

**Laura Cork**

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**From:** Andrew Prior [Andrew.Prior@jncc.gov.uk]  
**Sent:** 05 September 2007 11:44  
**To:** Offshore Transmission  
**Subject:** Offshore transmission consultation response.

Dear Sir / Madam,

Thank you for the opportunity to respond to the consultation on offshore transmission.

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, the Countryside Council for Wales, Natural England and Scottish Natural Heritage. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

As a statutory nature conservation organisation JNCC is supportive of proposals which will promote the timely delivery of appropriately sited renewable energy schemes.

We have one main comment to make on the proposals; namely that greater clarity is required on how environmental and planning consents will be obtained for offshore transmission infrastructure.

Currently offshore developers are required to obtain consent for both wind farms and transmission infrastructure up to the point of onshore connection with the national grid. Such consent is obtained under s.36 Electricity Act and the Food and Environment Protection Act (FEPA).

The proposals appear to support the continuation of the existing arrangements (e.g. paras 3.6, 4.31 and 5.21). At paragraph 5.37 the transfer of relevant consents is contemplated.

However, we believe that there is some ambiguity in the proposals. For example at paragraph 3.45 the consultation document refers to OFTOs managing the licensing and consenting process. Paragraph 4.22 refers to the requirement for "some" consents to be in place. The risk matrix at Appendix 3 also envisages consenting risk to be an OFTO liability.

We believe that greater clarity is required in respect of environmental consenting in the proposals. In particular we believe that the proposals should make a clear and unequivocal commitment that cable routes from offshore renewable energy projects to terrestrial connection points should continue to be subject to full environmental impact assessment under the s.36 and FEPA procedures. Any OFTO should only be permitted to construct and operate offshore cable and transmission infrastructure in accordance with the terms of these consents. The alternative approach, the adoption of separate consenting approaches for cables and offshore wind farms, could give rise to the potential for increased adverse environmental impact or, in extreme cases, leave consented projects without the means of exporting electricity to connection points.

Should you require any further information on the above please contact Andrew Prior at JNCC (see contact details below)

Yours faithfully

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