



Llywodraeth Cymru
Welsh Government



Marine Planning Technical Statement Subsea Cabling – Sector Safeguarding

June 2023



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Introduction

The Welsh National Marine Plan ([WNMP](#)), provides a statutory policy framework to help guide decision making for the sustainable development of our seas. It sets out the Welsh Government’s vision and objectives for the Welsh marine plan area and policies to support their achievement. The Plan is supported by supplementary [Implementation Guidance](#) providing further detail on WNMP policies to help ensure their effective and consistent implementation.

The WNMP includes sector supporting and safeguarding policies for certain sectors which use Welsh seas. Supporting policies support the sustainable development of a sector. Safeguarding policies protect sector interests from inappropriate impacts from other activities.

Purpose of this Marine Planning Technical Statement

This Marine Planning Technical Statement is intended to support the effective and consistent implementation of WNMP safeguarding policy for Subsea Cabling. It should be read alongside the WNMP and the WNMP Implementation Guidance. Where there may be uncertainty over the requirements or implementation of the WNMP or any of its policies, decision makers should refer to the WNMP for the definitive policy wording and intent.

This Technical Statement should be used by parties involved in decision making with the potential to affect the marine plan area, for example:

- Project applicants.
- Public authority decision makers including marine and terrestrial planning authorities and regulators.
- Other users of the marine plan area.

This Technical Statement also provides context for all marine plan area users to understand the location of existing subsea cables, their landfall sites, and the associated land-based infrastructure, which are safeguarded through WNMP policy. It sits alongside other non-statutory and plan-related policy, guidance and evidence, supporting marine planning for Wales, and may be updated periodically.

Subsea Cabling

The WNMP recognises subsea cabling as crucial infrastructure upon which our energy security and telecommunications networks are dependent. Subsea cables are the backbone of the world's power, information and international telecommunications infrastructure, and socially and economically crucial to the UK. Submarine telecommunication cables carry over 97% of the world's international traffic including telephone, internet and data, as well as many services for the UK's local communities, major utilities and industries. The transatlantic cables landing in the UK carry more than 70% of Europe's transatlantic internet traffic.

The WNMP recognises that the achievement of net zero energy targets and the associated expansion of offshore renewable energy technologies require sufficient cabling and associated infrastructure. This is needed to transport electricity from offshore facilities and to share energy between countries in order to facilitate improved supply/demand timelines. The WNMP also recognises that widespread access to affordable, secure telecommunications infrastructure is important to society and that international telecommunications connectivity relies almost entirely on the subsea networks within UK waters. Whilst at present there are relatively few telecommunication subsea cables in the Plan area, the number is expected to increase to accommodate the needs for growth in data communication.

Safeguarding Policy SAF_01

Safeguarding for the Subsea Cabling sector is provided through WNMP Policy SAF_01a, which relates to existing infrastructure.

Policy SAF_01a recognises the importance of providing security for ongoing operations and investments. It is designed to ensure that existing activities are clearly and systematically taken into account in marine decision making and consenting of any new proposals with potential to adversely impact upon them.

In terms of the Subsea Cabling sector, Policy SAF_01a safeguards subsea cables, their landfall sites and the associated land-based infrastructure which will be the subject of local authority planning permission.

Policy SAF_01a recognises that, in some cases, new proposals may have potential to result in significant adverse impact(s) upon existing infrastructure, including subsea cabling. In such instances, the policy establishes a hierarchy requiring proposals to demonstrate how they will avoid, minimise or mitigate these compatibility issues.

Determining 'significance' is an important aspect of the safeguarding policy for subsea cabling. Given the critical role played by subsea cabling in supporting national power and telecommunications infrastructure, any proposals that have the potential to either damage the cabling itself, or to impact on the ability of operators to appropriately operate and maintain the cabling, may be considered by the decision maker to have a significant impact.

Policy SAF_01a also recognises that, in rare and exceptional cases, significant adverse impact(s) upon established infrastructure may be unavoidable. In such instances, developers will be required, when seeking authorisation for their proposed project, to submit a clear and convincing case of exceptional circumstances to justify proceeding with their proposals. Importantly, submission of a case for proceeding does not

mean that a proposal will be supported. It is at the discretion of the decision maker, when making a decision, to weigh up any case for proceeding against the potential adverse impacts on the safeguarded infrastructure. In the case of subsea cabling, it is recognised that such cases are highly unlikely to be supported in practice, given the critical role of subsea cables in supporting national power and telecommunications infrastructure.

SAF_01: Safeguarding existing activity

a. Proposals likely to have significant adverse impacts upon an established activity covered by a formal application or authorisation must demonstrate how they will address compatibility issues with that activity.

Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for the proposal to progress under exceptional circumstances.

