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By email: ^[Redacted]
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18th June 2026

RE: Request for an area extension of BS-00011276

Dear ^[Redacted]

I would like to request an area extension to the existing BS-00011276 licence (received 1st April 2026) held for the Eday GSP project. The additional area required is shown in Appendix B (with the new area shown in colour) and a co-ordinates list is provided in Appendix C. This area borders the existing Basking Shark licence area, and we wish for the new area to be added in addition to the area already licenced.

SSEN Transmission are planning to undertake a habitat mapping survey of an area in the Bay of Firth (Appendix B) to confirm the presence of sensitive benthic features. In response to feedback received from the public consultation events, we are looking at the potential to landfall the subsea cable closer to the Finstown substation. However, there is an understood risk that the presence of sensitive benthic habitats will preclude cable routeing in this area. We wish to understand the benthic habitat in this area to inform further possible route exploration.

The survey is planned to take place between 1st August 2026 and 31st December 2026 and will involve an additional 55 days of survey in 2026. The habitat mapping survey will involve the following survey elements.

- Multi-beam Echosounder (MBES)
- Side Scan Sonar (SSS)
- Drop down camera

Given the equipment proposed for the planned survey activity, no EPS licence is required. However, an extension to the existing Basking Shark licence is required under the Wildlife and Countryside Act 1981, to include the habitat mapping survey area. The below risk assessment (Appendix A) provides further detail on this conclusion. The original EPS Risk Assessment (A-100782-S05-A-REPT-002) provided for the existing basking shark licence area should be referenced alongside Appendix A.

We would be grateful if a new Basking Shark Licence could be issued by the 1st August 2026 to allow us to survey in line with our current programme.

Yours sincerely,

[Redacted]

For and on behalf of Scottish Hydro Electric Transmission Plc

Appendix A - EPS and Basking Shark Risk Assessment

Introduction

SSEN Transmission are planning to undertake a habitat mapping survey of an area in the Bay of Firth (shown in colour in Appendix B) to confirm the presence of sensitive benthic features. In response to feedback received from the public consultation events, we are looking at the potential to landfall the subsea cable closer to the Finstown substation. However, there is an understood risk that the presence of Priority Marine Features (PMFs) will preclude cable routeing in this area. We wish to understand the benthic habitat in this area to inform further possible route exploration.

A survey of the area shown in Appendix A will take place over approximately 55 days between 1st August 2026 and 31st December 2026 from a single vessel. The survey area consists of approximately 57km². Survey activity will consist of Multibeam Echosounder (MBES), Side Scan Sonar (SSS) and drop-down camera work.

Please find below a risk assessment for impacts to EPS and Basking Shark from the survey activity planned within the additional survey area.

EPS

The survey area is within the SCANS IV survey block CS-K (Gilles et al, 2023). The EPS present within the survey area are harbour porpoise, white-beaked dolphin, minke whale, Risso's dolphin, killer whale and humpback whale. This presents no change to the EPS risk assessment produced for the main survey works (SSEN Transmission, 2026).

As per Table 3-1 of the EPS risk assessment (SSEN Transmission, 2026), MBES and SSS are above the hearing frequency range of marine mammals. This means that there is no impact pathway for marine mammals.

Basking Shark

Basking sharks have a low sensitivity to noise emissions as they don't have a swim bladder, however they are at risk of vessel collision due to their slow manoeuvrability. The below assesses the risk of vessel collision from the survey works.

Presence of basking shark in Orkney waters extends from May to October, which coincides with the planned survey period (Evans et al, 2011). There have been increasing numbers of sightings in Orkney in recent years however within the survey area, only 0-0.2 individuals have been recorded per square km. Studies show no sightings in the survey area between 1979 and 2010, with one sighting within 1km and no additional sightings within 10km (Evans et al, 2011). Recent citizen science data records no sightings in the survey area itself or within 5km (NBN Atlas, 2017).

The survey area overlaps with regular vessel routes for passenger vessels and shipping in and out of Kirkwall harbour. There is 100 vessel hours per km per month within the majority of the survey area (EMODnet, 2024). There is an annual route density of 1200+ for the majority of the survey area (EMODnet, 2024). As a result, one vessel will not constitute a

significant change from the existing baseline. The basking shark code of conduct will also be adhered to throughout the survey activities.

Protected Areas

The new survey area is wholly within the North Orkney SPA designated for breeding and non-breeding birds. Impacts on this SPA have been considered within the original EPS risk assessment and embedded mitigation for birds (Section 5.2). The imbedded mitigation regarding lighting will be adhered to throughout survey works. During consultation, NatureScot have highlighted that west side of the proposed survey area (shown in purple in Appendix B) is a high usage area for red throated diver foraging during the critical chick rearing period (July-August). As such, no survey activity will take place in the high usage area within this critical period.

