



# Eastern Green Link 3

Marine Environmental Appraisal

## Appendix 2A: National Marine Plan Compliance Assessment

Prepared for: Scottish Hydro Electric Transmission plc (SHE-T)



collaborative  
environmental  
advisers

Date: August 2025

Document Reference: C01494a\_NGET\_REP\_D0566

Version Number: 0

Point of Contact: Patricia Elder

Tel: [Redacted]

Email: [Redacted]

Collaborative Environmental Advisers  
Registered in England at Mountbatten House, 1 Grosvenor Square,  
Southampton, SO15 2JU  
Registered number: 11114584

[Redacted] ...  
Email: [info@ceaenvironmental.co.uk](mailto:info@ceaenvironmental.co.uk)  
[www.ceaenvironmental.co.uk](http://www.ceaenvironmental.co.uk)



## Record of Changes

Rev #	Date	Description	Approved
0	28/08/2025	Issued for Submission	Anna Farley
1			
2			
3			
4			
5			
6			

Responsible for	Job Title	Name	Date	Signature
Content	Consultant	Ella Evans	29/08/2025	EE
Checked	Technical Director	Julie Drew Murphy	29/08/2025	[Redacted]
Approved	Technical Director	Anna Farley	29/08/2025	[Redacted]
Copyright:	CEA ©	Document Reference:	C01494a_NGET_REP_D0566	

This document has been checked in line with internal quality control requirements.

### Disclaimer

This technical report has been prepared by Collaborative Environmental Advisers with all reasonable skill and care. No part of this document may be reproduced without the prior written approval of Collaborative Environmental Advisers



## Table of Contents

Record of Changes .....	2
Table of Contents .....	3
Abbreviations/Glossary .....	4
1. National Marine Plan Assessment .....	5
1.1. Introduction .....	5
1.2. Proposed Development .....	5
1.3. Marine Policy and Plan Assessment.....	7



## Abbreviations/Glossary

Abbreviation	Description
ALARP	As Low as Reasonably Practicable
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EGL	Eastern Green Link
EMF	Electromagnetic Field
EU	European Union
FMMP	Fisheries Management and Mitigation Plan
GW	Gigawatt
HDD	Horizontal Directional Drilling
HVDC	High Voltage Direct Current
MARPOL	International Convention for the Prevention of Pollution from Ships
MCAA	Marine and Coastal Access Act
MD-LOT	Marine Directorate - Licensing Operations Team
MEA	Marine Environmental Assessment
MEAp	Marine Environmental Appraisal
MMMP	Marine Mammal Management Plan
MoD	Ministry of Defence
NM	Nautical Mile
NRA	National Risk Assessment
PAC	Pre-Application Consultation
PLONOR	Pose Little or No Risk
RLB	Red Line Boundary
SNCB	Statutory Nature Conservation Bodies
UNCLOS	UN Convention on the Law of the Sea
WFD	Water Framework Directive



## 1. National Marine Plan Assessment

### 1.1. Introduction

The introduction of the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009 (MCAA) introduced a legislative and management framework for the marine environment across Scotland's seas. Marine planning in Scotland's inshore waters is governed by the Marine (Scotland) Act 2010 and in offshore waters by the MCAA. The Marine (Scotland) Act 2010 and MCAA created a tiered approach to marine planning in the UK and Scotland. UK administrations share a common vision of clean, healthy, safe, productive and biologically diverse oceans and seas which is set out in the jointly adopted UK Marine Policy Statement 2011<sup>1</sup> and provides a consistent, high-level policy context for development of marine plans across the UK to achieve this vision.

In Scotland, the Marine Directorate - Licensing and Operations Team (MD-LOT) are the responsible authority for the marine environment and have set out an overarching framework for all marine activity in Scottish seas within Scotland's National Marine Plan<sup>2</sup>. There is no similar legal requirement to take decisions in accordance with the UK Marine Policy Statement, though the National Marine Plan must conform with the UK Marine Policy Statement unless relevant considerations indicate otherwise.

