



# Ossian Offshore Wind Farm Supporting Statement

## S35 Request

September 2024

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# 1 Project Background

## 1.1 Introduction

- 1.1.1 In January 2022, Ossian Offshore Wind Farm Limited (Ossian OWFL, the Applicant) was awarded an Option to Lease Agreement to develop an offshore wind farm within the E1 East Plan Option (PO) Area as part of the ScotWind Leasing Round. The Ossian Offshore Wind Farm Project (hereafter referred to as 'Ossian' or 'the Project') will, if completed, be one of the largest floating offshore wind farms globally, generating (on current projections of available generation technology) up to 3.6GW of renewable energy. The transmission infrastructure, delivering the renewable electricity, will travel from the Offshore Wind Farm Array in Scottish offshore waters through English offshore and inshore waters to onshore locations in England.
- 1.1.2 The Applicant is promoting Ossian as a joint venture between Scottish and Southern Energy Renewables Limited (SSER), Copenhagen Infrastructure Partners (CIP) and Marubeni Corporation.
- 1.1.3 On 23<sup>rd</sup> May 2024, following a request from the Applicant, the Secretary of State (SoS) for the Department of Energy Security and Net Zero (DESNZ) exercised their power under Section 35 of the Planning Act 2008 (PA 2008) to direct that the Onshore Transmission Infrastructure (the OnTI, described in section 1.3 below) required for Ossian is development of national significance and is to be treated as development for which development consent under the PA 2008 is required (the OnTI S35 Direction).
- 1.1.4 The request submitted to the SoS by the Applicant in respect of the OnTI S35 Direction did not include the Project's Offshore Transmission Infrastructure (the OfTI, defined in section 3.1.2 below). However, following further engagement and development of the Project as outlined in this Request, the Applicant now requests that the SoS exercises their power under S35 PA 2008 and directs that the OfTI is of national significance and is to be treated as development for which development consent is required.

## 1.2 The Applicant

- 1.2.1 SSER is a leading developer, owner, and operator of renewable energy across the UK and Ireland, with a portfolio consisting of around 4 GW of operational offshore wind, onshore and hydro sites. SSER has a secure 13 GW pipeline of renewable energy developments, including the largest offshore wind pipeline in the UK and Ireland at over 9 GW. SSER is leading the construction of the world's largest offshore wind farm project in Dogger Bank Wind Farm, which has a generating capacity of 3.6 GW. SSER is also promoting the consent applications for North Falls (with RWE) and Berwick Bank (as sole promoter) Offshore Wind Farms as well as a further extension to Dogger Bank Wind Farm with partners Equinor (Dogger Bank D).
- 1.2.2 Marubeni Corporation, a Japanese conglomerate, brings a wealth of sector experience of delivering floating offshore wind to the consortium, including leading



floating offshore wind demonstration projects in Japan with five different floating foundations.

- 1.2.3 Copenhagen Infrastructure Partners (CIP) is one of the largest fund managers in the world dedicated to the renewable energy sector, investing more than £1.5 bn in large scale renewable energy projects in the UK in the last decade, with future planned investments due to take this figure to between £5 bn and £10 bn.



