



Inch Cape
OFFSHORE LIMITED

**Inch Cape Offshore Transmission Works:
Marine Licence (06782/19/0)
Variation Application Report**

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Acronyms & Abbreviations

Acronym	Term
AA	Appropriate Assessment
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
ES	Environmental Statement
ICOL	Inch Cape Offshore Limited
OfTW	Offshore Transmission Works
OSP	Offshore Substation Platform
WTG	Wind Turbine Generator

Glossary

Defined Term	Meaning
The 2010 Act	Marine (Scotland) Act 2010
Development	The Inch Cape Offshore Wind Farm (the Wind Farm) and Offshore Transmission Works (OfTW) being developed by Inch Cape Offshore Limited (ICOL)
Development Area	The area for the Wind Farm, within which all Wind Turbine Generators (WTGs), inter-array cables, interconnector cables, Offshore Substation Platforms (OSPs) and the initial part of the Offshore Export Cable and any other associated works must be sited. As stipulated in the Crown Estate agreement for lease.
Inch Cape Offshore Wind Farm/ Wind Farm	A component of the Development, comprising wind turbines and their foundations and substructures, and inter-array cables.
Offshore Export Cable	The subsea, buried or protected electricity cables running from the offshore wind farm substation to the landfall and transmitting the electricity generated to the onshore cables for transmission onwards to the onshore substation and the electrical grid connection.
Offshore Export Cable Corridor/ Export Cable Corridor	The area within which the Offshore Export Cables will be laid from the OSP and up to Mean High Water Springs.
Offshore Transmission Works (OfTW)	The Offshore Export Cable and OSPs. This includes all permanent and temporary works required.
Onshore Transmission Works (OnTW)	All works required for the onshore element of the Project, typically including the onshore substation, cable transition pits, cable jointing pits, underground electricity transmission cables connecting to the Onshore Substation and further underground cables required to facilitate connection to the national grid. This includes all permanent and temporary works required.

Executive Summary

Inch Cape Offshore Limited (ICOL) intends to request a variation to the Inch Cape Offshore Transmission Works (OfTW) Marine Licence 06782/19/0 (dated 17th June 2019) under section 30(7) of the Marine (Scotland) Act 2010 (the 2010 Act). The proposed changes (the Proposed Variation) were identified following further detailed design and are required in order to successfully install the Offshore Export Cables.

The Proposed Variation will capture the following changes to the OfTW Marine Licence (06782/19/0):

- Changes to temporary and permanent deposit quantities; and
- Revision of the Offshore Export Cable Corridor Coordinates.

This document has been produced to provide the supporting information to vary the Inch Cape Offshore Transmission Works (OfTW) Marine Licence 06782/19/0.

A Screening Opinion under the Electricity Works Environmental Impact Assessment (EIA) Regulations 2017 and the Marine Works EIA Regulations 2017 was made by Scottish Ministers on 6 March 2023. This concluded that the Scottish Ministers were of the view that the Proposed Variation to the Inch Cape OfTW Marine Licence 06782 was not an EIA project under the 2017 Electricity Works Regulations and 2017 Marine Works Regulations and, therefore an EIA is not required to be carried out in respect of this Proposed Variation. Furthermore, no new or materially different impacts have been identified in the HRA which could lead to an increase in significant effects on designated features. Therefore, there is no change required to the HRA and the existing AA remains valid and robust.

This document has been produced to provide the supporting information to inform the request for the Proposed Variation.

1 Introduction

1.1 Background

- 1 The Inch Cape Offshore Wind Farm (the Wind Farm) and Offshore Transmission Works (OfTW), hereafter referred to as The Development, is being developed by Inch Cape Offshore Limited (ICOL) (see Figure 1.1).

