

Amanda King
Energy Infrastructure Planning Team
Department for Business, Energy & Industrial Strategy
1 Victoria Street
London, SW1H 0ET

3rd November, 2017

Dear Ms King,

The Southern North Sea candidate Special Area of Conservation Call for Information

Energy UK and our members welcome the opportunity to respond to the Government's call for information regarding the Southern North Sea candidate Special Areas of Conservation (cSAC).

Energy UK is the trade association for the GB energy industry with a membership of over 90 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership encompasses the truly diverse nature of the UK's energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership.

Our members turn renewable energy sources as well as nuclear, gas and coal into electricity for over 26 million homes and every business in Britain. Over 619,000 people in every corner of the country rely on the sector for their jobs with many of our members providing lifelong employment as well as quality apprenticeships and training for those starting their careers. The energy industry adds £83bn to the British economy, equivalent to 5% of GDP, and pays over £6bn in tax annually to HMT.

In 2016 at 5.1GW of capacity offshore wind represented 5.4% of UK electricity generation and delivered a 7 million tonne reduction in carbon dioxide emissions¹. Furthermore, there is a construction pipeline of 8.5GW with an additional CfD Pot 2 auction scheduled for the spring of 2019. As a result, offshore wind represents a significant contribution to the UK's energy security, decarbonisation targets and crucially, wider industrial strategy, with a significant amount of this development situated within the Southern North Sea cSAC.

Additionally, we would like to highlight that Sizewell B (operational) and the proposed Sizewell C (under development) nuclear power stations are located at the southern end of the Southern North Sea cSAC. Energy UK expects that coastally located thermal power stations would be impacted by the cSAC in a similar manner to ports and harbours. Construction activities at these sites would undertake a detailed Habitats Risk Assessment (HRA) as part of the application to develop the site, and we expect that operations and developments at Sizewell will be sympathetic to species such as Harbour Porpoise.

The consultation confirms in Section 5.12 that 9 offshore windfarms will be included within the scope of the Review of Consents with all of these consented and are either about to, or have already,

¹ [Crown Estate Operational Wind Report, 2017](#)

commenced construction. The review of consents process, gives rise to the potential for consents to be modified or revoked. The retrospectivity of these potential changes poses a risk to major projects which are already operational as well as those going into construction with a lack of certainty as to whether there will be changes. This creates both significant uncertainty for our members and concern within the wider industry where stability is sought in order to give investors the confidence to make long term, high value investments in all types of electricity generation that form the energy mix required for security of supply in the UK.

To assist the industry, we would welcome clarity on the proposed noise modelling which will inform the HRA. This could be achieved via a workshop bringing together developers and stakeholders with the consultants undertaking the work to share the detail and provide the required transparency as to how they intend to undertake the acoustic modelling and interpretation as part of the HRA. We note the Offshore Wind Programme Board's offer to facilitate and support this workshop, where appropriate and possible.

Energy UK runs a Planning Sub-Committee, made up of our members, which discusses issues pertaining to planning and consents in both the terrestrial and marine environment. The Planning Sub-Committee is primed to engage with BEIS and offer support to the Offshore Wind Programme Board on this issue and any others whereby BEIS may wish to discuss relevant issues with industry.

A number of our members will be providing more detailed responses to this call for information and we would encourage the Department to consider these in light of Energy UK's submission.

Should you have any questions then please do not hesitate to get in touch.

Yours sincerely,

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