Under SAF 01 a, compatibility should be demonstrated through, in order of preference:

- Avoiding significant adverse impacts on those activities, and/or
- Minimising significant adverse impacts where these cannot be avoided; and/or
- Mitigating significant adverse impacts where they cannot be minimised.

Subsea Cabling safeguarding: Policy SAF_01a

Policy SAF_01a applies to all proposals from all sectors (including new Subsea Cabling sector proposals) with the potential to impact upon **existing and planned subsea cables and cable landfall sites where a consent, authorisation or lease has been granted or formally applied for.** “Formally applied for” means, for those cables that require a consent, when a marine licence application has been accepted as ‘duly made’ by NRW or the MMO. The Policy applies to cable landfall sites and all cable routes within the inshore and offshore regions of the Plan area, including cable routes which pass through the Plan area but make landfall in neighbouring marine plan areas.

Cables are fixed installations and once laid on or buried under the seabed may interact with other activities that make contact with the seabed. Such cabling is usually buried where appropriate, or can be covered with external protection in order to both protect the cables themselves and to reduce the risk of adverse interaction with other sea users. Various national and international law exists in order to protect cables from breakage or injury (damage) and it is an offence in UK and international legislation to damage a cable wilfully or through culpable negligence. Additionally, the International Cable Protection Committee (ICPC) has developed a number of [recommendations](#) setting out best practice for installing and repairing cables to aid cable owners and other seabed users in promoting the highest goals of reliability and safety in the submarine cable environment.

The primary effect of Policy SAF_01a is to safeguard subsea cabling from significant adverse impact from new development. New development by other sectors, as well as within the cabling industry itself, increases the risk of damage to subsea cables of all types. Physical interactions involving force can damage both the cable and/or contact mechanism, causing economic loss to the operators of both activities, and may risk human safety. Damage to cables is expensive to repair and can cause significant disruption to power and telecommunication distribution. It is, therefore, vitally important that established cable infrastructure is adequately safeguarded.

While the primary focus of Policy SAF_01a relates to managing impacts from new development, it is recognised that cable damage often arises from existing mobile marine activities, such as vessel anchoring. As set out in “[MGN 661 \(M+F\) Navigation – safe and responsible anchoring and fishing practices](#)”, vessel operators should take special care when anchoring, fishing, dredging or engaging in underwater operations near areas where these cables may exist or have been reported to exist. Proposals for new development should also consider and address risks to subsea cabling infrastructure arising from potential displacement of existing mobile activities.

The main sector interactions for cabling infrastructure are with:

- **Fishing activity:** the main effects of cable laying on commercial fishing activity are associated with the need for bottom contact fishing methods to avoid installed cables, which may result in restrictions on access to fishing grounds or a need to adjust fishing practices to avoid snagging cables. The risk is small in Wales, where the majority of the fishing fleet are small vessels which do not use dredges or other towed fishing gears. However, larger vessels using towed gears operate beyond 6nm (especially for scallop) in areas where cables are known to be present.

- **Aggregate dredging:** current activity is not coincident with cable routes, although this may change in the future. Future aggregates licensing decisions may therefore need to take account of existing cable locations. The European Subsea Cables Association (ESCA) and the British Marine Aggregate Producers Association (BMAPA) have produced “[Marine Aggregate Extraction Proximity Guidelines](#)”.
- **Offshore oil and gas and other pipeline activities:** the Welsh Government’s policy is to avoid the continued extraction of fossil fuels in intertidal areas and estuaries and coastal inlet waters falling within the Welsh onshore licence area. However, licensing of offshore oil and gas activity beyond these limits is reserved to the UK Government. Such offshore oil and gas activity has previously focused on areas off the Mid Wales and North Wales coasts, where cabling is known to exist. In compliance with Policy SAF_01a, any future offshore oil and gas licensing decisions will need to take account of cable locations and any buffer zones. This is also the case with other pipeline activities, such as waste water pipes, which are mainly inshore.
- **Vessel anchoring** is one of the primary causes of damage to cables and should be considered in cable routing and burial assessments for proposed cables projects.