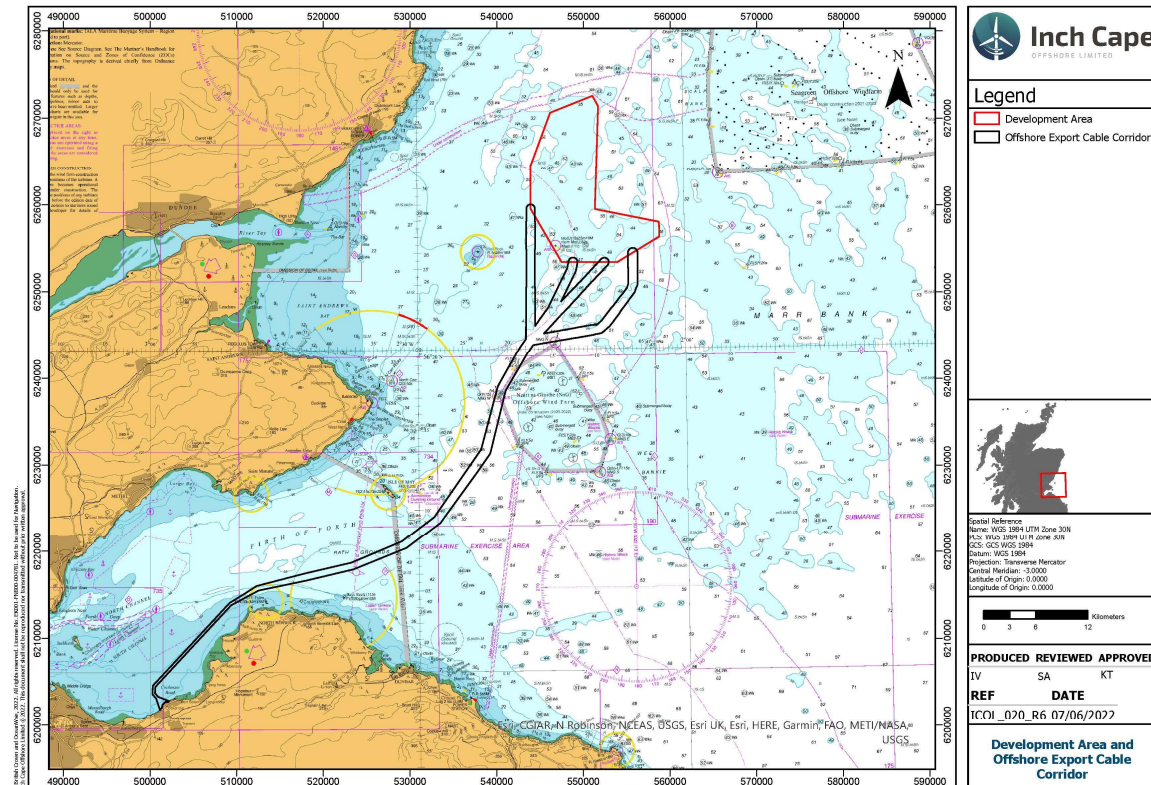


Figure 1.1: Inch Cape Offshore Development Area and Current Offshore Export Cable Corridor

- 2 In 2014, the Scottish Ministers granted ICOL Section 36 and Marine Licence consents for the construction and operation of an offshore wind farm and a marine licence for the construction and operation of offshore transmission works. The licences granted to ICOL in 2014 (along with those for other Forth and Tay projects, Seagreen Alpha and Bravo and Neart na Gaoithe) were subject to a petition for judicial review in early 2015. A decision was made by the UK Supreme Court in November 2017 to uphold the Scottish Ministers' decisions to grant the offshore consents.



- 3 In 2018, ICOL submitted a new application with a revised design that would allow the development of a project that could utilise progressions in technology since the 2014 consent. Section 36¹ and Marine Licence Consents for the revised design were granted by Scottish Ministers in 2019.
- 4 The revised Marine Licence (06782/19/0) (dated 17 June 2019) ('the Licence') was granted for the offshore transmission infrastructure connecting the landfall location, located near Cockenzie, East Lothian, and the Inch Cape Offshore Wind Farm which is located approximately 15-22 km off the Angus coastline, to the east of the Firth of Tay (the OfTW). The revised Marine Licence still provides the option of four export corridors from the Development Area, but only allowing for up to two export cables.
- 5 A Screening Opinion under the 2017 Electricity Works Regulations and the 2017 Marine Works EIA Regulations was made by Scottish Ministers on 6 March 2023. This concluded that the Scottish Ministers were of the view that the Proposed Variation to the Inch Cape OfTW Marine Licence 06782 was not an EIA project under the 2017 Marine Works Regulations or the 2017 Electricity Works Regulations, therefore, an EIA is not required to be carried out in respect of this Proposed Wind Farm Variation.

