

Dear Cher-Rae Fairlie and Viljami Yli-Hemminki,

Natural England have taken the opportunity to comment on the above document as well as the *Additional draft Impact Assessment*. Some brief comments have been provided for your consideration.

As the Government's advisor on the natural environment, 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. It is noted that the application of this minded-to decision has been broadened to include all projects within scope of the HND and HNDFUE, including proposed floating wind projects in the Celtic Sea.

Revised Minded-to decision and further consultation on delivery models in Pathway to 2030

- It is noted that there were responses referred to the lack of consideration towards community and environmental risks. It is not clear whether these comments have now been addressed, especially considering the objectives of the OTNR and the aim to balance environmental, social and economic costs.
- It is noted why the full capacity of 4GW from Celtic Sea Floating offshore wind proposals is included in PT2030. It is understood that 1GW is included in HND, however it needs to be clearly communicated that 3GW of this total capacity is not anticipated to be connected until 2035.
- 'As with any project outside of the HND, developers will still be required to undertake environmental Habitat Regulations Appraisal (HRA) and to gain the necessary planning and consenting approvals'. Natural England have advised that more robust assessments (ie HRA) as part of the HND process would enable identification of suitable cable route options and eliminate those options which present greater risk. Additionally, it would also provide the detail required upfront to evidence alternative routes should the derogations be needed.

Additional draft Impact Assessment

- It is noted that the assessment highlights changes to the quantified costs and benefits estimated in the first draft impact assessment as well as the implications of these changes.
- '...objective of the OTNR is to ensure that the transmission connections for offshore wind generation are delivered in the most appropriate way, whilst considering the increased ambition for offshore wind to achieve net zero'. Natural England advise that it is important to ensure that in delivering net zero commitments, unnecessary damage is not inadvertently caused to valuable ecosystems contributing to biodiversity loss.

- Natural England welcomes the plans for a detailed network design offshore, that will take into account and address upfront the key environmental and cumulative impacts. However, as part of our engagement with NGESO and the HND, we advise that a better understanding is needed of the interface between HND and DND and how the recommendations of the HND apply to the DND. NE have asked how the DND is governed, and it would be useful to understand how the work undertaken at HND considering the options will be considered at DND.

Please get in touch should you require any further information or would like to discuss any comments provided. Thank you for the opportunity to respond to the consultation.