## 1.3 The Ossian Offshore Wind Farm Project

- 1.3.1 Ossian will occupy 858 km<sup>2</sup> of seabed, located approximately 80 km (43 Nautical Miles) to the east of Aberdeenshire, generating enough renewable energy to power up to 6 million homes annually. One of the largest floating offshore wind farms in the world when constructed, it will play a critical part in meeting the UK and Scottish Governments' Net Zero targets. The Project will deliver enough renewable energy to offset up to 7.5 million tonnes of carbon emissions every year.<sup>1</sup>
- 1.3.2 The Project Array will be wholly located in Scottish offshore waters. Travelling from the Offshore Wind Farm Array, the power generated by Ossian will connect to the onshore grid network via a landfall in England. Section 3 provides further details of the Ossian transmission infrastructure.
- 1.3.3 The principal elements of the Project are:
- Offshore Wind Farm Array Located in Scottish offshore waters comprising: Wind Turbines installed on floating foundations, Offshore Substations, Offshore Transformer Modules and inter array cables;
  - Scottish Offshore Transmission Infrastructure (SOFTI) comprising: HVDC Transmission Cables in Cable Corridors, connecting from the Offshore Wind Farm Array to the limits of Scottish offshore waters and HVAC inter-connector cables from the Offshore Wind Farm Array to other Offshore Wind Farm projects as part of the coordinated offshore grid network;
  - Offshore Transmission Infrastructure (OfTI) comprising: HVDC Transmission Cables in a Cable Corridor, connecting from the SOFTI through English offshore waters (i.e., the English Renewable Energy Zone, or REZ) and inshore waters to Landfall on the coast of Lincolnshire, totalling a cable corridor of approximately 400km in English waters from offshore waters up to Mean High Water Springs (MHWS);
  - Onshore Transmission Infrastructure (OnTI) comprising: HVDC Transmission Cables in one approximately 15km Cable Corridor and one approximately 60km Cable Corridor, Landfall Works, up to 3 Converter Stations and HVAC Transmission Cables in Cable Corridors from the convertor station(s) to the National Grid Substation (all onshore in England).
- 1.3.4 The Project Array and SOFTI will be consented by way of a separate consenting regime, by the Scottish Ministers under s. 36 of the Electricity Act 1989 and by marine licences under the Marine and Coastal Access Act 2009.
- 1.3.5 The OnTI is the subject of the OnTI S35 Direction. For reference the OnTI S35 Direction is attached to this submission as Appendix 1.
- 1.3.6 The OfTI is the subject of this S35 Direction Request. The elements making up the OfTI are set out in section 3.1.2 and are referred to in this S35 Direction Request as the "Proposed Development". The Proposed Development is located wholly within

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<sup>1</sup> based on expected annual output against average 440 tonnes CO<sub>2</sub> per GWh for all non-renewable fuels



waters adjacent to England up to the seaward limits of the territorial sea and in a Renewable Energy Zone (and not in a Renewable Energy Zone over which the Scottish Ministers have functions).

- 1.3.7 Section 3 of this Direction Request sets out in more detail the Proposed Development over which the Applicant requests the Secretary of State exercises their power under S35 of the PA 2008 to direct as being of national significance and to be treated as development for which development consent is required.

## 2 Grid Connection

### 2.1 HNDFUE

- 2.1.1 Through the ongoing Offshore Transmission Network Review (OTNR) and National Grid Holistic Network Design Follow Up Exercise (HNDFUE) review, National Grid Electrical Systems Operator (ESO), in partnership with Ofgem and DESNZ, have developed an integrated approach for connecting future offshore wind farms into the UK Grid. The ESO has confirmed, through this process, that Ossian will be offered the following two onshore grid connections in the Lincolnshire Area:

- Lincolnshire Connection Node (LCN)
- Weston Marsh, Near Spalding (WM)

- 2.1.2 **Figure 1** shows the site of the Offshore Wind Farm Array and an indicative area, within which the offshore and onshore transmission infrastructure will be sited, connecting the Array to the two national grid locations LCN and WM. Details of the grid connection areas are also shown.

- 2.1.3 As part of a coordinated approach to designing the offshore grid, ESO require Ossian's transmission infrastructure to manage an additional 400MW of power and to balance the wider grid network through the provisions of inter-connectors between Ossian and other offshore wind farm projects.

- 2.1.4 To facilitate this critical role within the UK Grid, Ossian will require to design, consent, construct, and operate transmission infrastructure which can accommodate, on current projections, up to 4GW of power.

- 2.1.5 Accordingly, the Proposed Development to which this Direction Request relates will be capable of delivering, on current projections, up to 4GW of power in total, incorporating up to 3.6GW of power generated by the Project and up to 400MW of power for wider grid network purposes.