1.2 Intention to Vary Existing Consents

- 6 ICOL requests a variation to the existing Marine Licence Number: 06782/19/0 in accordance with section 30(7) of the Marine (Scotland) Act 2010 (2010 Act).
- 7 The Proposed Variation is required in order to successfully install the two Offshore Export Cables taking into account the results of further site investigations and detailed engineering design. The Proposed Variation will capture the following changes to the OfTW Marine Licence (06782/19/0):
- Changes to temporary and permanent deposit quantities; and
 - Revision of the Offshore Export Cable Corridor Coordinates.
- 8 The Proposed Variation has been considered and whether these changes could result in significant effects which are new or materially different to those of the consented OfTW.

¹Since the consent for the revised design was received, ICOL has successfully sought two variations to the Inch Cape Offshore Wind Farm Section 36 Consent and Marine Licence 06781/19/0. A separate variation application for these consents, to optimise wind farm efficiency and enable utilisation of the best available technological solution, has been submitted to Marine Scotland Licensing and Operations Team (MS-LOT) and is currently pending.



1.3 Scope of this Document

9 This document has been produced to provide the supporting information to inform the request for the Proposed Variation, and contains the following:

- Details of the Proposed Variation (Section 2);
- Consideration of Environmental Effects (Section 3);
- Habitats Regulation Assessment (HRA) (Section 4); and
- Summary and Conclusion (Section 5).

2 Project Description and Proposed Variation

2.1 Existing Project Characteristics

2.1.1 Description of Development

10 The Marine Licence (06782/19/0) describes the Consented Development Offshore transmission infrastructure comprised of:

1. No more than two OSP topsides (health and safety equipment, electrical and control system, communication equipment, workshop, emergency, accommodation and welfare facilities, heli-hoist platform, cranes and small power generation) and ancillary equipment, such as J-tubes and access facilities. Substructure and foundation design for the OSP will be chosen from the following options:

- a. Jacket with pin piles;*
- b. Jacket with suction piles;*
- c. Monopile;*
- d. Jacket with gravity base; or*
- e. Gravity base structures.*

2. No more than 180 km of marine cable, including connections between OSP and no more than two export cables, each export cable measuring no more than 83.3 km; and

3. Scour and cable protection.

11 Table 2.1 details the permitted deposits under Licence 06782/19/0.

Table 2.1 Summary of permitted deposits under Licence 06782/19/0.

Type of Deposit	Quantity permitted under Licence 06782/19/0
Steel / Iron	Up to approx. 10,000 tonnes
Plastics / Synthetics	Up to approx. 4,400 m ²
Concrete	Up to approx. 16,000 m ³
Sand	Up to approx. 22,000 m ³
Stone / Rock / Gravel	Size range 15 – 200 mm. Up to approx. 220,000 m ³
Concrete bags / Mattresses	Up to approx. 150 mattresses Dimensions 6 x 3 x 0.3 m Volume = approx. 800 m ³
Cable	Length approx. 180,000 m/180km

2.2 Proposed Variation

12 The Proposed Variation will capture the following:

- Changes to temporary and permanent deposit quantities; and
- Revision of the Offshore Export Cable Corridor Coordinates.

2.2.1 Changes to temporary and permanent deposit quantities

13 Currently there is limited scope within the existing individual consented cable length (83.3 km) to divert the Offshore Export Cables around challenging ground conditions or to deviate from the centre line of the Offshore Export Cable Corridor. Therefore, ICOL are seeking to utilise the full allowable deposit within the Marine Licence of up to 180 km of cable between landfall and the Offshore Substation Platform (OSP) location.

14 The Proposed Variation is that the wording of the Marine Licence is updated in Section 2 (Part 2 – The Works), paragraph 2, to:

2. No more than 180 km of marine cable, including connections between the OSP(s) and landfall connections ~~and no more than two export cables, each export cable measuring no more than 83.3 km.~~

15 The use of the full allowable deposit is for micro-siting cables within the Corridor only.

16 Updates to the volumes of deposits following detailed engineering are also proposed (see Table 2.2). Following detailed design, it is anticipated that an increase in the quantity of mattresses is required for cable crossings (see Section 7.9.3, para 102 of the 2018 EIA Report (EIAR) detailing that this would be determined in agreement with the third party).

