Scottish & Southern Electricity Networks

POWER CUT? CALL 105

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Neil MacLeod
Marine Scotland
Licensing Operations Team
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

15 November 2021

Our ref. 0594
Your ref.

Dear Neil

The Marine (Scotland) Act 2010
Mull - Coll Cable Replacement

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 Mull to Coll cable this asset has been identified as requiring replacement.

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

The Mull to Coll works are planned to be undertaken commencing in late 2021 over a single installation campaign along with the replacement of the Carradale – Arran (North), Mainland Orkney to Hoy (North) and Mainland Orkney to Hoy (Centre) cables. As such the marine works will commence only once consent for all cables in this campaign have been secured. We would

therefore request that consultation on all the above cable replacement activities be initiated to help allow this schedule to be met and would appreciate feedback from MS-LOT on what timescale they would advise should be assumed for this stage of the process.

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

- **Project Description**

The Project Description provides details of the cable route corridor, cable design, protection measures, installation methodology and outlines the scheduling of works.

- **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 15th 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 this submarine electricity cable 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.

- **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. This is detailed within Marine Environmental Appraisal (MEA) which 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.

- **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 is 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 cable 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 cable, connection and energisation to the network
- Inspection: the visual inspection or tracking of the cable 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 cable at the end of its 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 cable. A Basking Shark disturbance licence is also being applied for.

Yours sincerely
[Redacted]

Kevin Galbraith
Head of Subsea Cable Project Delivery