The seasonal restriction in the EPS/Basking Shark licences excluded survey work within area within the Gairsay sound in July and August. This area is 5km north of the area within the Bay of Firth being requested.

Helliar Holm North and Elwick designated seal haul out is located 200m from the survey area. Damsay and Holm of Grimbister haul out site is approximately 500m from the survey area. No other designated haul out sites are located within 2km of the survey area. No survey work is required to take place within 200m of any designated seal haul out site within key breeding/sensitive periods for harbour seal or grey seal.

The survey area has connectivity with two SACs; Faray and Holm of Faray SAC (19km) and Sanday SAC (24km). Given the distance to these SACs and the survey equipment proposed, there will be no AEoSI on either SAC.

The survey area is out with any other designated sites.

Conclusion

It is our conclusion that no EPS licence is required for the proposed survey activities as the noise produced by the vessel and geophysical survey equipment will not pose a risk of disturbance or injury due to no activity proposed which can disturb or injure EPS.

It is concluded that it is very unlikely that basking shark disturbance will result from the survey activity. This is due to a high baseline level of shipping in the area, and only one vessel will be utilised which is not considered a significant change. Additionally, there have been low numbers of basking shark recorded in the area and the Basking Shark Code of Conduct will be followed in the event a basking shark is sighted. Despite the low-level risk of vessel collision, following consultation with NatureScot, we are applying for an extension to our existing basking shark licence to include the additional survey area to cover any residual possibility of disturbance to basking shark.

References:

EMODnet. 2024. Vessel Density Annual Averages 2017-2024. Available at: [Human Activities | European Marine Observation and Data Network \(EMODnet\)](#) (Accessed 21/05/2026).

Evans, P.G.H., Baines, M.E. & Coppock, J. 2011. Abundance and behaviour of cetaceans and basking sharks in the Pentland Firth and Orkney Waters. Report by Hebog Environmental Ltd & Sea Watch Foundation. Scottish Natural Heritage Commissioned Report No.419.

Gilles, A, Authier, M, Ramirez-Martinez, NC, Araújo, H, Blanchard, A, Carlström, J, Eira, C, Dorémus, G, FernándezMaldonado, C, Geelhoed, SCV, Kyhn, L, Laran, S, Nachtsheim, D, Panigada, S, Pigeault, R, Sequeira, M, Sveegaard, S, Taylor, NL, Owen, K, Saavedra, C, Vázquez-Bonales, JA, Unger, B, Hammond, PS. 2023. Estimates of cetacean abundance in European Atlantic waters in summer 2022 from the SCANS-IV aerial and shipboard surveys. Available at: [\(PDF\) Estimates of cetacean abundance in European Atlantic waters in summer 2022 from the SCANS-IV aerial and shipboard surveys](#) (Accessed 21/05/2026).