Table 2.2: Updated Quantities of Deposits

Type of Deposit	Quantity permitted under Licence 06782/19/0	Quantity Proposed
Steel / Iron	Up to approx. 10,000 tonnes	Unchanged
Plastics / Synthetics	Up to approx. 4,400 m ²	Unchanged
Concrete	Up to approx. 16,000 m ³	Unchanged
Sand	Up to approx. 22,000 m ³	Unchanged
Stone / Rock / Gravel	Size range 15 – 200 mm. Up to approx. 220,000 m ³	Unchanged
Concrete bags / Mattresses	Up to approx. 150 mattresses Dimensions 6 x 3 x 0.3 m Volume = approx. 800 m ³	Up to approx. 500 mattresses Dimensions 6 x 3 x 0.3 m Volume = approx. 2,700 m ³
Cable	Length approx. 180,000 m/180km	Unchanged



Assumptions

1. The statement "materials to be deposited below MHWS" only includes subsea elements such as cables, substructures and foundations and any cable or scour protection (does not consider OSP topsides).
 2. Trenching is not included in this table but detailed within the 2018 EIAR.
 3. Dredging and drilling works are not included in this table but are detailed within the 2018 EIAR.
 4. Assuming that any plastics/synthetics are those exposed to the environment (due to m² being the quantity quoted).
 5. The quantities of rock placement/mattresses for cable are mutually exclusive maximums (i.e., it is unlikely we would use the maximum of both).
 6. Maximum quantities of steel and concrete cover structures based primarily out of each material e.g., steel jackets would utilise significantly less concrete than a concrete gravity base.
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- 17 Consideration of environmental effects arising from the changes to temporary and permanent deposit quantities is provided in Section 3.

2.2.2 Revision of the Offshore Export Cable Corridor Coordinates

- 18 The Proposed Variation is required to revise the current Offshore Export Cable Corridor coordinates to also include the area from the boundary of the Development Area to the location of the proposed Offshore Substation Platform (OSP) (see Table 2.3 and Figure 2.1 below).



Table 2.3: Proposed Alterations to the Location of the Works in Marine Licence 06782

ID	Longitude	Latitude	ID	Longitude	Latitude
1	002°16.76' W	56°28.24' N	62	002°58.19' W	55°58.22' N
2	002°16.87' W	56°21.45' N	63	002°58.25' W	55°58.22' N
3	002°15.42' W	56°22.54' N	64	002°58.28' W	55°58.22' N
4	002°13.18' W	56°25.03' N	65	002°58.31' W	55°58.20' N
5	002°13.05' W	56°25.38' N	66	002°58.44' W	55°58.12' N
6	002°12.03' W	56°25.37' N	67	002°58.46' W	55°58.10' N
7	002°12.02' W	56°25.37' N	68	002°58.49' W	55°58.09' N
8	002°12.22' W	56°24.83' N	69	002°58.50' W	55°58.08' N
9	002°13.91' W	56°22.95' N	70	002°58.52' W	55°58.07' N
10	002°09.69' W	56°25.35' N	71	002°58.54' W	55°58.06' N
11	002°09.35' W	56°25.55' N	72	002°58.54' W	55°58.06' N
12	002°09.08' W	56°25.62' N	73	002°58.54' W	55°58.05' N
13	002°08.87' W	56°25.61' N	74	002°58.55' W	55°58.05' N
14	002°08.67' W	56°25.55' N	75	002°58.59' W	55°58.03' N
15	002°08.54' W	56°25.44' N	76	002°58.62' W	55°58.02' N
16	002°08.53' W	56°25.35' N	77	002°58.63' W	55°58.02' N
17	002°08.53' W	56°25.30' N	78	002°58.63' W	55°58.01' N
18	002°08.66' W	56°25.16' N	79	002°58.64' W	55°58.00' N
19	002°15.88' W	56°20.98' N	80	002°58.65' W	55°57.99' N
20	002°09.88' W	56°21.52' N	81	002°58.65' W	55°57.97' N
21	002°06.53' W	56°23.73' N	82	002°58.65' W	55°57.96' N
22	002°06.38' W	56°23.96' N	83	002°58.64' W	55°57.93' N
23	002°06.35' W	56°25.73' N	84	002°58.64' W	55°57.92' N
24	002°06.35' W	56°25.93' N	85	002°58.65' W	55°57.89' N
25	002°06.31' W	56°26.03' N	86	002°58.66' W	55°57.87' N
26	002°06.20' W	56°26.11' N	87	002°58.67' W	55°57.86' N
27	002°06.06' W	56°26.17' N	88	002°58.68' W	55°57.85' N
28	002°05.84' W	56°26.21' N	89	002°58.68' W	55°57.85' N
29	002°05.63' W	56°26.19' N	90	002°58.72' W	55°57.81' N
30	002°05.46' W	56°26.13' N	91	002°58.72' W	55°57.81' N
31	002°05.36' W	56°26.06' N	92	002°58.73' W	55°57.80' N
32	002°05.35' W	56°26.06' N	93	002°58.77' W	55°57.77' N
33	002°05.28' W	56°25.93' N	94	002°58.80' W	55°57.75' N
34	002°05.33' W	56°23.94' N	95	002°58.81' W	55°57.74' N
35	002°05.64' W	56°23.49' N	96	002°58.86' W	55°57.71' N
36	002°08.49' W	56°21.39' N	97	002°58.90' W	55°57.68' N
37	002°09.49' W	56°20.96' N	98	002°59.32' W	55°58.39' N
38	002°17.08' W	56°20.27' N	99	002°59.70' W	55°58.64' N
39	002°17.74' W	56°19.76' N	100	002°59.73' W	55°58.67' N
40	002°20.22' W	56°17.42' N	101	002°59.70' W	55°59.18' N
41	002°22.06' W	56°13.47' N	102	002°55.88' W	56°01.46' N
42	002°27.63' W	56°09.22' N	103	002°51.14' W	56°04.30' N
43	002°31.45' W	56°07.65' N	104	002°49.55' W	56°04.84' N
44	002°37.34' W	56°06.34' N	105	002°48.16' W	56°05.33' N
45	002°42.62' W	56°05.65' N	106	002°42.77' W	56°06.10' N
46	002°47.92' W	56°05.05' N	107	002°37.58' W	56°06.75' N
47	002°50.98' W	56°04.15' N	108	002°31.96' W	56°08.06' N
48	002°51.38' W	56°03.92' N	109	002°28.31' W	56°09.59' N



