

Infrastructure 16, Marine Energy Wales

Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change,
Environment, and Infrastructure Committee**

Bil Seilwaith (Cymru) | Infrastructure (Wales) Bill

Ymateb gan Ynni Morol Cymru | Evidence from Marine Energy Wales



Written evidence submitted by Marine Energy Wales

Marine Energy Wales (MEW) thanks the Climate Change, Environment, and Infrastructure Committee for inviting us to submit written evidence relating to the Infrastructure (Wales) Bill. MEW is the industry representative body for the nascent floating offshore wind, wave, tidal stream and tidal range energy sectors in Wales, representing the needs and interests of 96 organisations active in the sector in Wales. As such our evidence included here is heavily informed by extensive day-to-day engagement with those looking to develop renewable energy projects in Welsh waters.

The consenting regime within Wales as it currently stands has been described as a significant pain point by many of the developers we have supported to date, with much of this referring specifically to the marine licencing process given the offshore nature of projects. MEW has been co-ordinating the Consenting Strategic Advisory Group (CSAG) since 2019, featuring developers, regulators, eNGOs, and academics to discuss approaches to ongoing consenting challenges in Welsh waters and develop best practices that can assist in the delivery of Welsh Government Policy for renewable energy. Additionally, we supported the end-to-end review of the marine licence process carried out by ICF on behalf of Welsh Government, ensuring that those with lived experience of the process fed into the review.

Some of the more prominent issues experienced by those in our membership that have been through the consenting process include: a lack of statutory timescales for consent impacting upon the commercial timescales of projects; a lack of effective pre-application guidance to inform exact requirements of submitted documents; uncertainty around evidence requirements for consenting innovative projects; and the unstreamlined and inconsistent nature of application submission and subsequent requests for additional information.

We believe that a proposed unified consenting process as set out by the Infrastructure (Wales) Bill has the potential to alleviate some of the concerns and challenges experienced by our membership and the wider offshore renewable energy industry. Additionally, this would be particularly beneficial for developers pursuing projects that span both the onshore and offshore environment as is the case with tidal range schemes and those with landfall substations.

We commend the aspiration to include a statutory timescale within the consent process. Incorporating this level of certainty will have a positive impact on project development. Currently a lack of such timescales can cause significant knock-on negative effects, not only hampering the development of individual projects and their bottom lines but also disincentivising industry investment and increasing the risk of a failure of reaching national renewable energy targets.

Many issues raised by our members relate to uncertainty throughout the consenting process, from a lack of clear guidance at the outset right through to additional evidence requirements requested after initial submission. We have also heard that many applications do not meet the expected standard of those reviewing applications. It appears that the Infrastructure (Wales) Bill should

address some of these challenges, with an emphasis on reducing complexity and improving the overall quality of applications with better early engagement.

Given that Welsh Government has legislative power for projects up to 350 MW, this bill will likely affect different marine energy technologies differently. As it is anticipated that commercial scale floating offshore wind projects will be of a capacity of 1 GW or more, and with the smaller 100 MW test & demonstration sites already going through the consent process, it is unlikely that this legislation will directly impact upon floating offshore wind projects. However, it could be quite key for the development of enabling infrastructure such as ports and grid.

Should the Infrastructure (Wales) Bill have the intended effect and address the problems outlined it could have a positive effect on the development of other marine energy technologies, therefore simplifying the development of commercial wave and tidal stream projects as these industries matures. Given the 350 MW upper limit this would also be beneficial to smaller scale tidal lagoon projects that are likely to be developed in advance of much larger ones.