In support of the Marine License Application to MD-LOT, the Proposed Development's compliance with Scotland's National Marine Plan policies has been reviewed, with references to the relevant Marine Environmental Appraisal (MEAp) chapters, where appropriate, to provide further details.

### 1.2. Proposed Development

Eastern Green Link (EGL) 3 comprises a 2-gigawatt (GW) HVDC link between Aberdeenshire in Scotland, and King's Lyns and West Norfolk, Norfolk, with a landfall on the Lincolnshire coastline, England. EGL 3 comprises approximately 700 km of subsea and underground high voltage direct current (HVDC) cables between new converter stations at each end of the electricity transmission link. A Development Consent Order (DCO) under the Planning Act 2008 is being sought for the English Offshore Scheme. A Marine Licence is being sought for the development within Scottish Waters. The Scottish Ministers have devolved powers to grant the Marine Licence under the Marine (Scotland) Act 2010 (within territorial waters up to 12 nautical miles (NM)) and the MCAA in the Scottish offshore region, beyond 12 NM.

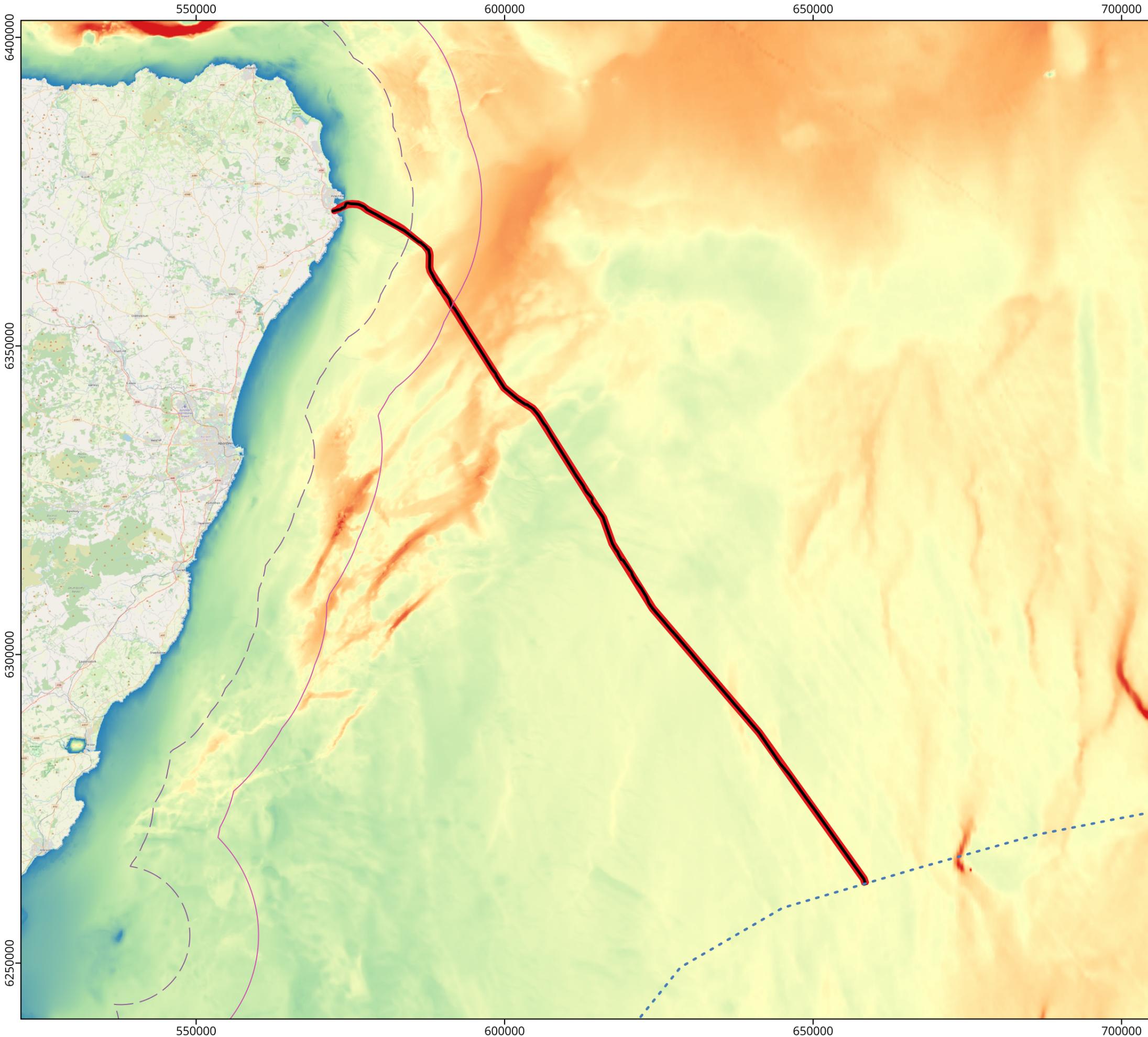
The Proposed Development comprises the Red Line Boundary (RLB) which delineates a corridor which is nominally 700m wide. This width is considered adequate to micro-site around sensitive seabed features or habitat, or to allow for the footprint of installation vessels and is the maximum extent of seabed in which construction and operation of the Proposed Development may take place. The final cable route will lie within the extent of the RLB. The RLB is shown in **Figure 1-1 (Drawing reference C01494-EGL3-LOC-001-A)**.