ID	Longitude	Latitude	ID	Longitude	Latitude
49	002°55.62' W	56°01.38' N	110	002°23.03' W	56°13.77' N
50	002°55.94' W	56°01.19' N	111	002°21.14' W	56°17.62' N
51	002°59.44' W	55°59.10' N	112	002°20.90' W	56°17.88' N
52	002°59.45' W	55°58.72' N	113	002°18.60' W	56°20.10' N
53	002°59.10' W	55°58.49' N	114	002°17.90' W	56°20.65' N
54	002°57.93' W	55°58.25' N	115	002°17.71' W	56°28.70' N
55	002°58.03' W	55°58.22' N	116	002°17.64' W	56°28.83' N
56	002°58.07' W	55°58.20' N	117	002°17.47' W	56°28.93' N
57	002°58.07' W	55°58.20' N	118	002°17.23' W	56°28.96' N
58	002°58.07' W	55°58.20' N	119	002°17.22' W	56°28.96' N
59	002°58.12' W	55°58.19' N	120	002°17.23' W	56°28.70' N
60	002°58.17' W	55°58.21' N	121	002°16.76' W	56°28.24' N
61	002°58.17' W	55°58.21' N			

Proposed Extended Cable Corridor					
1	002°12.03' W	56°25.37' N	6	002°17.23' W	56°28.70' N
2	002°13.05' W	56°25.38' N	7	002°17.22' W	56°28.96' N
3	002°13.81' W	56°25.38' N	8	002°14.53' W	56°28.92' N
4	002°14.51' W	56°26.06' N	9	002°14.29' W	56°28.88' N
5	002°16.76' W	56°28.24' N	10	002°14.12' W	56°28.78' N