- 2.1.6 A detailed description of the Proposed Development to which this Direction Request relates is provided in section 3.



## 3 Description of the Proposed Development

### 3.1 Proposed Development Infrastructure

3.1.1 The Proposed Development forms an essential part of the overall Project without which the renewable power generated by the Ossian Array could not be connected to the National Grid and delivered to households and businesses.

3.1.2 The Proposed Development is anticipated to comprise:

#### **OfTI**

HVDC Transmission Cables in a Cable Corridor, connecting from the SOFTI through English offshore waters (i.e., the English Renewable Energy Zone, or REZ) and inshore waters to Landfall on the coast of Lincolnshire, totalling a cable corridor of approximately 400km, in the English REZ and English inshore waters up to Mean High Water Springs (MHWS).

3.1.3 It is anticipated that the OfTI may require associated development, including but not limited to temporary construction works between MHWS and Mean Low Water Springs (MLWS) within the intertidal area.

3.1.4 The OfTI would be required to deliver the currently projected maximum of 4GW of renewable power to the National Grid.

3.1.5 It is the Applicant's position that the OfTI, and the Project of which it forms part, are nationally significant and that the OfTI should be directed by the Secretary of State to be development for which development consent is required. For further details on national significance, please see section 4.2 of this Direction Request.

3.1.6 Accordingly, the Applicant requests that the Secretary of State exercises their power under S35 of the PA 2008 and gives a Direction in respect of the OfTI. References to the "Proposed Development" in this request therefore mean the OfTI.





## 4 The Planning Act 2008 (PA 2008)

### 4.1 Section 35 PA 2008

- 4.1.1 The Proposed Development and the Project of which it forms part are not a nationally significant infrastructure project within the scope of S14 PA 2008. However, it is the Applicant's position that the Proposed Development and the Project of which it forms part are each of national significance for the reasons set out below.
- 4.1.2 Under S35 (1) PA 2008, the Secretary of State may give a direction for development to be treated as development for which consent is required. This power is subject to the provisions of S35 and of S35ZA as set out in the following table which includes a description of how the Proposed Development complies with these provisions.

**Table 1: Provisions of S35 & S35ZA of the PA 2008**

S35 Provisions	Proposed Development
<p><b>2 (a)</b> the development is or forms part of —</p> <ul style="list-style-type: none"> <li>• a project (or proposed project) in the field of energy, transport, water, wastewater or waste, or</li> </ul>	<p>The Proposed Development is in the field of energy, and forms part of the Project, which is a project in the field of energy.</p>
<p><b>2 (b)</b> the development will (when completed) be wholly in one or more of the areas specified in subsection 3.</p> <p><b>(3)</b> These areas are-</p> <p><b>(a)</b> England or waters adjacent to England up to the seaward limits of the territorial sea;</p> <p><b>(b)</b> in the case of a project for the carrying out of works in the field of energy, a Renewable Energy Zone, except any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions.</p>	<p>The Proposed Development will be wholly in waters adjacent to England up to the seaward limits of the territorial sea and in the English Renewable Energy Zone (i.e. not any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions).</p>
<p><b>2 (c)</b> the Secretary of State thinks the project (or proposed project) is of national significance, either by itself or when considered with— (i) in a case within paragraph (a)(i), one or more other projects (or proposed projects) in the same field;</p>	<p>The Proposed Development and the Project of which it forms part is of national significance. In order to assist the Secretary of State in reaching a conclusion on this national significance aspect, section 4.2 sets out the reasons why the Proposed Development and the Project are nationally significant.</p>
S35ZA Provisions	Proposed Development
<p>The power in s. 35(1) to give a direction in a case within s.35(2)(a)(i) (projects in the field of energy etc) is exercisable only in response to a qualifying request if no application for a consent or authorisation mentioned in s. 33(1) of (2) has been</p>	<p>The Applicant can confirm that no application for consent or authorisation mentioned in S33(1) or (2) (e.g. planning permission) has been made by it in relation to the Proposed Development.</p>