The construction programme is expected to take approximately 55 months from start to finish of the end to end Project. The Proposed Development is envisaged to commence on-site construction at the earliest in 2028 with the latest possible completion by 2033.

The exact timing of construction would be dependent upon the date of the contract award for the works, consenting timeframes, time required for detailed design and cable manufacture, availability of cable installation and other vessels and any restrictions to mitigate potential effects on features of conservation interest, fisheries or other sensitive receptors.

<sup>1</sup> HM Government, Northern Ireland Executive, Scottish Government, Welsh Assembly (2011). UK Marine Policy Statement. Available at: <https://assets.publishing.service.gov.uk/media/5a795700ed915d042206795b/pb3654-marine-policy-statement-110316.pdf> [Accessed August 2025]

<sup>2</sup> Scottish Government (2015) Scotland's National Marine Plan. Available at: <https://www.gov.scot/publications/scotlands-national-marine-plan/> [Accessed August 2025]



**EGL 3 Red Line Boundary**

**C01494-EGL3-MEA-LOC-001-A**



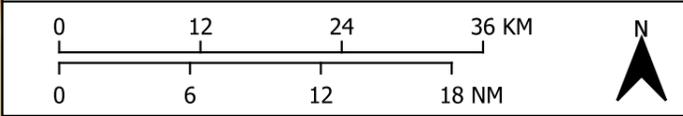
**Legend**

-  Cable Route
-  Red Line Boundary

**Bathymetry (m)**



-  6NM Limit
-  12NM Limit
-  Scottish Adjacent Waters



<b>Date</b>	13/06/2025
<b>Coordinate System</b>	ETRS89 / UTM zone 30N
<b>Projection</b>	Universal Transverse Mercator (UTM)
<b>Unit</b>	meters
<b>Scale at A3</b>	1:600,000
<b>Created</b>	AN
<b>Reviewed</b>	JC
<b>Authorised</b>	JDM

CEA 2025, All Rights Reserved



### 1.3. Marine Policy and Plan Assessment

The relevant policies of Scotland’s National Marine Plan are listed in Error! Reference source not found. and details provided on how these have been considered by the Applicant, including references to the relevant MEAp chapters where applicable.

