

Mr Neil Copeland

Offshore.coordination@ofgen.gov.uk

By email only

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Our ref: NAT MAR MREN PLAN

Dear Sir

CONSULTATION RESPONSE – OFFSHORE ENERGY NETWORKS COORDINATION

NatureScot welcomes the opportunity to provide our input into the consideration of the coordination of future grid requirements to help meet our net zero targets through the development of renewables projects.

We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government's adviser on nature, our work seeks to inspire, enthuse and influence others to manage our natural resources sustainably.

Our marine space is increasingly pressurised with new and existing industries; Scotland's National Marine Plan overarching policy driver is a presumption in favour of sustainable development. The Sectoral Marine Plan for Offshore Wind and Scottish Offshore Wind Policy (published last year) indicate an increase in offshore wind of 10GW by 2030 in Scottish waters. In order for these developments to become operational, there is a reliance on the ability to connect to the grid network, which historically has relied on radial point-to-point connections. We agree on the need for a strategic consideration of the grid network and the potential to reduce the amount of new development, both on and offshore.

We welcome the consideration of the three work streams in this consultation:

- Early Opportunities
- Pathways to 2030
- Multipurpose Interconnectors (MPIs)

NatureScot is engaging with the ESO to help deliver the Pathways to 2030 – Holistic Network Design Review, and we have recently been contacted to engage with developers involved in the Early Opportunities work. We welcome this early engagement to be able to raise any environmental concerns and / or solutions at the earliest stage.

In Scottish waters, we have extensive experience of cable projects whether it be transmission and distribution cables between our islands and mainland, interconnectors to other parts of the UK / Europe or more recently export cables for renewable projects. Our key environmental considerations for these projects include:

- Biodiversity – the ability to minimise biodiversity loss, avoid key sensitive species and habitats inside and out of protected areas and to consider natural capital and nature based solutions;
- Landscape and Visual - to avoid adverse impacts to designated areas recognised for their landscape qualities (National Parks, National Scenic Areas, Wild Land areas), and to consider the visual aspects of new electricity transmission.
- To value people's connection with nature through place making, formal and informal recreation and recognising people's interactions with our land, coasts and seas.

The coordination of future activity will enable greater engagement in planning for and implementing a grid that is fit for purpose, helps us meet our net zero targets and helps reverse our biodiversity loss.

Our detailed comments on the three work streams are in the attached annex.

We look forward to continuing collaboration as this work goes forward. If you wish to follow up on any on these comments, please contact myself in the first instance.

Yours sincerely,

Erica Knott

Marine Sustainability Manager / Sustainable Coasts and Seas Team

[Redacted signature]

Annex

General

- We wish to see policy / legislative changes to reduce any barrier to enable coordination. We see coordination and collaboration as a means to reduce current, individual long distance connections and to find solutions that enable efficiency, reduce environmental impacts, and provide a robust network design.

Early Opportunities

NatureScot does not have the technical expertise to provide answers to the questions posed. However, we advise that we are seeking that new development is located in the best location and has minimum environmental impact through avoiding, reducing impacts and providing mitigation to any residual impacts. All of the options are likely to increase development activity onshore or offshore. From our experience to date, we are keen for developers to consider novel techniques - in conjunction to develop useful principles and to share good practice. Mention is made of cost benefit analysis, we encourage that in addition to CBA, the implementation of natural capital concepts - otherwise traditional and least cost options do not necessarily reflect impacts to the environment.

We welcome the opportunity to engage with developers involved in this Early Opportunities work stream with our advice in respect of any environmental considerations.

Pathway to 2030

We welcome the intention for this holistic network design to help facilitate the roll out of renewables to meet reduced CO2 targets. We support any strategic planning process to improve efficiencies and reduce environmental impacts. As indicated in the consultation document the basis of this holistic network design will be Round 4 and ScotWind – noting that the Sectoral Marine Plan (SMP) for Offshore Wind is likely to result in future further rounds in addition to ScotWind. We would also anticipate that tidal stream will re-emerge in this next decade and more recently Marine Scotland have launched a consultation on a SMP for Innovation and Targeted Oil and Gas Decarbonisation. We recommend that the generation mapping take full account of these other planned activities.

We are also aware that ScotWind leases are due to be announced in early 2022; however, a number of developers are already undertaking baseline surveys and impact assessment work to enable applications quite soon after lease award. It is therefore, unclear whether this process will complete in time, in which case sharing the lessons learned from the Early Opportunities work will be helpful, in case some developments need to consider this route in advance of the Holistic Network Design conclusion.

The SMP for Offshore Wind has identified 15 possible option areas for ScotWind leases - we recognise that some of these option areas are in locations offshore where onshore there is very limited grid capacity. We would advise given our experience of the Beaulieu – Denny upgrade and other new transmission onshore that, onshore and offshore planning needs to be undertaken

together. There will be a different set of environmental constraints and communities to consider onshore in comparison to an offshore / mixed network.

We welcome our early involvement with the ESO and other SNCBs. These meetings have enabled sharing of knowledge on evidence and information gaps to assist the early thinking on the Holistic Network Design.

We advise that this work could fall under the consideration of both Strategic Environmental Assessment and Habitats Regulations Appraisal under the definition of a Plan.

We also advise that the National Marine Plan for Scotland is about to undertake a review, It would be useful to keep in touch with this process given the potential for policy support in any revised Plan.

Finally, we recommend incorporating a further two aspects into this work:

- Consideration of EMF effects on marine species and habitats – currently we know little about the effects of EMF from differing cable types, locations and on species. There is an opportunity to undertake a strategic study to help reduce / eliminate the uncertainties that exist around EMF effects on species and mitigation methods.
- Consideration of potential cable laying design, protection measures, and future decommissioning.

Multi- Purpose Interconnectors

We welcome the intention to consider these and in particular the current barriers in legislation and ownership. Any option which can reduce the amount of overall cabling infrastructure - will also reduce environmental impacts overall. We support the two-pronged approach by BEIS and OFGEM in looking at the issues around the development of MPIs. There may be considerable interest in this across all transmission and distribution networks and developers trying to link into the network across the UK as well as more widely into European markets.