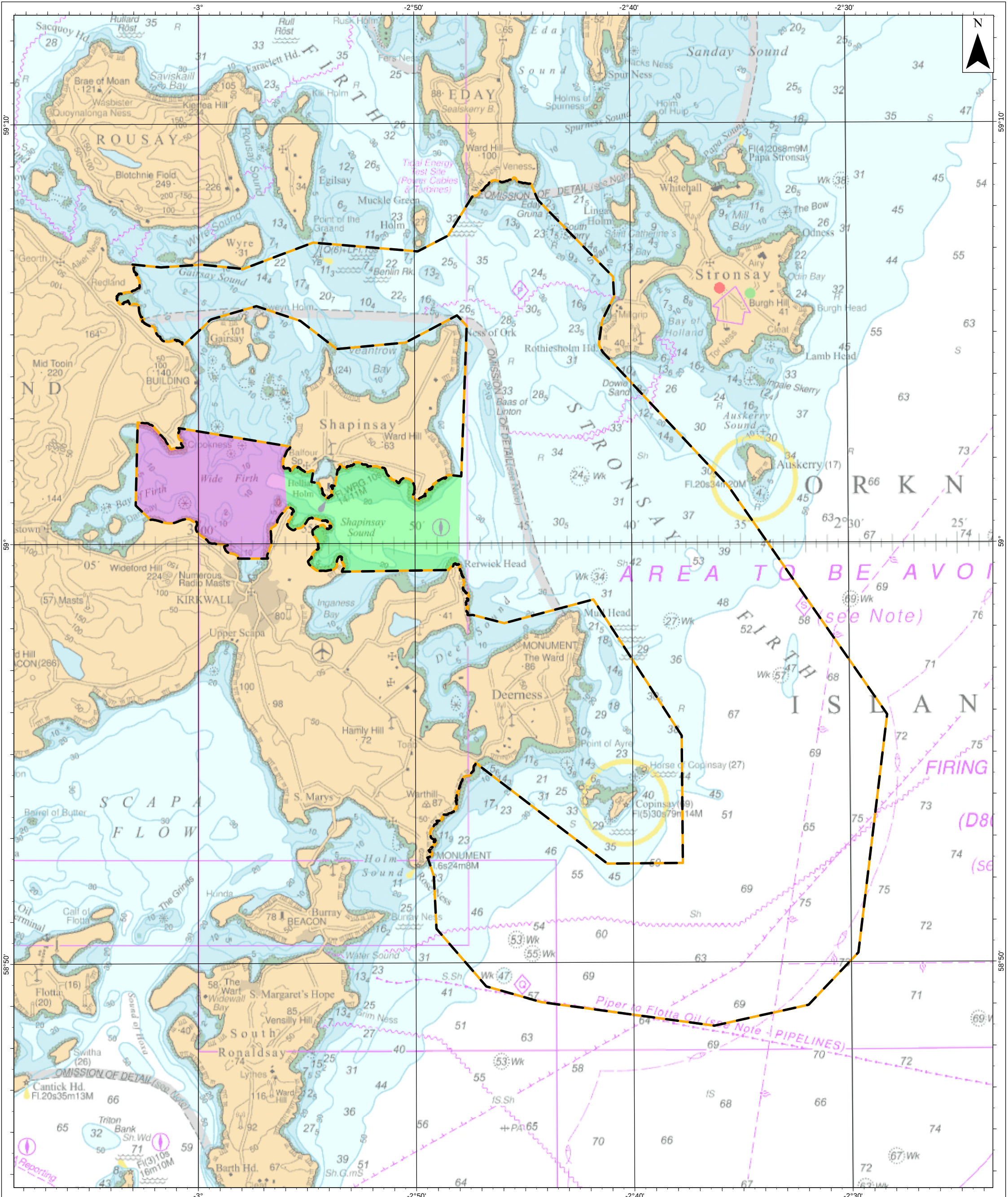
National Marine Fisheries Service (NMFS). 2014. Draft Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammals—Acoustic thresholds for Onset of Permanent and Temporary Threshold Shifts. Federal Register 79: 4672-4673.

NBN Atlas. 2017. Available at: https://spatial.nbnatlas.org/?q=Isid%3ANBNSYS0000005137&qualityProfile=NBN&fq=occurrence_status%3Apresent (Accessed 21/05/2026).

Southall, B. L., Bowles, A. E., Ellison, W. T., Finneran, J. J., Gentry, R. L., Greene, C. R., Kastak, D. 2007. Marine mammal noise exposure criteria: initial scientific recommendations. Aquatic Mammals, 33(4); Special Issue.

SSEN Transmission, 2026. LT597 Eday Orkney Inter-Island Connection Marine Surveys EPS Risk Assessment (A-100782-S05-A-REPT-002).

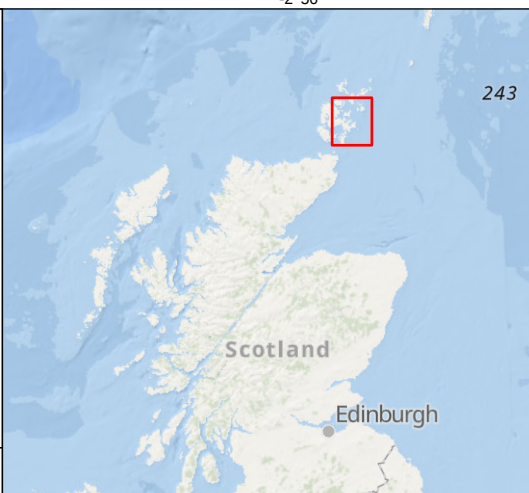
Appendix B



LEGEND:

- Eastern Survey Area
- Western Survey Area
- Full Basking Shark License Area

NOTES:



SPATIAL REFERENCE INFO:
Name: ETRS 1989 UTM Zone 30N;
Datum: ETRS 1989
Projection: Transverse Mercator;
Map Units: Meter

PAGE SIZE: A3
SCALE @ A3: 1:150,000

SCALE BAR:
0 1 2 3 4 5 6 Kilometers

SERVICE LEVEL CREDITS:
Sources: Esri, TomTom, Garmin, GEBCO, National Geographic, NOAA, and the GIS User Community, Esri, GEBCO, Garmin, NaturalVue