Table 1-1: Relevant Policy within Scotland’s National Marine Plan

Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
General Policies (GEN)	GEN 1 General Planning Policy	There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.	This appendix provides a checklist of these policies to signpost where and how they have been considered in the production of this Marine Environmental Appraisal (MEAp) and to demonstrate compliance.	Direct Policy Compliance
	GEN 2 Economic Benefit	Sustainable development and use which provides economic benefit to Scottish communities is encouraged when consistent with the objectives and policies of this Plan.	The Proposed Development is for the reinforcement of electrical transmission infrastructure between Scotland and England; the benefit of the Proposed Development is detailed in <b>Chapter 2: Project Need and Alternatives</b> .	Direct Policy Compliance
	GEN 4 Coexistence	Proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision-making processes, when consistent with policies and objectives of the Plan.	The Applicant is committed to co-existence between the Proposed Development and other users of the marine environment. Embedded mitigation measures are described in <b>Chapter 13 Other Marine Users</b> , and <b>Chapter 12: Commercial Fisheries</b> and listed in <b>Chapter 15: Schedule of Mitigation</b> . Embedded mitigation includes: <ul style="list-style-type: none"> <li>CF01 - A Fisheries Liaison Officer (FLO) and fisheries working group(s) will be maintained throughout construction to ensure project information is effectively disseminated, dialogue is maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season. Details of the FLO will be included in the Fisheries Management and Mitigation Plan (FMMP).</li> </ul>	Direct Policy Compliance
Historic Environment	GEN 6 Historic Environment	Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.	A detailed appraisal of the potential effects of the Proposed Development on heritage sites are provided in <b>Chapter 14: Marine Archaeology</b> , which includes embedded mitigation to minimise any adverse effects and maintain the baseline environment.  A Protocol for archaeological discoveries as well as a Written Scheme of Investigation will be in place for the duration of the construction of the Proposed Development.	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
Coastal Process and Flooding	GEN 8 Coastal Process and Flooding	Developments and activities in the marine environment should be resilient to coastal change and flooding and not have unacceptable adverse impact on coastal processes or contribute to coastal flooding.	The Proposed Development is proposing the use of a trenchless technique such as Horizontal Directional Drilling (HDD) for the construction of the Proposed Development at the landfall. As assessed in <b>Chapter 6: Marine Physical Processes</b> , there are no significant effects to coastal processes that could contribute to coastal flooding at the landfall and no adverse effects on coastal processes.	Direct Policy Compliance
Natural Heritage	GEN 9 Natural Heritage	Development and use of the marine environment must:  (a) Comply with legal requirements for protected areas and protected species.  (b) Not result in significant impact on the national status of Priority Marine Features.  (c) Protect and, where appropriate, enhance the health of the marine area.	The potential effects of the Proposed Development on protected sites and species are considered within <b>Chapter 7: Intertidal and Subtidal Benthic Ecology, Chapter 8: Fish and Shellfish, Chapter 9: Intertidal and Offshore Ornithology and Chapter 10: Marine Mammals and Marine Reptiles</b> and their supporting appendices.  A Habitats Regulations Appraisal ( <b>Appendix 5A</b> ), Marine Protected Area Appraisal ( <b>Appendix 5C</b> ), Report to inform Appropriate Assessment ( <b>Appendix 5B</b> ) and a Water Framework Directive Assessment ( <b>Appendix 6B</b> ) have been prepared to demonstrate compliance with legal requirements for protected areas and protected species.	Direct Policy Compliance
Invasive non-native species	GEN 10 Invasive non-native species	Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.	The risk of introduction of invasive non-native species is considered within <b>Chapter 7: Intertidal and Subtidal Benthic Ecology</b> .  <b>Appendix 3B: Outline Construction Environmental Management Plan</b> (CEMP) has been developed which provides framework within which best practice measures will be implemented and followed in relation to risks associated with invasive non-native species. All vessels will be required to comply with the International Convention for the Control and Management of Ships' Ballast water and Sediments (IMO, 2017).	Direct Policy Compliance
Marine Litter	GEN 11 Marine Litter	Developers, users and those accessing the marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers	Embedded mitigation as described in <b>Chapter 3: Project Description</b> will ensure that marine litter is addressed. <b>Appendix 3B: Outline Construction Environmental Management Plan</b> has addressed that a Waste Management Plan will form part of the Proposed Development CEMP. All vessels operating will be in compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL) regulations and will be equipped with waste disposal facilities onboard. This measure will ensure the Proposed Development will not increase the amount of marine litter.	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