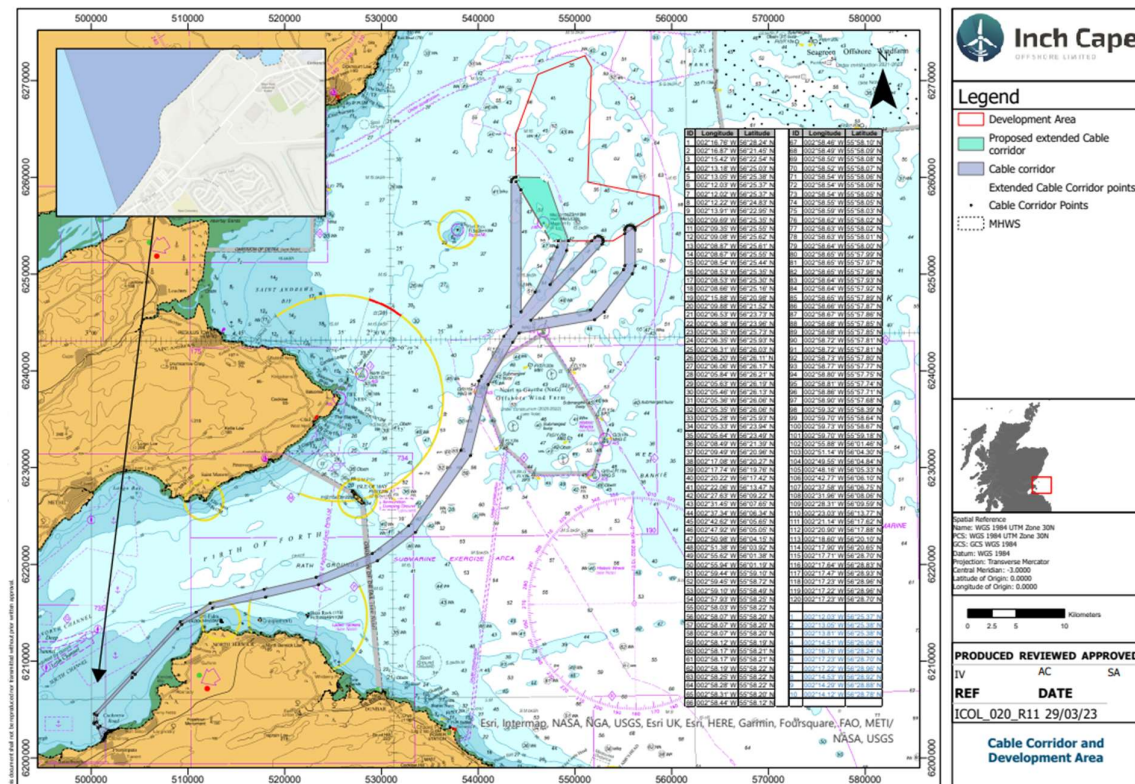


Figure 2.1 Proposed Revised Offshore Export Cable Corridor



- 19 The maximum total length of Offshore Export Cable, 180 km, is unchanged by the change to Offshore Export Cable Corridor. The Offshore Export Cable Corridor will extend into the Development Area which, as per the Project Description extract² below, was defined as having the initial part of the Offshore Export Cable.

"The Development Area is defined as the area which includes proposed WTGs, inter-array cables, OSPs and initial part of the Offshore Export Cable (part of the OfTW component) and any other associated works."

- 20 All other parameters remain unchanged by the Proposed Variation to the Offshore Export Cable Corridor coordinates and therefore no further information and consideration of environmental effects are required within this report in relation to this element of the Proposed Variation.

2.3 Screening Opinion Consultation

- 21 Following a review of the 2013 Environmental Statement (ES) and 2018 EIAR, and further consideration of environmental effects arising from the Proposed Variation (Section 2.2), no further significant impacts were identified to arise from the Proposed Variation.
- 22 The Scottish Ministers, in their Screening Opinion (6 March 2023) were of the view that the Proposed Variation to the Inch Cape OfTW Marine Licence 06782 was not an EIA project under the 2017 Electricity Works Regulations and 2017 Marine Works Regulations and, therefore, an EIA is not required to be carried out in respect of this Proposed Variation.
- 23 Table 2.4 provides a summary of the consultation responses received for the screening request and, where relevant, how these have been addressed in this report.

Table 2.4: Summary of Screening Consultation

Consultee	Consultee Response Summary	ICOL Response
Aberdeenshire Council	<p>The Aberdeenshire Council offers the following observations:</p> <ul style="list-style-type: none">• The interests of the Aberdeenshire Council are limited to those effects or impacts which would occur within the Aberdeenshire Council Area• Aberdeenshire Council agree that the development would fall under Schedule 2 paragraph 2 as it is stated within the Screening report. The scope of the screening therefore relates to differential impact of the variation, as opposed to reassessing the development as a whole• The variation falls largely within the previously agreed parameters, with the proposed changes to cable lengths, an increase of concrete bags/mattresses and revised offshore export cable corridor coordinates,	<p>Noted.</p> <p>This variation will not impact the visual element of the project.</p>

² ICOL 2018, Inch Cape Wind Farm EIAR, Chapter 7.