PROJ. TITLE: EDAY		PROJ. CODE: LT597/597			
MAP TITLE: BASKING SHARK LICENSE AREA					
MAP STATUS: FOR ISSUE	TASK NUMBER: SSNT-2026-129		REVISION: 01		
01	18/06/26	Issued For Review	SG	GA	AF
REV	DATE	REASON FOR ISSUE	BY	CHK	APP



Scottish & Southern
Electricity Networks



TRANSMISSION

Appendix C

	LT596/597 EDAY BASKING SHARK LICENSE AREA	
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Project	LT596/597 EDAY
Reviewing Organisation	SSEN TRANSMISSION
Data Reference	LT596_SSENT_MARINE_CONSENTS_BASKING_SHARK_LICENCE
Document Revision	1
Projection	GCS WGS 84

VERT_ID	LAT_DD	LONG_DD	LAT_DDM	LON_DDM
1	59.111291	-3.050719	59° 6.677' N	003° 3.043' W
2	59.110163	-3.028821	59° 6.61' N	003° 1.729' W
3	59.111262	-2.997684	59° 6.676' N	002° 59.861' W
4	59.109547	-2.965391	59° 6.573' N	002° 57.923' W
5	59.114887	-2.937819	59° 6.893' N	002° 56.269' W
6	59.119985	-2.911461	59° 7.199' N	002° 54.688' W
7	59.116443	-2.830701	59° 6.987' N	002° 49.842' W
8	59.122637	-2.807267	59° 7.358' N	002° 48.436' W
9	59.138119	-2.788419	59° 8.287' N	002° 47.305' W
Points between 9 and 311 follow MHWS				
311	59.143235	-2.743177	59° 8.594' N	002° 44.591' W
312	59.141759	-2.741959	59° 8.506' N	002° 44.518' W
313	59.136610	-2.737711	59° 8.197' N	002° 44.263' W
314	59.124350	-2.714548	59° 7.461' N	002° 42.873' W
315	59.106096	-2.680106	59° 6.366' N	002° 40.806' W
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317	59.088733	-2.688580	59° 5.324' N	002° 41.315' W
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410	59.075930	-2.687755	59° 4.556' N	002° 41.265' W
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412	58.931802	-2.471127	58° 55.908' N	002° 28.268' W
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414	58.832078	-2.504244	58° 49.925' N	002° 30.255' W
415	58.826914	-2.513846	58° 49.615' N	002° 30.831' W
416	58.821749	-2.523445	58° 49.305' N	002° 31.407' W
417	58.816583	-2.533041	58° 48.995' N	002° 31.982' W
418	58.814567	-2.551114	58° 48.874' N	002° 33.067' W
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422	58.809723	-2.621848	58° 48.583' N	002° 37.311' W
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427	58.815789	-2.704497	58° 48.947' N	002° 42.27' W
428	58.816996	-2.721030	58° 49.02' N	002° 43.262' W
429	58.818201	-2.737565	58° 49.092' N	002° 44.254' W
430	58.821362	-2.758599	58° 49.282' N	002° 45.516' W
431	58.824521	-2.779637	58° 49.471' N	002° 46.778' W
432	58.830257	-2.789129	58° 49.815' N	002° 47.348' W
433	58.835993	-2.798624	58° 50.16' N	002° 47.917' W
434	58.841728	-2.808123	58° 50.504' N	002° 48.487' W
435	58.847463	-2.817625	58° 50.848' N	002° 49.057' W
436	58.868268	-2.819523	58° 52.096' N	002° 49.171' W
437	58.875666	-2.824202	58° 52.54' N	002° 49.452' W
Points between 437 and 1238 follow MHWS				
1238	58.913325	-2.787377	58° 54.8' N	002° 47.243' W
1239	58.912652	-2.785684	58° 54.759' N	002° 47.141' W
Points between 1239 and 1266 follow MHWS				
1266	58.912307	-2.784819	58° 54.738' N	002° 47.089' W
1267	58.873075	-2.686423	58° 52.384' N	002° 41.185' W
1268	58.873190	-2.628659	58° 52.391' N	002° 37.72' W
1269	58.923751	-2.628994	58° 55.425' N	002° 37.74' W
1270	58.977967	-2.696357	58° 58.678' N	002° 41.781' W
1271	58.968716	-2.764912	58° 58.123' N	002° 45.895' W
1272	58.972009	-2.788925	58° 58.321' N	002° 47.336' W
1273	58.971944	-2.792651	58° 58.317' N	002° 47.559' W
Points between 1273 and 1867 follow MHWS				
1867	58.989884	-2.807303	58° 59.393' N	002° 48.438' W
1868	58.989310	-2.889553	58° 59.359' N	002° 53.373' W
Points between 1868 and 3457 follow MHWS				
3457	58.994529	-2.946616	58° 59.672' N	002° 56.797' W
3458	58.994558	-2.969354	58° 59.673' N	002° 58.161' W
Points between 3458 and 3697 follow MHWS				
3697	59.009913	-3.036884	59° 0.595' N	003° 2.213' W
3698	59.015581	-3.048161	59° 0.935' N	003° 2.89' W
3699	59.048599	-3.046770	59° 2.916' N	003° 2.806' W
Points between 3699 and 3883 follow MHWS				
3884	59.046358	-3.015156	59° 2.782' N	003° 0.909' W
3885	59.038993	-2.929219	59° 2.34' N	002° 55.753' W
Points between 3885 and 4400 follow MHWS				
4400	59.029461	-2.911493	59° 1.768' N	002° 54.69' W
4401	59.024962	-2.913008	59° 1.498' N	002° 54.78' W
4402	59.024423	-2.906991	59° 1.465' N	002° 54.419' W