Water quality and resource	GEN 12 Water Quality and Resource	Developments and activities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.	The potential changes in water quality are reported in <b>Chapter 6: Marine Physical Processes</b> , where no significant effects are anticipated. A Water Framework Directive compliance assessment ( <b>Appendix 6B</b> ) has been undertaken, confirming that the Proposed Development's activities will not result in deterioration of the relevant water bodies.	Direct Policy Compliance
Noise	GEN 13 Noise	Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.	The potential adverse effects of underwater noise from the Proposed Development have been assessed and reported in <b>Chapter 10: Marine Mammals and Marine Reptiles</b> and <b>Chapter 7: Intertidal and Subtidal Benthic Ecology</b> . These chapters concluded that underwater noise effects were not significant, and no additional mitigation is required.  Standard mitigation for noise related impacts to marine mammals will be employed by the Proposed Development. Such mitigation will be included within a Marine Mammal Mitigation Plan (MMMP) to be approved by MD-LOT in consultation with relevant SNCBs.	Direct Policy Compliance
Fairness	GEN 17 Fairness	All marine interests will be treated with fairness and in a transparent manner when decisions are being made in the marine environment.	The Applicant is committed to co-existence between the Proposed Development and other users of the marine environment; this is detailed in <b>Chapter 13: Other Marine Users</b> , <b>Chapter 11: Shipping and Navigation</b> and <b>Chapter 12: Commercial Fisheries</b> .	Direct Policy Compliance
General	GEN 18 Engagement	Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.	Consultation has been undertaken with relevant stakeholders and the public. The consultation and the Proposed Development's response to the points raised is reported in all chapters of the MEA.  In addition, the Applicant has complied with all statutory requirements for consultation as part of the Pre-Application Consultation (PAC) requirements.  A PAC Report is provided with the Marine Licence application and MEAp.	Direct Policy Compliance
Fisheries, Marine Planning Policies	FISHERIES 1	Taking account of the EU's Common Fisheries Policy, Habitats Directive, Birds Directive and Marine Strategy Framework Directive, marine planners and decision makers should aim to ensure:  a) Existing fishing opportunities and activities are safeguarded wherever possible.	The Applicant is committed to co-existence between the Proposed Development and other users of the marine environment including commercial fisheries. A range of embedded mitigation has been detailed in <b>Chapter 3: Project Description</b> and <b>Chapter 14: Commercial Fisheries</b> . Mitigation includes:	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
		<p>b) An ecosystem-based approach to the management of fishing which ensures sustainable and resilient fish stocks and avoids damage to fragile habitats.</p> <p>c) Protection for vulnerable stocks (in particular for juvenile and spawning stocks through continuation of sea area closures where appropriate).</p> <p>d) Improved protection of the seabed and historical and archaeological remains requiring protection through effective identification of high-risk areas and management measures to mitigate the impacts of fishing, where appropriate.</p> <p>e) That other sectors take into account the need to protect fish stocks and sustain healthy fisheries for both economic and conservation reasons.</p> <p>f) Delivery of Scotland's international commitments in fisheries, including the ban on discards. Mechanisms for managing conflicts between fishermen and between the fishing sector and other users of the marine environment</p>	<ul style="list-style-type: none"> <li>A Fisheries Liaison Officer and working groups will be maintained throughout installation to ensure open dialogue with commercial fisheries stakeholders.</li> </ul>	
	FISHERIES 2	<p>The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on fishing:</p> <p>a) The cultural and economic importance of fishing, in particular to vulnerable coastal communities.</p> <p>b) The potential impact (positive and negative) of marine developments on the sustainability of fish and shellfish stocks and resultant fishing opportunities in any given area.</p> <p>c) The environmental impact on fishing grounds (such as nursery, spawning areas), commercial fisheries species, habitats and species more generally. The potential effect of displacement on: fish stocks; the wider environment; use of fuel; socio-economic costs</p>	<p>The potential effect of the Proposed Development on fish and shellfish stock, including effects on habitats, migration, spawning and nursery grounds (including commercially important species) have been assessed in <b>Chapter 8: Fish and Shellfish</b> of the MEAp. The assessment concluded that there are no significant effects on fish and shellfish receptors.</p> <p>The potential effects on commercial fisheries receptors as well as the displacement of fishing activity is assessed in <b>Chapter 12: Commercial Fisheries</b> of the MEAp. The assessment concluded that there are no significant effects on commercial fisheries receptors.</p>	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