Consultee	Consultee Response Summary	ICOL Response
	<p>Bearing in mind the above, it is considered that the scope for comment is limited. As such, Aberdeenshire Council would agree that the potential environmental impacts of the variation are unlikely to be so widespread as to warrant the submission of a complete EIAR.</p> <p>This screening opinion is offered without prejudice to the assessment of any future application or further screening requests. I would highlight that Seascape, landscape and Visual Impact of the development would remain a key consideration for Aberdeenshire Council and as such the variation application should be supported by appropriate information in respect of this matter.</p>	
Angus Council	<p>Angus Council is satisfied that the S36 variation proposal would not result in impacts of significance that are new or materially different to those of the consented Inch Cape Project.</p> <p>Angus Council would be minded to accept the conclusions presented in the screening report.</p>	<p>Noted.</p> <p>No further information requested.</p>
Dundee City Council	<p>Thank you for your email consultation. I can advise that Dundee City Council has no comment.</p>	<p>Noted.</p> <p>No further information requested.</p>
East Lothian Council (ELC)	<p>The Variation proposes an increase in concrete bags / mattresses from up to approximately 150 mattresses with a volume of up to 800 m³, to up to approximately 500 mattresses with a volume of 2,700 m³. This will increase the CO₂ emissions of the project. The global climate is a sensitive receptor. We would suggest that information be provided on greenhouse gas emissions and any proposed mitigation, as there does not appear to be any information given on this aspect in the Screening Report. This will allow consideration of whether or not this is significant, including reference to meeting Scottish and UK short and long term greenhouse gas emission targets. If there is mitigation proposed for the emissions, this could be taken into account in deciding whether or not they are significant.</p> <p>The Screening Report considers Habitat Regulation Appraisal, which can also be relevant for EIA. The Screening Report notes that a review of existing consents relevant to the proposed variation has been carried out. This review and subsequent assessment were undertaken with particular regard to the sensitivities of the geographical area that may be affected through a</p>	<p>Noted.</p> <p>The objective of the Inch Cape Offshore Wind Farm is to generate a renewable source of electricity, and to contribute overall to a reduction in Scotland's greenhouse gas emissions. As per the 2021 Carbon Balance Assessment, the Projects annual greenhouse gas emissions saving from displacing gas-fired generation is predicted to be 1.43 Metric tonnes of CO₂ per year. This is equivalent to a reduction of 3.1% of the annual total greenhouse gas emissions in Scotland (based upon 2019 records).</p> <p>It can be clearly seen that the project will not only be of net benefit to Scottish Government's Net Zero target and support the work</p>



Consultee	Consultee Response Summary	ICOL Response
	<p>review of relevant designated sites. These sites include European Sites within or partly within East Lothian, namely the Firth of Forth SPA and Forth Islands SPA, as well as the Outer Firth of Forth and St Andrews Bay Complex. The Screening Report notes that AA considered that impacts during construction and operation of the export cables may arise on the Outer Firth of Forth and St Andrews Bay Complex SPA from direct disturbance or displacement, indirect disturbance of seabed habitats and/or prey species of seabirds and loss of seabed habitats, and that part of this SPA was overlapped by the Offshore Export Cable Corridor. The Screening Report reports the conclusion of the AA of the revised design, dated 14/03/2019 that “there will be no adverse effects, either from the project alone or in combination with other plans and projects, on the site integrity on any designated site, including the Outer Firth of Forth and St Andrews Bay Complex SPA, where mitigation is applied in line with the conditions set out in the Marine Licence”. This assessment was dated 14/03/2019, which is now over three years ago. The Screening Report states that no new or materially different impacts have been identified which could lead to an increase in significant effects on HRA features. The Council does not have the expertise to assess this claim. The report does not consider whether there have been any relevant changes to the SPA features. We value the biodiversity of our SPAs, and also the marine mammals which visit our shores, and so would support the views of NatureScot on this matter</p>	<p>undertaken in declaration of the Climate Emergency, but that any greenhouse gas emissions will be lower than those that might have arisen from the original application, and therefore no significant impact from greenhouse gas emissions will result from the Proposed Variation (and overall there remains a significant beneficial CO² impact as a result of the varied project).</p> <p>Any minor increase in CO² emissions that may result from the small increase in concrete production required by this variation are negligible in the context of the overall carbon balance of the project which demonstrated a considerable net reduction in CO² over the lifetime of the project. As such it is considered that no significant impacts will arise in respect of greenhouse gas emissions from this variation.</p> <p>Within the Screening Opinion, MS-LOT note that Scottish Ministers are content that the increase in carbon dioxide emissions from the Proposed Works are unlikely to have significant adverse effects on the environment and therefore an EIA is not required to support the variation application.</p>
Fife Council	<p>Having examined the details of the proposed variation to the Inchcape Offshore Windfarm offshore transmission work, I can confirm that Fife Council is satisfied that the proposed variation would not result in impacts, in relation to the interests of Fife, of significance that are new or materially different to those of the approved document.</p>	<p>Noted.</p> <p>No further information requested.</p>
HES	<p>We understand that the screening relates to the</p>	<p>Noted.</p>



