential consenting barriers. It must be recognised that the environmental implications from all grid options, even integrated, are a risk to the implementation of any future ambitions.

Individual offshore wind farm developers are already seeing a consenting risk from cabling impacts. A high level summary of environmental barriers should be considered in Section 5 of the report.

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

No comment.

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

The report outlines how KPIs were defined. Although we agree with what is listed, other variables require consideration such as location of asset in relation to the sensitivity of the marine environment. For example,

there are numerous Marine Protected Areas (MPA) within all regions but especially within the Dogger Bank and Eastern regions which are already under considerable pressure from offshore wind in-combination with other activities such as fishing. The KPI scoring could be applied easily to the number and condition of MPAs within each region. We are happy to discuss this in more detail.

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

We agree that an integrated approach to an offshore grid network would reduce the amount of infrastructure requirements, which would reduce impacts on the environment. However, we raise that even with the reduced infrastructure requirements from an integrated approach, a substantial amount of infrastructure would still be required offshore. The technology used, including installation technology, requires careful planning to ensure that the right technology is place in the right location to avoid environmental damage.

We note that larger cables would be required to bring the amount of energy onshore to meet the 2050 targets. Again, larger cables would have a greater environmental impact. The development of any new grid technology needs to take account of environmental impacts at the earliest stage.

We agree with the report, in that an integrated approach will allow forward planning, which is currently lacking from the current point to point system. By forward planning, a strategic approach to managing and monitoring the impacts from the development of an integrated offshore network can be undertaken, which will reduce project level consenting risk.

We caution against planning an incremental growth in offshore grid coordination. We appreciate that technology will advance between now and 2050 and so flexibility is required for this aspect. However, it will be important to spatially allocate where a coordinated offshore network should be placed within this timeframe to reduce the risk to the marine environment and consenting risk. Discussions should take place with both Defra and the Marine Management Organisation on how this can be progressed.

In section 2.2 of the Report, it is highlighted that the project specific approach to deliver 10GW of offshore wind farm energy in the UK has been extraordinary successful. TWT must emphasise that from an environmental perspective, this is not the case. Through poor planning, offshore wind farm cabling structure has not only impeded the recovery of the marine environment but caused a decline in the condition of the marine environment. This highlights that careful planning of a coordinated approach is essential.

## Cost-benefit Analysis Report

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

Yes, although we think the assessment of marine environmental Impacts could be Improved with an additional KPI. In addition, the risk to the marine environment, even from a coordinated approach, has not be recognised. Please see our response to question 3 below.

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

It is important to recognise that the marine environment is already in decline due to impacts from offshore wind farm development including cabling infrastructure. Impacts include repeated disturbance and damage to the seabed from cable installation and long-term loss of seabed habitat from cable protection measures.

This, in-combination with other activities such as fishing, has caused a number of Marine Protected Areas to decline from favourable to unfavourable condition.

We recommend the following reports should be reviewed as part of the cost-benefit analysis to provide context in relation to the marine environmental impacts of large scale expansion of offshore wind and grid infrastructure. The Information in these reports must be considered in any future phases of work:

- [Natural England and JNCC, Advice on key sensitivities of habitats and Marine Protected Areas in English Waters to offshore wind farm cabling within Proposed Round 4 leasing areas](#)
- [The Crown Estate Cable Route Protocol](#)
- [Review of Cable Installation, Protection, Mitigation and Habitat Recoverability](#)

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?

We welcome that an integrated approach will reduce the number of landing points and length of cable reducing the environmental impact compared to the point to point approach. However, there has been no consideration of environmental sensitivity, of which there is a great deal within each region. We suggest a simple way to assess this is to include the number and condition of Marine Protected Areas within each region as a KPI.

We recommend that the cost benefit analysis report continues to clearly highlight that an integrated approach to grid/cabling will reduce environmental Impacts. However, the report should also recognise that the scale of infrastructure required, even with the integrated approach, will have environmental impacts if not carefully planned and managed. Potential impacts on the marine environment include:

- Loss and damage to seabed habitats which provide the habitat and food source for whole ecosystems
- As a result of the loss of habitat, the loss of forage species such as sandeel
- As a result of the loss of forage species, population decline of dolphins, whales, seals and seabirds
- Decline in the Marine Protected Area Network and the marine environment as a whole. The UK has both national and international obligations for a coherent and well managed network of Marine Protected Areas and a healthy and recovered marine environment more generally.
- Further release of carbon due to the loss in carbon storage from habitats and species in decline or lost in perpetuity. Healthy and restored marine habitats and species play a vital role in carbon storage as part of action to tackle climate change.

It must be recognised that the environmental implications from all grid options are a risk to the implementation of any future ambitions. It is essential that this area of work is taken seriously, and consideration of the environmental implications is integral to the next phase of work.

Within the Cost Benefit Analysis Report that the threats to the environment should be listed as has been done in the Social and Local Impacts section.

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.

No comment

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

Yes, please see our comment in response to question 2 of the Offshore Connections Review Report.

## 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?

Yes, TWT support the areas highlighted for improvement to allow the ability to coordinate projects. However, we emphasise the need for a sense of urgency to progress investigation into a coordinated approach to ensure that impacts on the marine environment and associated consenting risk are reduced.

In particular, TWT are support the following:

**1. Review the Connections and Infrastructure Options Note (CION) process to implement improvements that drive and encourage coordination.**

TWT support this as a short-term action. The CION process requires a greater amount of transparency and there is very little engagement with SNCBs and eNGOs on the selection of a grid connection which has the least environmental impact. We highlight the Cable Route Protocol which The Crown Estate has developed as mitigation for cabling impacts on European Sites which has resulted in improved dialogue by some developers on grid connection and cabling options. There is an opportunity to build upon this and create a best practice model. This may be in the form of a code. TWT is happy to offer expertise in the review of the COIN process and we also encourage engagement with SNCBs and the RSPB.

**2. Package or coordinate connection application offers with other processes such as seabed leasing rounds.**

TWT is supportive of this action and would encourage discussions with The Crown Estate to develop this as an opportunity for Round 4. This has the potential to reduce environmental and consenting risk for round 4 projects if planned in the correct way.

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

We suggest the following actions should be undertaken:

- We welcome that integrated offshore solutions could be available as early as 2025. It is detailed in the reports that from a practical point of view may not be possible. We recommend that despite this, integration from 2025 must not be discounted and that conversations must take place to discuss options. We suggest urgent progress in the implementation of this approach, including the review of existing connections provided to offshore wind farm projects which plan to build post-2025.
- We welcome the overview provided on offshore transmission technology. Moving forward, the environmental impacts of all technology types must be considered to ensure that the right technology is used which will have minimal environmental impacts.
- Environmental considerations must be included in the next phase of work using expertise from Statutory Nature Conservation Bodies (SNCBs) and eNGOs. Although a coordinated offshore

network will reduce impacts compared to a point to point approach, the amount of infrastructure required to bring 75GW onshore by 2050 will be immense and negative environmental impacts must be avoided at all costs. This will require an understanding of the potential impacts from an integrated offshore network on the environment, investment in installation techniques and technology that will reduce impacts and careful spatial planning to avoid sensitive areas. If environmental impacts are not taken into account at an early stage, the industry will face a serious consenting barrier.

- The environmental implications of any decommissioning or repowering of grid infrastructure must be considered in future studies.
- Although outside of the control of National Grid, the reports recognise that legislative and policy changes will be required to support a coordinated approach to offshore grid. This should be included within the short to medium term goals.

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.