made in relation to the development to which the request relates.	
<p><b>S.35ZA (11)</b> defines a ‘qualifying request’ as meaning a written request for a direction under S. 35(1) that:</p> <p>(a) specifies the development to which it relates, and</p> <p>(b) explains why the conditions in s.35(2)(a) and (b) are met in relation to the development</p>	<p>This S35 request represents a ‘qualifying request’ as it is made in writing and specifies the development to which it relates (the Proposed Development). Additionally, the requirements of S35(2)(a) and (b) are met, as explained above.</p>

## 4.2 Justification of National Significance

### Delivery of Renewable Energy at Significant Scale

- 4.2.1 The PA 2008 designates offshore wind farms with a capacity of more than 100 megawatts in English inshore or REZ waters as Nationally Significant Infrastructure Projects. Whilst the Project Array is not in English territorial waters or an English REZ, the power generated by the Project and adjacent projects and carried onshore to the National Grid at an English landfall will be, on current projections, up to 4GW. Without the construction of the Proposed Development, the renewable power generated by Ossian (and carried from adjacent projects, where required to balance the offshore grid system), cannot be delivered to the National Grid. Moreover, the Ossian Offshore Wind Farm Array would not be constructed in the absence of the Proposed Development.
- 4.2.2 Ossian will be one of the largest floating offshore wind farms in the world. Once operational, it will produce enough energy to power up to 6 million homes annually and will offset up to 7.5 million tonnes of carbon emissions in each year. Accordingly, Ossian will play a critical part in meeting the UK and Scottish Governments’ Net Zero targets.
- 4.2.3 As one of the first major floating offshore wind farms, Ossian will provide key early stimulus to the delivery of advanced floating technology at scale, providing the offshore wind market with confidence and a supply chain in floating foundation technology. Ossian therefore significantly supports the development of the floating wind farm market, helping lay the foundations for future expansion of floating wind farms within previously discounted areas of the UK’s oceans.
- 4.2.4 At some 400km in length the Proposed Development will be one of the longest domestic subsea connections in the North Sea and is essential for the delivery of the renewable energy generated by the Ossian Array to the OnTI.
- 4.2.5 The Proposed Development will connect to the OnTI which was recently directed as a Nationally Significant Infrastructure Project pursuant to the OnTI S35 Direction. Without the Proposed Development, the OnTI would not be progressed.



## Meeting Climate Change Targets

- 4.2.6 The Climate Change Act 2008 established a binding goal for the UK to decrease its greenhouse gas emissions by 80% by 2050, compared to 1990 levels. This target was later amended to a 100% reduction by 2050 through The Climate Change Act 2008 (2050 Target Amendment) Order 2019. The Committee on Climate Change (CCC) introduced the sixth carbon budget in April 2021, spanning from 2033 to 2037, requiring a 78% reduction in emissions from 1990 to 2035.
- 4.2.7 In 2019, the UK Parliament declared a climate emergency and urged the reduction of carbon dioxide emissions. Measures proposed by the UK Government to address climate change include phasing out all coal plants, reducing gas plants, and increasing the use of renewable energy such as wind power (onshore and offshore), solar, hydro, and wave power.
- 4.2.8 The Ten Point Plan for a Green Industrial Revolution (published by the Department for Business, Energy and Industrial Strategy, now the Department for Energy Security and Net Zero, in 2020) seeks to advance offshore wind, aiming to produce 40GW of offshore wind in the UK by 2030, including 1GW of innovative floating offshore wind. The Ten Point Plan also goes on to state that “the UK is home to the world’s first two floating offshore windfarms and by 2030 we intend to have scaled this twelvefold”.
- 4.2.9 The British Energy Security Strategy (BESS) (UK Government, 2022) has further reinforced this commitment by aspiring to deliver up to 50GW of offshore wind by 2030 which notably includes a target of 5GW to be provided from floating offshore wind.
- 4.2.10 Ossian will make a substantial contribution to achieving the national climate change targets and policy commitments. Delivering on current projections 3.6GW to the grid of floating wind (and an additional 400MW from adjacent projects and wider grid network) represents a significant addition to the UK’s renewable wind resource and in terms of floating wind would provide 72% of the 5GW target.