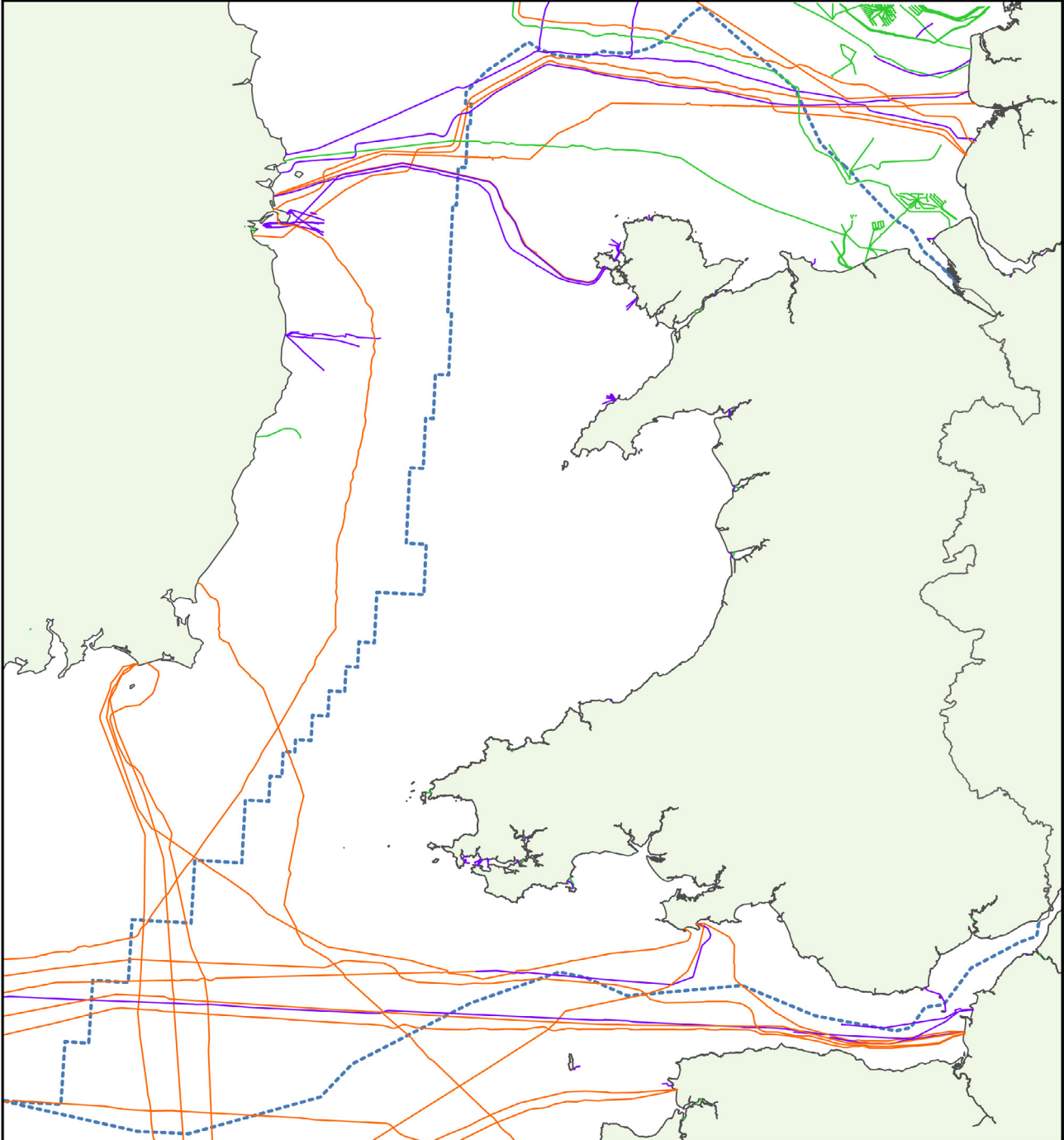
While various national and international law exists in order to protect cables from breakage or injury (damage), there is no provision for statutory exclusion zones around cables. Successful risk management therefore depends on putting in place mechanisms to safeguard cables and promote coexistence with other potentially damaging activities. Developers and decision makers will also need to ensure sufficient space is allowed for safe access to, and repair of installed cables; this usually equates to a buffer on either side of the cable of three times the water depth. Additionally, [ESCA Guidelines](#) state that, if activity is proposed within 1 nautical mile of a cable, dialogue should take place to agree mutually acceptable proximity limits.

ESCA works to promote and assist with the local distribution of data and, in collaboration with the Kingfisher Information Service of Seafish, has developed the KIS-ORCA project, aimed at providing fishers with accurate, up-to-date and free information relating to the location of subsea cables and offshore renewable energy structures across Europe. [ESCA](#) has also issued an advisory statement on vessels operating in the vicinity of subsea cables. Cable routes are also identified in this Technical Statement, on the [KIS-ORCA Offshore Renewable & Cables Awareness map](#), on UK Hydrographic Office charts and on the [Wales Marine Planning Portal](#).

The following maps show subsea cables and the SAF_01a area for Subsea Cabling applying at the date of the publication of this Technical Statement. Developers and decision makers should refer to current maps on the [Wales Marine Planning Portal](#) and should refer to the Marine Planning Portal for a combined map of current subsea cables and the Subsea Cabling SAF_01a area.

