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By e-mail

Rebecca Dunlea

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Cc Oonagh Duffy

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Friday 2nd December 2016

Dear Rebecca,

EIRGRID Implementation Plan (IP) 2017-2022 - SEA Scoping Report

Natural Resources Wales are grateful for the opportunity to comment on the EIRGRID Implementation Plan (IP) 2017-2022 - SEA Scoping Report.

The statutory purpose of Natural Resources Wales (NRW) is set out under the Environment (Wales) Act 2016. In the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales, and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW are also advisors to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

Our comments on the SEA Scoping Report are as follows:

- 1. NRW welcomes and supports the strategic approach to the assessment of grid infrastructure implementation that the EIRGRID IP 2017 2022 SEA aims to achieve. We consider that a robust strategic assessment of environmental issues associated with the plan will help to reduce risks to the environment and minimise the consenting risks and uncertainties for project promoters by identifying environmental baselines, key constraints, sensitive receptors, potential impacts, alternatives and mitigation approaches.
- It is not clear from the scoping report what the 2017 2022 Plan intends as regards the EIRGRID east west interconnector to Wales, although as this connection is already built we have assumed that little in the way of change is planned. We would be grateful if this point could be confirmed.
- 3. If that is the case then further consideration of effects in Wales will not be required. However if any changes to this interconnection are planned then consideration will need to be given to the potential effects to Welsh waters and any land based infrastructure in Wales.

- 4. Any changes to parts of the grid that will mean that changes to the cabling and connection points in Wales are required will need to be assessed in the light of any potential sensitivities in Wales, and designed so as to minimise or avoid significant impacts.
- 5. We note that the report contains references to the Countryside Council for Wales and ask that any such references be amended to read Natural Resources Wales.

I hope that you find these comments helpful. If you would like to discuss any of the points we have raised, please contact Lucie Skates (lucie.skates@cyfoethnaturiolcymru.gov.uk) in the first instance.

Yours faithfully,

Cake Dois

Keith Davies

Manager Planning, Landscape, Energy and Climate Change