Points between 4402 and 4932 follow MHWS				
4932	59.023566	-2.897423	59° 1.414' N	002° 53.845' W
4933	59.023340	-2.894905	59° 1.4' N	002° 53.694' W
4934	59.029895	-2.892694	59° 1.794' N	002° 53.562' W
Points between 4934 and 6108 follow MHWS				
6108	59.027613	-2.806905	59° 1.657' N	002° 48.414' W
6109	59.027078	-2.797546	59° 1.625' N	002° 47.853' W
6110	59.086864	-2.793066	59° 5.212' N	002° 47.584' W
6111	59.090969	-2.800498	59° 5.458' N	002° 48.03' W
6112	59.080228	-2.840274	59° 4.814' N	002° 50.416' W
6113	59.077707	-2.893233	59° 4.662' N	002° 53.594' W
6114	59.078568	-2.895398	59° 4.714' N	002° 53.724' W
6115	59.079858	-2.898640	59° 4.791' N	002° 53.918' W
6116	59.088887	-2.921349	59° 5.333' N	002° 55.281' W
6117	59.094783	-2.955217	59° 5.687' N	002° 57.313' W
6118	59.094783	-2.955217	59° 5.687' N	002° 57.313' W
6119	59.094783	-2.955217	59° 5.687' N	002° 57.313' W
6120	59.094783	-2.955217	59° 5.687' N	002° 57.313' W
6121	59.089816	-2.988248	59° 5.389' N	002° 59.295' W
6122	59.089806	-2.988371	59° 5.388' N	002° 59.302' W
6123	59.089795	-2.988480	59° 5.388' N	002° 59.309' W
6124	59.089750	-2.988859	59° 5.385' N	002° 59.332' W
6125	59.089749	-2.988869	59° 5.385' N	002° 59.332' W
6126	59.089719	-2.989062	59° 5.383' N	002° 59.344' W
6127	59.089591	-2.989748	59° 5.375' N	002° 59.385' W
6128	59.089590	-2.989749	59° 5.375' N	002° 59.385' W
6129	59.089564	-2.989876	59° 5.374' N	002° 59.393' W
6130	59.089486	-2.990209	59° 5.369' N	002° 59.413' W
6131	59.089471	-2.990268	59° 5.368' N	002° 59.416' W
6132	59.089420	-2.990441	59° 5.365' N	002° 59.426' W
6133	59.089353	-2.990640	59° 5.361' N	002° 59.438' W
6134	59.089293	-2.990798	59° 5.358' N	002° 59.448' W
6135	59.089073	-2.991312	59° 5.344' N	002° 59.479' W
6136	59.089018	-2.991429	59° 5.341' N	002° 59.486' W
6137	59.088769	-2.991914	59° 5.326' N	002° 59.515' W
6138	59.088711	-2.992017	59° 5.323' N	002° 59.521' W
6139	59.088048	-2.993101	59° 5.283' N	002° 59.586' W
6140	59.087971	-2.993215	59° 5.278' N	002° 59.593' W
6141	59.087902	-2.993305	59° 5.274' N	002° 59.598' W
6142	59.079265	-3.011484	59° 4.756' N	003° 0.689' W
Points between 6142 and 6909 follow MHWS				
6909	59.111291	-3.050719	59° 6.677' N	003° 3.043' W