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Ref: Eastern Green Link 2 MS-00011033

Application for Variation of Marine Licence MS-00011033 to Permit Temporary Rock Bag Deposits for Horizontal Directional Drilling (HDD) Duct Protection

Dear Louise,

The Eastern Green Link 2 (EGL2) project is being jointly developed by Scottish and Southern Electricity Networks (SSEN) Transmission (also known, under the licence, as Scottish Hydro Electric Transmission plc (SHE Transmission)) and National Grid Electricity Transmission (NGET). EGL2 is seeking a variation to Marine Licence MS-00011033, granted on 19 May 2025 under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009.

This variation request seeks approval for the use of rock bags as temporary protection for the two HDD ducts within the HDD Exit Pit. The proposed amendment relates specifically to the following section of the Licence:

Part 2 – Particulars
2.4 Description of materials to be used during the Licensed Activity:
Materials to be temporarily used in the course of construction.

As set out in Appendix 1, beneath this covering letter, the use of temporary rock bags is proposed in place of the currently permitted temporary concrete mattresses. The appendix explains the rationale for this change, and demonstrates that the temporary use of rock bags would not introduce any additional environmental impacts or technical risks beyond those already assessed and approved as part of the EGL2 Marine Scheme Environmental Appraisal Report (EAR), Habitats Regulations Appraisal (HRA) and Marine Protected Areas (MPA) Assessment, submitted in support of the original Marine Licence Application. The proposed change represents a significant reduction in the volume of deposits required to temporarily protect the HDD ducts, and hence associated potential environmental impact, compared to that considered by the EAR, HRA and MPA Assessment, and currently consented under the Marine Licence.

In parallel with this variation request, EGL2 has submitted the HDD Method Statement (Document ID PHWH-EGL2-PRYSM-MCM-LF-PLN-Z-0001), as required for Phase 2 of Condition 2.3.6 - Cable Burial Protection Plan (CBPP), to enable the commencement of Phase 2 HDD activities below Mean High Water Springs (MHWS) following its discharge. The HDD Method Statement confirms that rock bags will only be deployed if this Marine Licence variation is approved by Marine Directorate - Licensing Operations Team (MD-LOT). Please note that all other MD-LOT approved consent plans, submitted to discharge Phase 1 of the licence, remain unchanged for Phase 2.

I trust that the information provided is sufficient to allow MD-LOT to vary the Marine Licence. However, should any further information or clarification be required, please do not hesitate to contact me.

Kind regards,

Ashleigh Fenton
EGL2 Marine Consents Manager
For and on behalf of Scottish Hydro Electric Transmission Plc.
Cc: Iain Gatward (Senior Marine Consents Manager, Scottish Hydro Electric Transmission Plc)

Appendix 1 - Application for Variation of MS-00011033 to Permit Temporary Rock Bag Deposits for HDD Duct Protection

EGL2 are preparing for the Phase 2 discharge of the EGL2 Marine Licence (MS-00011033) conditions, for the HDD activities at Sandford Bay. To this end the Project has submitted the HDD Method Statement, as required under Condition 3.2.6 of the licence, for consultation in relation to the HDD works below MHWS.

Under Part 2 (2.4) of the Marine Licence, there is currently an allowance for the temporary deposit of 218 tonnes of concrete mattresses at the HDD duct exit pits (equating to approximately 24 mattresses), to secure the ducts and provide protection between the completion of the HDD activities, and the commencement of the cable pull-in and laying operations. This was based on the realistic worst case design parameter for the temporary HDD exit pit protection, which was assessed by the original EGL2 Marine Scheme EAR.

However, the Principal Contractor (Prysmian Power Link) and their marine installation specialists recommend the use of rock bags to provide temporary protection of the two HDD ducts within the HDD Exit Pit, instead of concrete mattresses. Their recommendation is based on the potential risk of damage to the HDD ducts due to the likely point loading from concrete mattresses, resulting from their rigid nature. Rock bags are more compliant in nature, and will contour around the HDD ducts, thus removing the risk of point loading damage to the newly installed infrastructure.

The following parameters have been identified by the Principal Contractor for the temporary protection of the two ducts in the HDD exit pit using rock bags:

- Up to 10 rock bags per HDD duct (up to 20 bags in total);
- A maximum of 40 tonnes of clean crushed rock material in total (contained within net bags);
- Each rock bag will have a diameter of approximately 1.5-2 m, with a weight of approximately 2 tonnes;
- The rock bags will be installed from a multicat vessel (or similar) using an onboard crane, potentially supported by divers;
- No reduction in navigable water depth is anticipated due to the temporary installation of the rock bags, the rock bags will be positioned within the excavated HDD exit pit and will not protrude above original seabed level; and
- The rock bags will be removed entirely upon the commencement of the cable pull-in activities – permanent protection of the HDD exit pit, ducts and cables will be undertaken following cable installation, and subsequent to discharging Phase 3 of the Marine Licence (Seabed Preparation and Cable Installation).