## Energy Security and Grid Stability

- 4.2.11 The Energy Act 2023 seeks to ensure that the UK produces sufficient energy to reduce reliance on imported energy. The Project, including the Proposed Development, can provide a substantial and significant contribution to providing energy independence for the UK and in a sustainable manner. The Project including the Proposed Development will also contribute to reduced energy costs through improving domestic supply. This will result in less reliance being placed on importing energy and reduced exposure of UK customers to fluctuating energy import costs.
- 4.2.12 The critical importance of the Project transmission assets of which the Proposed Development forms part is highlighted through the HNDPUE process whereby ESO placed a requirement upon Ossian to accommodate an additional 400MW via connections with neighbouring windfarms. This will help balance the distribution of power flows and provide greater network stability in the wider public interest.
- 4.2.13 With this wider coordination role, the importance of those transmission assets including the Proposed Development within the overall UK offshore grid network is clear.



- 4.2.14 The transmission assets including the Proposed Development facilitate renewable energy generation; they provide energy security and contribute to network stability, significantly contributing to the UK Government's climate and net zero targets.

### Relevance of National Policy Statements

- 4.2.15 A new suite of Energy National Policy Statements (NPS) was designated and came into force in January 2024. The Energy NPS (EN-1 to EN-5) give further policy support to directing that the Proposed Development and the Project be treated as of national significance.
- 4.2.16 **NPS EN-1** states that it, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under s.35. NPS EN-1 would therefore, if the Proposed Development is directed into the PA 2008 regime, apply to the determination of the Proposed Development.
- 4.2.17 **NPS EN-1** establishes the need to increase electricity generation capacity to meet the UK's legally mandated targets for reducing greenhouse gas emissions. It identifies the urgent need to achieve emissions reductions of at least 100% by 2050, compared to 1990 levels. The demand for new electricity generation capacity to fulfill this goal is reinforced within the NPS, encompassing both offshore wind farms and the necessary transmission assets to connect them to the National Grid. The Government has committed to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels. The NPS states that according to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand (see NPS EN-1 3.3.57). NPS EN-1 further sets out the needs case and highlights that nationally significant low carbon infrastructure is considered as a Critical National Priority (CNP). CNP is defined to include energy infrastructure directed into the NSIP regime under S35 PA 2008 and which fits within the normal definition of "low carbon" (which the Proposed Development, carrying renewable energy, would clearly meet). The relevance of NPS EN-1 to the Proposed Development is therefore evident.
- 4.2.18 **NPS EN-3** states that it will apply to offshore transmission infrastructure projects in English waters which are directed into the NSIP regime under S35 of the Planning Act 2008. The Applicant therefore requests that NPS EN-3 is explicitly directed to apply to the Proposed Development as part of the Direction.
- 4.2.19 **NPS EN-3** goes on to state that the government's expectation that offshore wind will play a significant role in meeting demand and decarbonising the energy system. It confirms the Government's ambitious target of deploying up to 50GW of offshore wind capacity (including up to 5GW of floating wind) by 2030, with an expectation that a considerably larger installed offshore capacity will be required beyond this to achieve net-zero emissions by 2050.
- 4.2.20 **NPS EN-5** states that it will apply to electricity networks infrastructure of any type in circumstances where the Secretary of State gives a direction under s.35 of PA 2008 that development should be treated as an NSIP and requires a DCO.
- 4.2.21 As referred to in NPS EN-1, Section 2.12.7 of NPS EN-5 further establishes that CNP infrastructure includes electricity grid infrastructure and associated infrastructure. This NPS sets out that this does not have to be associated with a specific generation technology, as all new grid projects will contribute towards greater efficiency in



constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. The NPS outlines considerations for electricity network infrastructure, encompassing siting and design aspects. In paragraph 2.12.8 it sets out comments on the consenting process for electricity networks, acknowledging that “as part of the transition to a more coordinated approach, it is anticipated that some proposals for transmission may be consented separately to those for the windfarm (array) application”. “For this to occur, an applicant will need to make a request to the Secretary of State. The Secretary of State would then decide whether to grant a direction under Section 35 of the Planning Act 2008” (see paragraph 2.12.9). Overall, NPS-EN5 supports the critical need for CNP networks infrastructure such as the Proposed Development in delivering low carbon infrastructure.

4.2.22 In summary, the Proposed Development has strong policy support from the applicable NPSs. As supported by the clear statements in the NPSs, it is the Applicant’s view that Energy NPS EN-1, EN-3 and EN-5 should have effect in relation to the Proposed Development and that this should be stated by the Secretary of State in the Direction.

### **Consistency with other projects of national significance**

4.2.23 Ossian notes the following analogous energy projects have been directed into the PA 2008 regime by a S35 Direction (the distances referenced are approximate and are estimated based on the varied level of the information available and the differing stages of project development):

- Aquind (2GW / 20km Transmission Cable Onshore / 47km Transmission Cable Offshore)
- Nautilus (1.4GW / 7km Transmission Cable Onshore / 200km Transmission Cable Offshore )
- SeaLink (1.8GW / 15km Transmission Cable Onshore / 130km Transmission Cable Offshore)
- LionLink (1.8GW / 10km Transmission Cable Onshore / 170km Transmission Cable Offshore)
- Triton Knoll Electrical System (0.9GW / 45km Transmission Cable Onshore) / 23km Transmission Cable Offshore)
- Morgan and Morecome Offshore Wind Farms Transmission Assets (1.5GW / 155km Transmission Cable Offshore / 20km Transmission Cable Onshore ) / ( 0.48GW / 70km Transmission Cable Offshore /20km Transmission Cable Onshore )
- Eastern Green Link 3 (2GW /100km Transmission Cable Onshore / 575km Transmission Cable Offshore)
- Eastern Green Link 4 (2GW /100km Transmission Cable Onshore 525km Transmission Cable Offshore)
- Ossian Onshore Transmission Infrastructure (The OnTI) 60km and 15km Onshore Transmission Cable



- 4.2.24 The above projects predominantly comprise of HVDC transmission cables in substantial corridors connecting into converter stations with final connections into the National Grid.
- 4.2.25 Compared to the examples referenced above, the Project including the Proposed Development will deliver substantially more power to the UK Grid and mostly over a greater distance. As stated above, the Project including the Proposed Development will deliver up to 4GW of renewable power to the National Grid based on current grid designs.
- 4.2.26 This context further supports the view that the Proposed Development, and the Project of which it forms part, are of national significance, and that the Proposed Development would be most appropriately considered under the PA 2008 regime.

### **Coordination**

- 4.2.27 The Applicant is aware of a number of other NSIP projects, including other projects directed into the PA 2008 regime via a S35 direction, requiring connections into the Lincolnshire area, including interconnector projects which have identified similar offshore transmission corridors, and which may present opportunities for potential coordination and collaboration of the OfTI.
- 4.2.28 Alignment in consenting approaches with other transmission infrastructure projects offers the greatest prospects for the consideration of offshore and onshore coordination.
- 4.2.29 There are benefits in ensuring a consistent approach is taken across all the similar energy infrastructure projects in the region. For example there are benefits for stakeholders and consultees including the MMO and the onshore local planning authorities if a consistent consenting approach is taken for several projects within the same area which follow the same engagement process.
- 4.2.30 The potential collaboration and coordination requirements with other projects in the region further supports the Proposed Development being directed into the PA 2008 regime.