		to fishers and their communities and other marine users.		
	FISHERIES 3	<p>Where existing fishing opportunities or activity cannot be safeguarded, a Fisheries Management and Mitigation Strategy should be prepared by the proposer of development or use, involving full engagement with local fishing interests (and other interests as appropriate) in the development of the Strategy. All efforts should be made to agree the Strategy with those interests. Those interests should also undertake to engage with the proposer and provide transparent and accurate information and data to help complete the Strategy. The Strategy should be drawn up as part of the discharge of conditions of permissions granted. The content of the Strategy should be relevant to the particular circumstances and could include:</p> <p>a) An assessment of the potential impact of the development or use on the affected fishery or fisheries, both in socio-economic terms and in terms of environmental sustainability.</p> <p>b) A recognition that the disruption to existing fishing opportunities/activity should be minimised as far as possible.</p> <p>c) Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity. Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socioeconomic impacts.</p>	<p>The Applicant is committed to a co-existence between the Proposed Development and other users of the marine environment including commercial fisheries. Embedded mitigation is described in <b>Chapter 3: Project Description</b> and embedded mitigation is detailed in <b>Chapter 14: Commercial Fisheries</b> of the MEAp has been committed to promote co-existence. Additional mitigation includes:</p> <ul style="list-style-type: none"> <li>▪ A Fisheries Liaison Officer and working groups will be maintained throughout installation to ensure open dialogue with commercial fisheries.</li> <li>▪ A Fisheries Management and Mitigation Plan (FMMP) has been developed (<b>Appendix 12A</b>) and will be submitted for approval.</li> </ul>	Direct Policy Compliance
Wild Salmon and	WILD FISH 1	The impact of development and use of the marine environment on diadromous fish species should be considered in marine planning and decision making processes. Where evidence of impacts on salmon and	The impact of Proposed Development and use of the marine environment on diadromous fish species has been assessed in <b>Chapter 8: Fish and</b>	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
Diadromous Fish		other diadromous species is inconclusive, mitigation should be adopted where possible and information on impacts on diadromous species from monitoring of developments should be used to inform subsequent marine decision making.	<p><b>Shellfish.</b> No project specific mitigation was deemed necessary after the implementation of embedded mitigation such as:</p> <ul style="list-style-type: none"> <li>▪ The intention is to bury the cables in the seabed, except in areas where trenching is not possible.</li> <li>▪ Use the use of biodegradable drilling fluids (pose little or no risk substances) where practicable.</li> <li>▪ Where possible, cable protection materials would be selected to match the environment.</li> <li>▪ HVDC poles would be bundled to minimise effects of Electromagnetic Fields (EMF).</li> </ul> <p>The assessment concluded there would be no significant effects.</p>	
Offshore Wind and Marine Renewable Energy	RENEWABLES 1	Proposals for commercial scale offshore wind and marine renewable energy development should be sited in the Plan Option areas identified through the Sectoral Marine Plan process. Plan Options are considered the preferred strategic locations for the sustainable development of offshore wind and marine renewables. This preference should be considered by marine planners and decision makers if alternative development or use of these areas is being considered. Proposals are subject to licensing and consenting processes.	The Proposed Development is not a offshore wind farm or marine renewable energy development; however, a cumulative effect of both the Proposed Development and the shortlisted surrounding projects has been included in <b>all</b> topic chapters of the MEAp. These assessments concluded no significant cumulative effects. The applicant is committed to coexistence between the Proposed Development and other marine users, for example renewable energy developments.	Direct Policy Compliance
