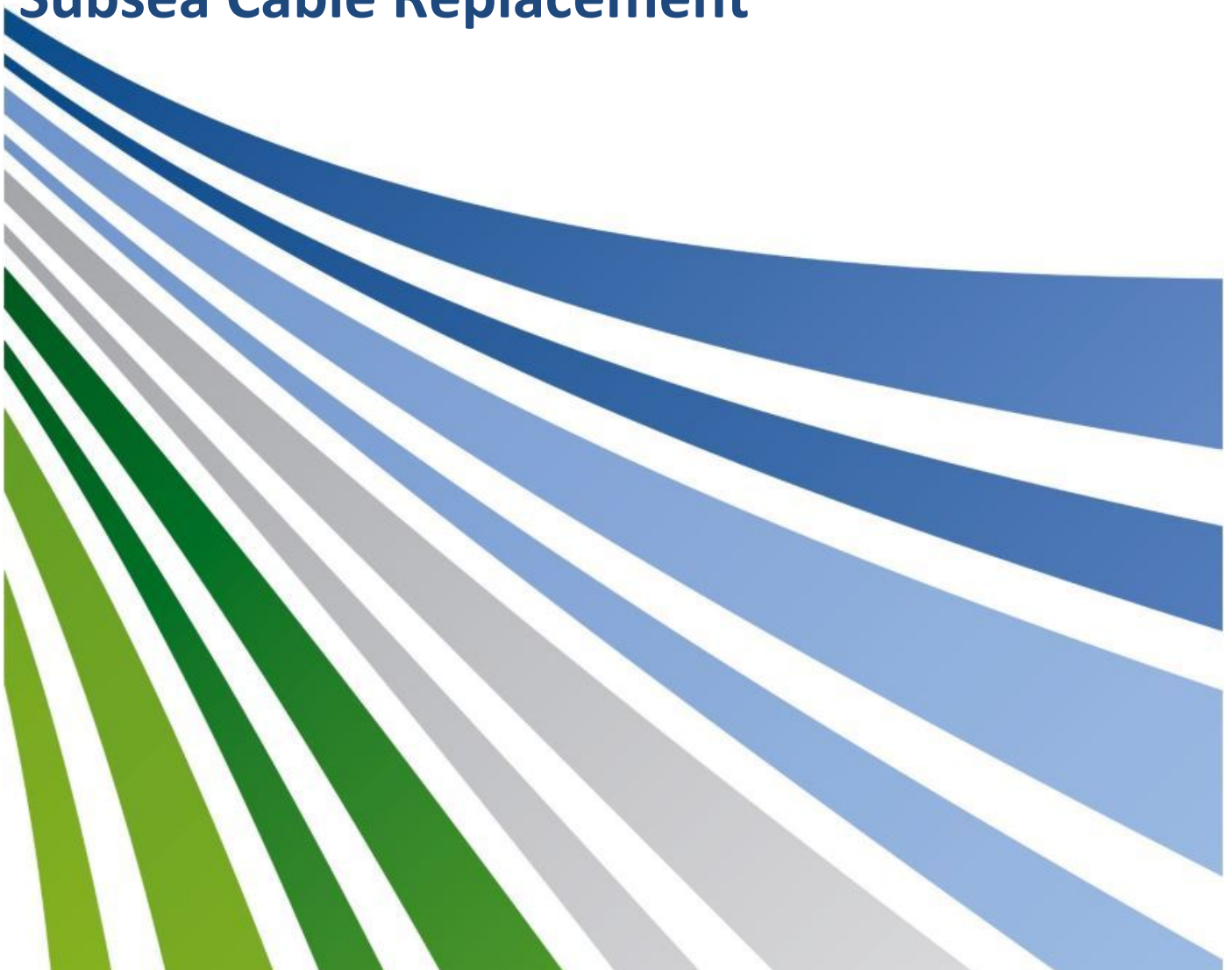


Scottish Hydro Electric Power Distribution Pre-application Consultation Report Eday – Westray Sanday – Eday Subsea Cable Replacement



	Name	Title	Signature
Applicant	Scottish Hydro Electric Power Distribution	Eday – Westray Sanday - Eday	
Author	Robin Burnett	Lead Marine Consents Manager	
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1 Introduction

