



Mary Walsh
Ofgem

BY EMAIL

Dear Mary

21 July 2022

Minded-to Decision and further consultation on Pathway to 2030

This letter summarises concerns The Wildlife Trusts (TWT) has with regard to Ofgem's minded to decision. This letter also summarises the solutions TWT proposes to allow the delivery of large-scale energy transmission infrastructure to meet 50GW by 2030 whilst allowing nature's recovery.

Also included within Appendix A is a proposal for cable corridors to allow secure transmission of energy offshore to onshore alongside the delivery of nature recovery highways.

Concerns with the minded to decision:

The minded to decision suggests that very late competition generator build option will deliver infrastructure to meet government ambitions and will deliver value for money. We suggest that this option will result in environmental risks and therefore consenting delays, risks and extra costs.

TWT have engaged extensively with offshore wind farm developments such as Hornsea Three, Norfolk Vanguard and Norfolk Boreas, which have all experienced consenting delays and risks due to the unresolved environment impacts related to transmission infrastructure. We fear the same will be the case with a late competition generator build option to deliver infrastructure to meet up to 50GW by 2030.

The Holistic Network Design (HND) has not identified any environmental solutions to reduce consenting risk. The identification of these measures, based on a generator build model, will now be left to the developers who do not have a framework in place to support a coordinated approach to develop appropriate environmental measures. Without this, we suggest that environmental measures will be developed too late which will not be fit for purpose. This has the potential to introduce delay and litigation risk. The British Energy Security Strategy has made it very clear that early and strategic environmental measures will be required to deliver government net zero ambitions.

Solutions:

1. Marine energy transmission corridors.

TWT suggest this is the key solution to reduce environmental and consenting risk and must urgently be investigated. Details can be found in Appendix A.

2. Requirement for developers to coordinate, identify environmental measures early and take account of any costs.

If the very late competition generator build option is progressed, we suggest clear contract commitments are required to ensure that developers coordinate and work together to identify environment measures at the earliest stage, working with statutory and non-statutory experts. Stakeholder engagement is essential for 2 important reasons; a) the delivery of the environmental measures may only be in the gift of government and b) stakeholder buy-in will be essential to reduce consenting risk. The measures must be accounted for at the competition stage to ensure a check and balance is in place to ensure appropriate funding is set aside to deliver the required environmental measures.

3. Plan level assessment and environmental measures for future iterations of the HND
Any future HND must implement strategic environmental assessments such as plan level HRA/MCZ assessments and an SEA. These are essential tools to assess impacts and identify measures to reduce environmental and consenting delays/risks.

I would be more than happy to discuss TWTs proposed solutions with you in more details.

Yours sincerely

A handwritten signature in cursive script that reads "Tania Davey".

Tania Davey
Marine Planning Manager

Appendix A: Marine energy transmission corridors

The current approach to the installation and maintenance of energy transmission cables can cause disturbance, damage and loss of marine seabed habitats. This will further cause the deterioration of Marine Protected Areas (MPAs), many of which are already in a poor, unfavourable condition.

Based on the scale of offshore transmission infrastructure expected in the next 30 years to distribute and bring renewable energy onshore, we predict that there will be large-scale damage and loss of habitats resulting in ecosystem scale consequences. The picture is stark; cumulatively with other activities we could see a loss of ecosystem functioning resulting in a loss of key food web species such as sandeel which will have a catastrophic impact on seabirds, porpoise, dolphin, whale and seal species.

Alongside this, nature's incredible ability to trap carbon safely to help tackle climate change will be at risk due to the scale of disturbance and loss of habitat. Trenching for cables will bring older, more carbon rich, layers to the surface and by resuspending sediments into the water column. This results in the release of stored carbon, which when bottom-towed dredging and trawling were examined has been estimated to cause emissions of several million tCO₂e/year in recent studies¹. Uncertainties around the contribution of cable laying to carbon emissions requires a precautionary approach to be taken as well as commitments to fund projects to build the evidence base.

We need to tackle the interlinked nature and climate crises together. It isn't enough to cut greenhouse gas emissions if the method of doing so destroys our natural environment. **The Wildlife Trusts propose that an alternative is available in the form of marine energy cable corridors to deliver safe and secure supply of energy to UK consumers while creating nature recovery highways.**

Within cable corridors, cables which are surface laid will be protected through an anchoring and fishing safety exclusion zones. Due to this safety protection, cable protection such as concrete matressing or rock armouring will not be required which will eliminate the need for difficult compensation normally required due to the loss of habitat from these structures. Cable corridors will not only allow for quicker consenting but will also reduced costs. And importantly there will be a twin benefit of creating nature recovery highways along cable corridor routes by reducing anthropogenic pressures in these areas which will allow natural recovery.

This measure needs to be urgently progressed to establish the legal and regulatory mechanisms required to ensure infrastructure delivery to meet 2030 targets.

¹ <https://post.parliament.uk/research-briefings/post-pn-0651/>