The Subsea Cables SAF_01 Area was derived from data provided by OceanWise on the locations of subsea cabling running through the WNMP area. Reflecting the need to allow safe access to installed cables, a buffer of 250m was applied on either side of each cable within the WNMP area to create the SAF_01a safeguarding area. This figure was determined following discussion with ESCA and The Crown Estate, and represents a standardised and indicative buffer, reflecting The Crown Estate's Works Restriction Zone for subsea telecoms cables and electricity interconnector cables. However, in practice, developers and decision makers will need to ensure sufficient space is allowed for safe access to, and repair of installed cables; this usually equates to a buffer on either side of the cable of three times the water depth. Additionally, [ESCA Guidelines](#) state that, if activity is proposed within 1 nautical mile of a cable, dialogue should take place to agree mutually acceptable proximity limits.

Subsea Cables



Subsea Cables

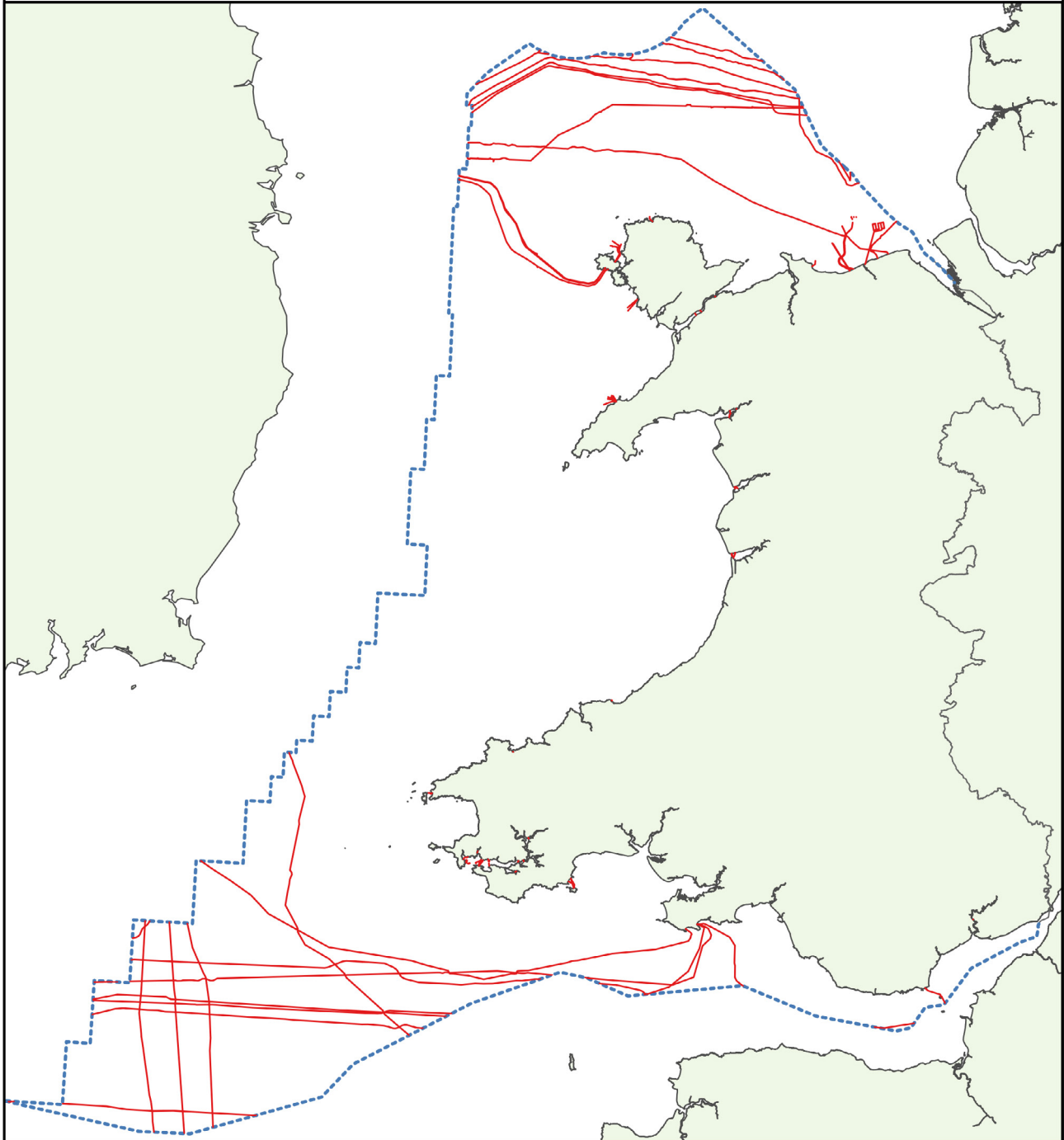
- Power line
- Communications
- Undefined
- - - WNMP Area Boundary

0 25 50 km

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Subsea Cables

Areas safeguarded by policy SAF_01a



- Subsea Cables SAF_01a Area
- - - WNMP Area Boundary

0 25 50 km

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