- 1.1 Scottish Hydro Electric Power Distribution plc (SHEPD) holds a licence under the Electricity Act 1989 for the distribution of electricity in the north of Scotland including the Islands. It has a statutory duty to provide an economic and efficient system for the distribution of electricity and to ensure that its assets are maintained to ensure a safe, secure and reliable supply to customers.
- 1.2 As a result of subsea faults on the Eday – Westray and Sanday – Eday submarine power distribution cables there is a requirement to replace both cables in order to restore grid connection to Eday. The 33kV Eday – Westray cable faulted on 7th August 2020 at 21:01 hours affecting supplies to 977 customers on Eday, Sanday, Stronsay and Shapinsay. On 2nd November 2020 the Eday to Sanday 33kV submarine electricity cable faulted affecting 853 customers on Sanday, Stronsay and Shapinsay.
- 1.3 As a result of these faults customers on Eday were initially supplied by mobile diesel generation until a temporary network solution was put in place on Friday 5th March which has enabled domestic power supplies to be restored. Renewable energy generation relating to the Eday Community Turbine and EMEC tidal testing centre is however unable to export and security of supply to the islands of North Ronaldsay, Stronsay, Shapinsay, Rousay, Eglisay, Wyre, Westray and Papa Westray is reduced.
- 1.4 Testing of the cables has identified the fault on the Eday – Westray cable as lying 3.9km from Westray and on the Eday – Sanday cable as lying 2km from Sanday. Although separate projects for consenting purposes SSEN is planning to undertake complete replacement of both these cables as a single campaign. This document provides a description of both projects, detailing the physical construction of the cable, the proposed routeing, method of installation and operation of the cable.
- 1.5 This Pre-application Consultation report provides details as required by Marine (Scotland) Act 2010: Section 24. SHEPD are applying for separate marine licenses to carry out replacement of these cables under Part 4 of The Marine (Scotland) Act 2010.
- 1.6 We have undertaken engagement with key stakeholders in order to notify them of our intended operations. We state within this report how their views have been considered and influenced our approach to cable design, installation and protection.
- 1.7 We balance stakeholder's views through our cost benefit analysis model to demonstrate (to ourselves, our customers, our regulators and all users of the sea environment that the method(s) that we propose to deploy for laying and protecting cables around the coast of Scotland justifies the expenditure and provides best value. We will use the output from this model as supporting evidence within the marine licence applications.
- 1.8 This document should be read in conjunction with the Marine Licence Applications and the supporting documents.

2 Proposed licensable marine activity

- 2.1 The licensable marine activities at the crossing of the existing submarine electricity cable routes connecting:
 - 2.1.1 Eday (landing at Fersness Bay) to Westray (landing south west of the Point of Geldibist).
 - 2.1.2 Sanday (landing at Spurness) to Eday (landing at London Bay)
- 2.2 The activity consists of the end to end installation of a submarine electricity cables between the above points which is critical for a safe and reliable supply of electricity to our customers on the islands of Eday, Sanday, Stronsay, Shapinsay, North Ronaldsay, Rousay, Egilsay, Westray, Papa Westray and Wyre.
- 2.3 A detailed project description can be found in the Marine Licence Application.

3 Applicant details

- 3.1 Mr Kevin Galbraith
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- 3.2 Scottish Hydro Electric Power Distribution plc is registered in Scotland No SC213460.

4 Proposed licensee details

- 4.1 As per applicant details.

5 Pre-application Consultation

5.1 SHEPD hold licences for the existing cables as detailed below:

5.1.1 Sanday – Eday 1979 Coast Protection Act Section 34 consent.

5.1.2 Eday – Westray 2013 Marine Licence 04843/13/0.

5.2 As SHEPD have previously been granted the above consents and licences for the construction of a cable greater than 1853 m in length which crosses the intertidal area at these locations, then section 23 of the Marine (Scotland) Act 2010 does not apply and we have not had to carry out formal Pre-Application Consultation, however we have consulted stakeholders. Consultation began in November 2020 and has primarily been with statutory stakeholders and those marine users who may be affected by our operations.

5.3 Consultation was initially undertaken to raise awareness of the faults and the steps being taken to remedy these. Most recently we shared more detailed information regarding cable routeing, installation procedures, potential protection measures and the timeframe for the works. A draft of the project description has been shared with the stakeholders as detailed below.

5.4 Table 1 lists the consultations that have been carried out to date.

Table 1 – List of Consultees

Organisation	Date	Project Information Shared
Orkney Fisheries Association	06/11/2020	Forthcoming works overview including Eday – Westray and Sanday – Eday faults.
Scottish Fishermen’s Federation	19/11/2020	Forthcoming works overview.
Orkney Islands Council	20/11/2020	Forthcoming works overview.
Northern Lighthouse Board	27/11/2020	As above with discussion of Eday – Westray and Sanday - Eday fault specific areas.
MCA	30/11/2020	Forthcoming works overview.
RSPB	10/12/2020	Forthcoming works overview.
NatureScot	11/12/2020	Forthcoming works overview.
Crown Estate Scotland	17/12/2020	Forthcoming works overview.
SEPA	10/02/2021	Forthcoming works overview.
Crown Estate Scotland	25/02/2021	Forthcoming works overview.
NatureScot	04/03/2021	Project briefing based on Project Description.
Scottish Fishermen’s Federation & Orkney Fisheries Association	04/03/2021	Project briefing based on Project Description.
Orkney Islands Council & Orkney Ferries	10/03/2021	Project briefing based on Project Description.