Recreation and Tourism	REC & TOURISM 2	<p>The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on recreation and tourism:</p> <p>a) The extent to which the proposal is likely to adversely affect the qualities important to recreational users, including the extent to which proposals may interfere with the physical infrastructure that underpins a recreational activity.</p> <p>b) The extent to which any proposal interferes with access to and along the shore, to the water, use of the</p>	<p>An assessment of potential effects of the Proposed Development on marine recreational activities is presented in <b>Chapter 13: Other Marine Users</b>, where the potential effects of the Proposed Development were assessed as being not significant. In <b>Appendix 6B: Water Framework Directive Assessment</b>, the potential effects of the Proposed Development on bathing waters were assessed as being not significant.</p> <p>Embedded mitigation measures described in <b>Chapter 3: Project Description</b>, and receptor-specific mitigation measures have been outlined in the respective chapters.</p>	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
		<p>resource for recreation or tourism purposes and existing navigational routes or navigational safety.</p> <p>c) Where significant impacts are likely, whether reasonable alternatives can be identified for the proposed activity or development.</p> <p>Where significant impacts are likely and there are no reasonable alternatives, whether mitigation, through recognised and effective measures, can be achieved at no significant cost to the marine recreation or tourism sector interests.</p>		
Shipping and Navigation	TRANSPORT 1	<p>Navigational safety in relevant areas used by shipping now and in the future will be protected, adhering to the rights of innocent passage and freedom of navigation contained in UN Convention on the Law of the Sea (UNCLOS). The following factors will be taken into account when reaching decisions regarding development and use:</p> <ul style="list-style-type: none"> <li>▪ The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and defined approaches to ports.</li> <li>▪ Where interference is likely, whether reasonable alternatives can be identified.</li> <li>▪ Where there are no reasonable alternatives, whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organization can be achieved at no significant cost to the shipping or ports sector</li> </ul>	<p><b>Chapter 11: Shipping and Navigation</b> of the MEAp reports on the risk for the Proposed Development to interfere with existing and planned routes used by shipping, access to existing ports and harbours and navigational safety. The appraisal concludes no significant effects. <b>Appendix 11A: Navigational Risk Assessment</b> further identifies, assesses, and helps control potential hazards to vessel safety, crew, the environment, and assets.</p> <p>The design of the Proposed Development, as reported in <b>Chapter 3: Project Description</b> of the MEAp, includes a description of embedded mitigation measures in relation to navigational safety. <b>Chapter 11: Shipping and Navigation</b> of the MEAp also identifies additional mitigation measures required to reduce any potential effects to as low as reasonably practicable.</p>	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
	TRANSPORT 2	Marine development and use should not be permitted where it will restrict access to, or future expansion of, major commercial ports or existing or proposed ports and harbours which are identified as National Developments in the current National Planning Framework or as priorities in the National Renewables Infrastructure Plan (Map 10 and 11).	The potential effects on existing and proposed ports and harbours relevant to the Proposed Development are discussed in <b>Chapter 11: Shipping and Navigation</b> of the MEAp. The assessment of the impacts in <b>Chapter 11: Shipping and Navigation</b> receptors identified two effects that exceed minor significance during the construction and operational phases (depending on the location of repair if required). These effects were Disturbance to Existing Shipping and Fishing Patterns and Project Vessels Blocking Navigational Features. It is noted in the NRA that all risks are reduced to As Low As Reasonably Practicable (ALARP) with embedded mitigation, which involves industry standard safety precautions for cable installation and maintenance, and is therefore defined as “tolerable”. Following the implementation of the additional risk mitigation measures, the residual impacts, from all phases of the Proposed Development are considered not significant.	Direct Policy Compliance
	TRANSPORT 3	Ferry routes and maritime transport to islands and remote mainland areas provide essential connections and should be safeguarded from inappropriate marine development and use that would significantly interfere with their operation. Developments will not be consented where they will unacceptably interfere with lifeline ferry services	The potential effects on ferry routes and maritime transport routes relevant to the Proposed Development are discussed in <b>Chapter 11: Shipping and Navigation</b> of the MEAp. Across all phases of the Proposed Development, all impacts were assessed to be ‘tolerable’ or ‘broadly acceptable’. Following the implementation of the additional risk mitigation measures, the residual impacts, from all phases of the Proposed Development, can be considered not significant.	Direct Policy Compliance