### **Streamlining Consents**

- 4.2.31 The potential to streamline consenting regimes would help to reduce the administrative burden on consultees and stakeholders including the MMO and local planning authorities whilst reducing the risks of delay and inconsistency in decision making for the Applicant, all of which is consistent with the urgent need for more critical national priority electricity infrastructure as identified in the Energy NPSs.
- 4.2.32 The granting of this S35 request would allow (although would not require) the applicant to bring the OfTI forward in the same single DCO application as one or both of the OnTI. This opportunity would reduce the number of overall consents required and simplify the consenting process to cover the wider elements of the Project.
- 4.2.33 In the absence of a S35 Direction, the Proposed Development would require to be consented under the Marine Licence regime. Consenting the Proposed Development under the same DCO regime as the OnTI, offers the opportunity to reduce the number of consents required for the Project, consolidate varying timescales of determination, and would result in a simplified consenting process. In the event the OfTI and OnTI



are brought forward under separate DCO applications, there are still efficiencies to be gained in terms of the same consultees and stakeholders being familiar with the Project overall in the context of the DCO process and the DCO process itself.

- 4.2.34 Separate consenting processes would involve different consultation and administrative processes; could lead to inconsistencies in decision-making; and potential delays resulting in additional costs, risks and added complexity to the consenting process. Together, these risks associated with a disparate and fragmented approach could affect the overall viability of the Project including the Proposed Development.
- 4.2.35 The PA 2008 was established to address these matters by facilitating a streamlined consent process for strategically important infrastructure which can then be assessed against appropriate national level policy.

### **Costs / Employment**

- 4.2.36 Ossian will deliver direct and indirect employment opportunities to the area through its construction and operation phases, delivering much needed investment and secure jobs for the UK. Current studies estimate that Ossian is expected to result in £4.0 billion worth of contracts in the UK, these are expected to generate substantial economic activity and employment, particularly associated with the manufacture of floating foundations.



## 5 Summary

- 5.1.1 A direction under S35 PA 2008 is sought for the Proposed Development (as defined in section 3.1.6 of this Direction Request). The Proposed Development meets the legal tests under S35 PA 2008 and there is strong policy support for directing the Proposed Development into the PA 2008 regime.
- 5.1.2 The Proposed Development forms part of the Ossian Offshore Wind Farm Project, a proposed 3.6GW floating turbine wind farm project located in Scottish offshore waters. Without the Proposed Development the Ossian Array would not be constructed. The Proposed Development will therefore enable the clean renewable energy generated by the Ossian Array to be delivered to the grid and facilitate the management of an addition 400MW of power to balance the wider grid network. The Proposed Development, and the Project of which it forms part, are nationally significant for the reasons set out in detail above.
- 5.1.3 In terms of S35 (2) PA 2008, the Proposed Development is in the field of energy and will be wholly within waters adjacent to England up to the seaward limits of the territorial sea and in the English Renewable Energy Zone (i.e. not any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions).
- 5.1.4 The Proposed Development is Critical National Priority infrastructure (CNP) as set out in the Energy National Policy Statements (NPSs). It will support the delivery of significant renewable energy and is urgently needed to help meet the UK's legally binding decarbonisation targets, as well as other policies specific to floating offshore wind, security of supply and network stability. Directing that the Proposed Development should be development for which development consent is required recognises its national significance and rightly directs that the NPSs shall apply to applications for the Proposed Development in the consents process.
- 5.1.5 By directing the Proposed Development into the PA 2008 regime, stakeholders and consultees will benefit from a streamlined consenting process with certainty of timescales. This will reduce overlapping administrative burdens for participants in the consents process and is consistent with similar projects that have recently been granted a S35 Direction by the Secretary of State, including the OnTI forming part of the Project.
- 5.1.6 In light of the legal tests being met and the strong policy support, it is appropriate to designate the Proposed Development as development for which development consent is required under S35 PA 2008.







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