6 Information provided by the prospective applicant during pre-application stage

6.1 Prior to submission of this Marine Licence Application, a draft project description was provided to:

- Scottish Fishermen's Federation
- Orkney Fisheries Association
- Orkney Islands Council
- Orkney Ferries
- NatureScot

7 Information received by the prospective applicant at the pre-application stage

7.1 In the course of pre-application discussion consultees comments included the following :

- Scottish Fishermen's Federation:
 - Would prefer to see the existing cables decommissioned;
 - Raised concerns that the timescale for the works were being driven by contracts relating to renewable generators;
 - Considered that given the prevalence of static gear fishing in the area there was unlikely to be a significant concern from a fisheries perspective
- NatureScot:
 - Welcomed the use of the Dynamic Coast information to inform the landfall location selection;
 - Would like to see how the proposed route compares with the existing route;
 - Advised that the period of activity would be out with Grey Seal pupping and moulting season (with reference to the Faray and Holm of Faray SAC);
 - Considered that the activities were sufficiently distant from the Rusk Holm Seal Haul out to avoid having an effect on this site;
 - Considered that there would be connectivity with the Calf of Eday SPA but that there was unlikely to be an adverse effect. Vessels in transit should adhere to the Scottish Wildlife Watching Code.
 - Provided advice on otters relevant to the landfall locations
- Orkney Islands Council:
 - OIC welcomed the pre-engagement and stated that this would help in the consideration of the application particularly given their role in the Orkney Marine Planning Partnership.
- Orkney Ferries:
 - Advised that the Sanday – Eday route would have no impact on ferries but that during the Eday – Westray operation ferries may have to route to the west of Rusk Holm to give sufficient clearance. Overall it was felt that the lay element of the projects would have limited impact on ferries. Orkney Ferries advised that notice

- to them on the day prior to the lay operations being in the Rusk Holm to Faray corridor would be sufficient;
- Requested further dialogue with the contractor to ensure plant and equipment could be accommodated on the inter-island ferries.
 - Crown Estate Scotland:
 - Requested information on final route in order to check for any potential conflicts with other utilities etc. CES did however outline that they didn't want to get in the way of emergency reconnection and would work alongside SSEN where possible.
 - RSPB:
 - Requested that SSEN to provide maps and diagrams of radius around proposed works;
 - Requested that SSEN share location plan of 2021 subsea programme.
 - MCA:
 - MCA advised that it was a priority of the coming months to review the standard condition wording particularly around:
 - 5% depth change – MCA recognize that in certain circumstances (e.g. beaches) the present condition wording makes compliance with this condition challenging.
 - Requirement for Magnetic Deviation study;
 - UXO matters.
 - Northern Lighthouse Board:
 - No specific comments relating to the proposals

8 Comments or changes made following comments received during pre-application stage

- 8.1 **Decommissioning:** The Marine Licence applications will include consideration of the need to potentially remove short lengths of cable in order to facilitate cable landfall and/or where there are out of service cables offshore. Full decommissioning is not proposed as part of the scope of these projects.
- 8.2 **Comparison of cable routes:** The proposed route corridors are both centred on the existing cable RPL with the MEA evaluating the potential environmental effects the new cable may have within these corridors. As both the existing and proposed cables would be surface laid it is considered that the effects of the cables themselves would be very similar. When comparing the two cables the most significant potential change in effects is likely to be associated with the presence of protection and stabilisation measures on the new cable.

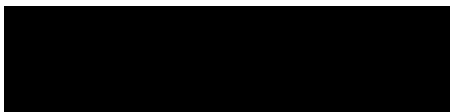
- 8.3 **Inter-island ferries:** Dialogue meetings are to be initiated between the contractor, SHEPD and Orkney Ferries to discuss transport of materials. In line with the FLMAP, Notice to Mariners shall be issued and Orkney Ferries informed of cable installation and survey operations to allow for routing planning.

9 Certification

Mr Kevin Galbraith
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I certify that I have complied with the legislative requirements relating to pre-application consultation and that the pre-application consultation has been undertaken in accordance with statutory requirements.

Signature



Date 22nd March 2021