



**Scottish & Southern**  
Electricity Networks



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Licensing Operations Team  
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Our ref. 0578  
Your ref.

Dear Neil

### **The Marine (Scotland) Act 2010** **Mainland Orkney - Hoy (North and Centre) Cable Replacements**

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.

Following inspection of the Mainland Orkney to Hoy North and Centre cables these assets have been identified as requiring replacement.

SHEPD is therefore applying for a Marine Licence to replace these cables and wishes to undertake these works commencing towards the end of November 2021 and running through to early 2022. An installation contractor has been engaged and their input has informed preparation of the Marine Licence supporting documents.

The marine licence application for these cable replacements is supported by several documents. A full list of these is provided separately but in summary they comprise:

- **Project Descriptions**

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Separate Project Descriptions have been prepared for each cable. These provide details of the cable route corridor, cable design, anticipated protection measures, installation methodology and outlines the scheduling of works. The Project Descriptions reflect the output of route engineering studies undertaken to date, some of which concluded shortly before this application, and on this basis can be considered the most likely installation scenarios. The Marine Environmental Appraisal considered a more onerous scale of stabilisation deposits based on earlier design outputs and concluded that there would be no significant impacts.

- **Pre-application Consultation Report**

As required by section 23 of the Marine (Scotland) Act 2010 SHEPD have undertaken pre-application consultation including an online PAC event on 29<sup>th</sup> April 2021. In addition, we have consulted extensively with stakeholders and include a report summarising these discussions and the online PAC event.

- **Cost Benefit Analysis**

The CBA model was designed to help with the identification of the best value method of cable installation, burial, protection, inspection and maintenance which satisfies all current legislation. The output of the CBA model helps to demonstrate (to ourselves, our customers, our regulators and all users of the sea environment) that the method(s) proposed to deploy for installing these submarine electricity cables justifies the expenditure and provides best value. The CBA model supports our marine licence application by illustrating how we consider the cumulative impact of our engineering design. Separate CBAs have been produced for each cable and include a scenario that matches as close as possible to the proposed scopes of work described in the Project Descriptions.

- **Marine Environmental Appraisal**

Whilst a full Environmental Impact Assessment is not required for submarine cables, Marine Scotland advises, in their Guidance for Marine Licence Applicant Version 2 June 2015 (Marine Scotland, 2015), that “applicants for marine licences for submarine cables should consider the scale and nature of their projects and give consideration to the need for a proportionate environmental assessment”.

For larger projects, where there is potential for the subsea cable to impact key environmental receptors, it is recommended by Marine Scotland (Marine Scotland, 2015), that an assessment of potential impacts on these receptors is carried out. Results from this assessment along with other relevant information about the Project should then be provided to support the Marine Licence application. A single Marine Environmental Appraisal (MEA) has been produced covering both cable replacements and this should be read in conjunction with the Fishing Liaison and Mitigation Action Plan (FLMAP). The MEA makes a proportionate environmental

assessment of the project against receptors in the vicinity of the works. As stated above in the Project Description section the MEA has assessed a more onerous scale of deposits than those which are presented in the accompanying Project Descriptions. The Marine Licence application is based on the deposits and activities assessed in the MEA.

- **Fishing Liaison and Mitigation Action Plan covering all legitimate sea users**

The purpose of the FLMAP is to:

- a) Illustrate the associated risks to the commercial fisheries industry (and other legitimate sea users) and address the potential effects (highlighted in the marine licence evidence) and;
- b) Identify how to minimise and mitigate potential impacts on local communities. A summary assessment of all the potential marine interactions and activities which could influence or affect the proposed cable works are given in Chapters 6, 7 and 8 of the FLMAP.

The FLMAP Delivery Programme sets out how the CFLO and FIR will communicate during the works and how the deliverables, set out in the Fishing Liaison Mitigation Action Plan, will be measured and fulfilled. This document will also highlight any regional specific communication and consultation that is required, which may extend the notice period required to issue notice to mariners and communicate upcoming works. It will also highlight any ongoing issues which may arise throughout the emergency repair works.

How Scottish Hydro Electric Power Distribution co-exists with other marine users details how we plan to co-exist with other marine users as we carry out these works and follows on from prior consultation engagement with fishermen in 2019.

- **Construction Environment Management Plan**

Mitigation measures, monitoring and reporting procedures which have been incorporated into the design and installation of the replacement cables in order to prevent or reduce adverse environmental affects as much as possible are detailed within the Construction Environment Management Plan (CEMP).

- **Operation, Inspection, Maintenance and Decommissioning Strategy**

The Operation, Inspection, Maintenance and Decommissioning Strategy sets out the approach to:

- Operation: following installation of the cables, connection and energisation to the network
- Inspection: the visual inspection or tracking of the cables following installation

- **Maintenance:** remedial works driven by condition-based information or following inspections in the marine and/or land environments
- **Decommissioning:** follows de-energisation of the cables at the end of their operational life

Additionally, SHEPD is seeking an EPS Licence to enable them (and their contractors) to use an Ultra-Short Baseline (USBL) system for subsea positioning of the replacement cables. A Basking Shark disturbance licence is also being applied for.

Yours sincerely



Kevin Galbraith  
Head of Subsea Cable Project Delivery