With regard to navigational safety, the requirement for temporary Aids to Navigation (AtoNs) to mark the HDD exit pit and associated temporary protection will be informed through engagement with Peterhead Port Authority (PPA), the Maritime and Coastguard Agency (MCA), and the Northern Lighthouse Board (NLB). Should a temporary AtoN be required, its type and characteristics will be agreed with PPA and the NLB. The location and nature of the HDD Exit Pit and any temporary protection measures will be promulgated through a Notice to Mariners (NtM), including details of any temporary AtoNs, if installed. If a temporary AtoN is required, its installation and removal would be subject to a Marine Licence exemption under Sections 27 and 28 of the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011, respectively (given it will be approved by the NLB and PPA).

As demonstrated in Table 1 below, the temporary use of rock bags in place of concrete mattresses will significantly reduce the overall volume of seabed deposits, while maintaining an installation methodology

that is entirely consistent with that already assessed by the EAR to support the original Marine Licence application. The proposed rock bag solution results in a lower total tonnage, occupies a smaller spatial seabed footprint within the HDD exit pit, and remains fully recoverable prior to commencement of cable pull-in activities. Importantly, the rock bags will be placed wholly within the excavated HDD Exit Pit and are not anticipated to extend above the seabed, and therefore will not alter seabed morphology, navigational safety, or hydrodynamic conditions beyond those previously assessed.

Given the above, no changes arise that would modify the conclusions of the EGL2 Marine Scheme EAR[1], HRA Report[2], or MPA Assessment[3], as the nature, scale, location and duration of the temporary protection remain within the impact envelope already evaluated for the licensed HDD works. Moreover, the replacement of temporary concrete mattresses with rock bags results in a clear reduction in environmental impact, as the total volume of temporary seabed deposits is significantly lower, the seabed footprint is reduced, and less material is introduced to the marine environment. Rock bags remain fully recoverable and are installed using the same methods previously assessed, ensuring that no new potential environmental impact pathways are created. As such, the proposed variation revised approach produces at worst equal, but likely lower, levels of environmental impact compared to the originally consented method. Accordingly, the use of rock bags in place of concrete mattresses does not give rise to any additional or more significant environmental impacts, does not alter the conclusions of the original assessments, and does not constitute a material departure from the originally assessed temporary HDD Exit Pit protection methods. The proposed change is therefore appropriate for approval under a Marine Licence variation.

Table 1 Comparison of Temporary HDD Duct Protective Measures

HDD Exit Pit Temporary Protection Methodology – Sandford Bay		
Parameter	**Rock Bags**	**Concrete Mattresses**
Total No.	20	8
Total Tonnage	40	72
Dimensions	1.5 m to 2 m diameter	6 m x 3 m x 0.3 m
Recoverability	Fully Recoverable	Fully Recoverable
Status	Temporary	Temporary
Installation	Installed from a multicat vessel using an onboard crane, potentially supported by divers	Installed from a multicat vessel using an onboard crane, potentially supported by divers
Snagging Risk	No anticipated risk as rock bags will sit fully within the Exit Pit excavation	No anticipated risk as mattresses will sit fully within the Exit Pit excavation
Navigation Safety	Potential temporary AtoNs and NtMs with requirements defined through consultation with navigational consultees	Potential temporary AtoNs and NtMs with requirements defined through consultation with navigational consultees

Additionally, the HDD Method Statement submitted to discharge Phase 2 of Condition 3.2.6 of the Marine Licence, clearly states that rock bags will only be used should this Marine Licence variation be approved by MD-LOT. Should this variation not be approved, the HDD Method Statement confirms that the HDD Exit Pit protection will utilise temporary concrete mattresses as currently permitted under MS-00011033, aligned to the parameters detailed in Table 1.

EGL2 propose the following wording, as per Table 2, be adopted within the varied Marine Licence if the variation is successfully approved.

[1] *AECOM, 2022. Eastern Green Link 2 - Marine Scheme. Environmental Appraisal Report.*
[2] *AECOM, 2022. Eastern Green Link 2 - Marine Scheme. Environmental Appraisal Report. Volume 3. Appendix 8.2 - Habitats Regulations Assessment Report*
[3] *AECOM, 2022. Eastern Green Link 2 - Marine Scheme. Environmental Appraisal Report. Volume 3. Appendix 8.3 - Marine Protected Area (MPA) and Marine Conservation Zone (MCZ) Assessment*

No other conditions under the Marine Licence require amendment based on the proposed variation request.

Table 2 MS-00011033 Proposed Amendments

Proposed amendments to Marine Licence MS 00011033		
Section	**Current Wording**	**Proposed Wording**
Part 2 (2.4)	*Materials to be temporarily used in the course of construction:* *Concrete mattresses at Horizontal Directional Drilling duct exit pits: 218 tonnes.*	*Materials to be temporarily used in the course of construction:* *Rock Bags at Horizontal Directional Drilling duct exit pits: 40 tonnes.*