	TRANSPORT 6	Marine planners and decision makers and developers should ensure displacement of shipping is avoided where possible to mitigate against potential increased journey lengths (and associated fuel costs, emissions and impact on journey frequency) and potential impacts on other users and ecologically sensitive areas.	Consideration of the potential displacement of shipping is identified and considered in <b>Chapter 11: Shipping and Navigation</b> of the MEAp. Across all phases of the Proposed Development, all impacts were assessed to be ‘tolerable’ or ‘broadly acceptable’. Following the implementation of the additional risk mitigation measures, the residual impacts, from all phases of the Proposed Development, can be considered not significant.	Direct Policy Compliance
Submarine Cables Marine Planning Policies	CABLES 1	Cable and network owners should engage with decision makers at the early planning stage to notify of any intention to lay, repair or replace cables before routes are selected and agreed. When making proposals, cable and network owners and marine users should evidence that they have taken a joined-up approach to development and activity to minimise impacts, where possible, on the marine historic and	Engagement with SNCBs has been undertaken since 2023 initially in relation to the planned marine surveys and subsequently to seek a MEA Non-Statutory Scoping Opinion. The minimisation of impacts approach has been detailed throughout all chapters of the MEAp, along with assessments of any significant impacts.	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
		natural environment, the assets, infrastructures and other users. Appropriate and proportionate environmental consideration and risk assessments should be provided which may include cable protection measures and mitigation plans. Any deposit, removal or dredging carried out for the purpose of executing emergency inspection or repair works to any cable is exempt from the marine licensing regime with approval by Scottish Ministers. However, cable replacement requires a marine licence. Marine Licensing Guidance should be followed when considering any cable development and activity		
Submarine Cables Marine Planning Policies	CABLES 2	<p>Cables should be suitably routed to provide sufficient requirements for installation and cable protection.</p> <p>New cables should implement methods to minimise impacts on the environment, seabed and other users, where operationally possible and in accordance with relevant industry practice.</p> <p>Cables should be buried to maximise protection where there are safety or seabed stability risks and to reduce conflict with other marine users and to protect the assets and infrastructure.</p> <p>Where burial is demonstrated not to be feasible, cables may be suitably protected through recognised and approved measures (such as rock or mattress placement or cable armouring) where practicable and cost effective and as risk assessments direct.</p> <p>Consideration of the need to reinstate the seabed, undertake post-lay surveys and monitoring and carry out remedial action where required.</p>	<p>A cable routing and options appraisal process was followed to identify options for routing the cable from Lincolnshire to Aberdeenshire. The routing considered the end-to-end cable route and assessed several constraints on the physical, environmental and economic environment.</p> <p>Once identified the <b>Chapter 3: Project Description</b> considers several techniques for the construction, operation (including maintenance) and decommissioning of the Proposed Development.</p>	Direct Policy Compliance
Submarine Cables	CABLES 3	A risk-based approach should be applied by network owners and decision makers to the removal of redundant submarine cables, with consideration given	Decommissioning of the Proposed Development has been detailed in <b>Chapter 3: Project Description</b> . For clarity, a separate Marine Licence and environmental assessment would be required for decommissioning.	Direct Policy Compliance



Topic	Policy Code	Policy Extract	How and where it is considered	Conclusion
		to cables being left in situ where this would minimise impacts on the marine historic and natural environment and other users.		
Defence	DEFENCE 2	For the purposes of national defence, the MoD may establish by-laws for exclusions and closures of sea areas. In most areas this will mean temporary exclusive use of areas by the MoD. Where potential for conflict with other users is identified, appropriate mitigation will be identified and agreed with the MoD, prior to planning permission, a marine licence, or other consent being granted	As detailed in <b>Chapter 13: Other Marine Users</b> of the MEAp, there are no MoD Sensitive Areas identified within the Study Area.	Not applicable
Aggregates	AGGREGATES 1	Marine planners and decision makers should consider the impacts of other development or activity on areas of marine aggregate or mineral resource. Where an interaction is identified, consideration should be given to whether there are permissions for aggregate or mineral extraction and whether they require any degree of safeguarding.	As detailed in <b>Chapter 13: Other Marine Users</b> of the MEAp, there are no aggregate sites detailed within the Study Area.	Not applicable



collaborative  
environmental  
advisers