



Historic England

Offshore Transmission Network Review
Department for Business, Energy and Industrial
Strategy
1 Victoria Street
London
SW1H 0ET

Correspondence by email only

23rd November 2021

Dear Sir/Madam,

Offshore Transmission Network Review: Enduring Regime and Multi-Purpose Interconnectors

The Historic Buildings and Monuments Commission for England, otherwise known as Historic England, is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). Our purpose is to improve people's lives by championing and protecting the historic environment and our vision is for a heritage that is valued, celebrated and shared by everyone. A historic environment that people connect with and learn from and that we are proud to pass on to future generations.

We understand that this consultation exercise, which commenced 28th September 2021, is associated with the UK government target to deliver 40GW of renewable electricity generation by 2030 and to achieve net zero emissions by 2050 which could require as much as 100GW of offshore wind infrastructure.

We appreciate the explanation provided to us that the present model for connecting each offshore wind farm development to the terrestrial electrical grid system requires attention in consideration of the expected scale of deployment in the next few years. We are therefore interested to understand the proposals for a more coordinated approach to offshore transmission.



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We add that incentivisation to reduce environmental impacts by installing fewer electricity export cables will need to consider different scales of impact inclusive of sensitive seabed sites of archaeological interest. We therefore appreciate that a more strategic approach should enable better consideration of environmental impact at an earlier stage in the (project planning) process.

To address these matters, we understand that the Offshore Transmission Network Review (OTNR) will take a more holistic approach to network design inclusive of Multi-Purpose Interconnectors (MPIs) and the benefits offered by combining market-to-market interconnection and direct connections to offshore windfarms. We also concur with the statement that through the statutory Environmental Impact Assessment process, at the individual project level that the scale of likely effects becomes known and the opportunities for avoidance, minimisation and mitigation can be applied in practice.

We offer the following response to the questions set out in the consultation document:

1. *We think that a more strategic approach to the planning and development of offshore wind is needed to achieve the Review's objectives. Do you agree? Please explain your answer.*

A strategic approach should help and we appreciate the matters that you have identified that require attention so that any 'strategic approach' might be realised. It seems that high profile matters that require attention in any such strategic approach is how to reconcile the scope for developers to choose the sites that they feel are best suited to offshore wind and the relationship between a 'strategic plan' and any formal requirement for Strategic Environmental Assessment (SEA).

- 2) *If you agree, do you have any views about the scope of the strategic plan? For example, should it cover generation or be limited to transmission?*

It would seem appropriate that focus is directed towards transmission.

- 3) *What governance arrangements would be appropriate for a strategic plan? For example, who should be the lead organisation, and what roles and responsibilities would other partner organisations have?*

It would seem appropriate that BEIS is the lead organisation and it would seem that as the lead organisation, BEIS should draw on experience gained from conducting SEA and adapt the process accordingly to produce a strategic plan which sets out roles and responsibilities between partner organisations, such as developers, The Crown Estate, the Marine Planning Authority and statutory consultees (i.e. non-Departmental public bodies).

- 4) *How should stakeholders be consulted during the development of a strategic plan?*
- A similar model to consultation as used for SEA would seem appropriate.

- 5) *What time period should be covered by a strategic plan and how frequently do you think it should be updated?*

Any time period should be harmonious with SEA cyclical review and marine plan monitoring and revision.



6) *We think that there is a need for a Holistic Network Design that plans offshore transmission for the long-term as an integrated part of a transmission network, Do you agree? Please explain your answer*

Yes, for the explanations provided in this consultation document.

7) *If you agree, do you think a Holistic Network Design should also include onshore transmission?*

Yes as far as is relevant to the scope of any strategic plan to be produced.

8) *Who do you think is best placed to undertake a Holistic Network Design? Please explain your answer.*

A key party is National Grid with involvement of other relevant and interested stakeholders. Consideration of stakeholders needs to take into account organisations (public and private) as much as individuals (e.g. terrestrial property owners).

9) *Which delivery model would provide the appropriate balance of incentives and cost savings, given the Review Assessment Criteria (Annex 4)? Please explain your answer*

We do not offer any comment regarding any offered 'delivery model'. It is our role to offer advice regarding the risk of encountering either the known or unknown historic environment (for definition, please see Section 2.6.6 of the UK Marine Policy Statement) and as such we will review detail as provided to us in any high-level or detailed design information. It is appreciated that early delivery of such information best supports provision of advice that can be used effectively to inform project delivery.

10) *At what stage should the detailed design and construction of transmission be conducted? Please be clear about which approach your comments relate to.*

In consideration of our formal role and responsibilities, the delivery of detailed design and construction information of transmission assets at an early stage to inform project planning and delivery is our preferred position and enables best value to be obtained from our advice and participation.

11) *Do you have any views on the relative merits of these high-level approaches?*

No further comment to offer at this stage.

12) *Does the current legal and regulatory framework, and Ofgem's options to regulate within that framework as described in the Ofgem consultation, provide an adequate enduring solution for the regulation of MPIs? If not, please indicate why not and what changes you think may be needed*

We note the detail provided regarding present absence of definition of, and provision for, a licence for MPIs in present legislation and we must defer to the relevant legal experts to address such matters. Furthermore, any such amendments to the regulatory regime as necessary to include MPI infrastructure should also ensure that full inclusion of consultation requirements are also secured.



13) *Do you have any views on the merit or necessity of defining a separate MPI asset class in UK legislation, or other legislative change? What might be the disadvantages of this approach?*

We defer to other relevant legal experts responsible for the regulation of such industrial infrastructure.

14) *What changes might be needed to the current UK regulatory framework to address regulatory developments in other jurisdictions?*

We defer to other relevant legal experts responsible for the regulation of such industrial infrastructure.

Yours faithfully,



Dr Christopher Pater
Head of Marine Planning

cc. Sarah Lewis (Senior Policy Advisor, Historic England)



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