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Submitted via email  
marineplanning@scotland.gsi.gov.uk

Dear Sir/Madam,

## **Scotland's National Marine Plan Consultation Draft**

### **Consultation response by National Grid**

National Grid is pleased to have this opportunity to contribute to Marine Scotland's consultation on its intention to develop a National Marine Plan for the Scottish inshore and offshore waters.

In responding to the consultation document we have provided an overview of National Grid's operations for your information. We have responded to the questions posed and where references are made to the text we have referenced the page numbers used in the consultation document.

### **Introduction to National Grid**

National Grid is an international electricity and gas company and one of the largest investor-owned energy companies in the world. National Grid plays a vital role in delivering gas and electricity to many millions of people across Great Britain in an efficient, reliable and safe manner.

Through regulated subsidiary companies, National Grid owns the electricity transmission network in England and Wales, operates the electricity transmission system throughout Great Britain, owns and operates the gas transmission network throughout Great Britain and four of the eight gas distribution networks delivering gas to some 11 million homes and businesses.

National Grid's primary duties are to operate, maintain and develop its networks in an economic, efficient and co-ordinated way and to facilitate competition in the supply and generation of electricity and in the supply of gas. Pursuant to its licences, it is required to provide connection to and use of the transmission and distribution networks in a non-discriminatory and transparent way.

As an electricity transmission system licence holder National Grid also has a duty placed on it under Section 38 and Schedule 9 of the Electricity Act 1989 relating to the preservation of amenity. How National Grid meets this duty is set out in 'National Grid's commitments when undertaking works in the UK: Our stakeholder community and amenity policy'<sup>1</sup>. This statement, which is

<sup>1</sup> <http://www.nationalgrid.com/uk/LandandDevelopment/SC/Responsibilities/>

applicable to works on both the regulated electricity and gas transmission system, also incorporates commitments to stakeholder and community engagement.

Through regulated and non-regulated subsidiaries, National Grid also owns and maintains around 20 million domestic and commercial meters, and a number of electricity interconnectors between Great Britain and other European countries.

National Grid has a Liquefied Natural Gas (LNG) importation terminal at the Isle of Grain and the short-range LNG gas storage facilities in Great Britain.

National Grid Carbon Ltd is a non-regulated, independent subsidiary of National Grid, created to develop carbon dioxide transportation infrastructure in the UK. National Grid's expertise in building and running safe and effective pipeline networks could play a critical role in helping the UK to meet its obligation to cut carbon emissions by 20 per cent by 2020 through provision of CO<sub>2</sub> transport services to support deployment of Carbon Capture and Storage (CCS) technology.

In addition National Grid Offshore Ltd has been established as a bidder for subsea electricity transmission assets in the Offshore Transmission licensing arrangements.

National Grid is therefore well-placed to comment upon this consultation draft for national level marine planning, and welcomes the opportunity to be involved. We have not responded to all of the 40 questions, rather we have responded to relevant energy-related questions and have identified these and set them out below.

**Q1. Does the NMP appropriately guide management of Scotland's marine resources?**

Yes, the National Marine Plan sets out strategic planning policies to deliver Scotland's vision for a national marine plan. The key is particularly useful, showing how the policies align with and relate to the economic, social, marine ecosystem, and climate change objectives.

**Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?**

The overlap between marine plan areas and terrestrial plans is welcomed and should ensure that the planning areas are 'joined up' and provide a holistic approach to spatial planning, particularly for infrastructure projects and developments that are located in, or have effects in, both marine and terrestrial areas. This is clearly set out in the text beneath Policy GEN6.

In terms of continuity and co-operation between the marine and terrestrial planning areas, consideration should be given to the resource availabilities of local planning authorities in having to engage with new approaches, such as Marine Planning Partnerships, and a new set of stakeholders and statutory bodies during a period of continuing local government cutbacks.

**Q5. Are the objectives and policies in the NMP appropriate to ensure they further the achievement of sustainable development, including protection and, where appropriate, enhancement of the health of the sea?**

Yes, the policies appear to strike a balance between environmental, social and economic drivers and desired outcomes.

**Q8. Are the general policies in Chapter 4 appropriate to ensure an approach of sustainable development and use of the marine area? Are there alternative policies that you think**

**should be included? Are the policies on integration with other planning systems appropriate? A draft circular on the integration with terrestrial planning has also been published - would further guidance be useful?**

The general policies seem to be comprehensive and all-encompassing in terms of addressing sustainable development. Policy GEN6, relating to integration of marine and terrestrial development plans, makes it clear that marine and terrestrial spatial plans need to complement each other to support necessary infrastructure that straddles both planning regimes.

The proposed approach is straight forward and easy to follow. The approach reflects that of terrestrial plans in terms of setting overarching general policies and then topic-specific policies. This approach is logical in terms of 'scene-setting' and its consistency with terrestrial plans should be helpful to both marine and terrestrial plan-makers - in terms of the duty to co-operate - when developing their spatial plans.

The initial overview of integration of marine and terrestrial plans is useful, but a little more guidance would be useful. We note that a draft Circular has been published and we are responding to it.

Policy GEN7 refers to the need for compliance with statutory plans but also with the objectives and policies of relevant non-statutory plans where appropriate to do so. It would be helpful if examples could be provided of the types of non-statutory plan that are being referred to here as this could have implications for marine licence applications.

**Q9. Is the marine planning policy for landscape and seascape an appropriate approach?**

Policy GEN 14 states that *'marine planning and decision making authorities should ensure that development and use of the marine environment take seascape, landscape and visual impacts into account.'* Some marine developments will be visible from the shore and may have impacts on terrestrial receptors, so this is a sensible general policy that is consistent with the approach taken by terrestrial plans. Should regional marine plan areas wish to develop more specific landscape and seascape policies to reflect the character of the region then this would provide a good overarching policy.

**Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?**

We support the objective to seek reuse of decommissioned assets from the sea bed where practicable, and its inclusion in policy CCS1. Offshore pipelines (including their onshore elements) may provide useful means of transporting carbon dioxide as part of any future CCS network in Scotland.

The concept of re-use of existing pipeline infrastructure is supported, as a means of minimising environmental effects and reducing costs, although regard would need to be given to pipeline age, expected lifespan, condition, and the operating pressures and substances it was originally designed to convey when considering re-use of any existing infrastructure.

We also support the two CCS-specific policies, noting the consideration of future use of marine utility corridors as a means of identifying and sharing seabed space with other users.

Consideration should also be given to 'gateways' along the coast where infrastructure can approach and make landfall (e.g. electricity and communication cables; gas, oil and CCS pipelines). This has been successfully introduced in German and Dutch marine plans and it provides certainty and geographical focus for developers. Development corridors and gateways will need to be distributed around the coastline, to help to spread the associated benefits and impacts of infrastructure.

**Q24. Do you have any comments on Offshore Renewable Energy, Chapter 11?**

We support the objective to *'promote the development of an integrated terrestrial and marine electricity transmission grid in Scottish waters'*.

Under the heading 'Grid Provision' (page 87) we note the following statement: *'An east coast 1.8 GW HVDC link between Peterhead and Hawthorne Pit in Humberside (target for commissioning in 2018'* which was originally stated in the report *Our Electricity Transmission Network: A Vision For 2020*, by the Electricity Networks Strategy Group (March 2009).

The need for a potential east coast submarine HVDC link is currently being assessed by Scottish Hydro Electricity Transmission, Scottish Power Transmission, and National Grid Electricity Transmission. Connection points in the north east of Scotland, central Scotland, and north east England are being considered. It is currently expected that the link will be required post 2020.

With regard to paragraph on electromagnetic fields (EMF) (page 88) it should be noted that High Voltage Alternating Current (HVAC) cables produce EMFs, but that High Voltage Direct Current (HVDC) cables do not produce EMFs. HVDC cables only produce a magnetic effect and this is virtually cancelled out if the two HVDC cables are buried together in the same trench.

Policy Renewables 6 states that *'Where new grid connections are planned work should be undertaken with developers and Grid provider organisations within the Sectoral Marine Planning process to address environmental and socio-economic issues to help deliver reduced impacts and develop and improved regional strategy.'* This sounds like a useful process and we would welcome further details on how this might work in practice.

**Equality**

**Q38. Do you believe that the creation of a Scottish National Marine Plan discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?**

Yes  No

I hope that the above comments are useful and if you have any queries or require any clarification then please do not hesitate to contact me.

Yours faithfully,

**Hugh Smith**

**Consents Officer**