Consultee	Consultee Response Summary	ICOL Response
	variation to the Marine Licence (06782/19/0) for the Inch Cape Offshore Transmission Works. The proposed variation relates to a change to deposit quantities and a revision of the Offshore Export Cable Corridor Coordinates. We note that the assessment states that there will be no further significant impacts from the proposals because of the variation, and we are content to agree with this assessment regarding our interests. We therefore have no further comments to make for the proposals.	No further information requested.
NatureScot	<p>We have reviewed the applicant's Variation Report (IC02-INT-EC-OFL-003-INC-RPT-001/Revision 0). We agree that:</p> <ul style="list-style-type: none">• No further significant effects arise as a result of the proposed variation; and• No new or materially different impacts have been identified that could lead to increased effects on natural heritage receptors. <p>We therefore advise Marine Scotland that the proposed variation does not require further EIA in relation to any receptor within NatureScot's remit.</p>	<p>Noted.</p> <p>No further information requested.</p>
Scottish Borders Council	We do not intend to offer any comment on the consultation as it has little direct effect on the Scottish Borders.	<p>Noted.</p> <p>No further information requested.</p>
SEPA	<p>We have no comments to make on this application as any applications which are purely within the marine environment, including at any stage of EIA falls below our consultation thresholds. Please refer to Section 2.2 of our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations.</p> <p>Please consider our standing advice in Section 3 and Table 1 as SEPA's views and consultation response, where relevant. If you are seeking advice on something specific that meets our thresholds for consultation, then please reconsult us specifying what advice you require.</p>	<p>Noted.</p> <p>No further information requested.</p>

3 Consideration of Environmental Effects

24 Section 3 provides information and consideration of environmental effects arising from the Proposed Variation. The following information was provided in the report³ submitted in support of the Screening Request. Consultees comments detailed in Table 2.4 were provided in response to this information. Following consultation, no additional information is considered to be required to demonstrate that no significant environmental effects will arise from the proposed works.

3.1.1 Temporary and permanent deposit quantities (Cables)

25 The assessment of impacts in relation to the installation and operation of two offshore export cables of up to 83.3 km in length was scoped out of the 2018 EIAR for all receptors as it represented a reduction in the design envelope from that already assessed in the 2013 ES and included in the 2014 consent.

26 Within the 2013 ES, the design envelope included up to six offshore export cables up to 83.3 km in length (installed in separate trenches). All assessments found the impacts associated with the installation, operation, and decommissioning of the six cables to be not significant.

27 The proposal to use the full allowable deposit of Offshore Export Cables is to allow for micro-siting cables within the Offshore Export Cable Corridor and the OSPs. Therefore, it is considered that the use of the full allowance under the allowable deposits for cables (i.e., 180 km) will not constitute a significant impact and the conclusions of all relevant assessments remain valid.

28 The assessment of impacts in relation to the use of rock protection for two offshore export cables, each up to 83.3 km in length, was scoped out of the 2018 EIAR for all receptors as it represented a reduction in the design envelope over that assessed in the 2013 ES and subsequently consented in 2014. The maximum footprint of effect considered in Scoping was 0.4 km².

29 Within the 2013 ES, the design envelope included up to six offshore export cables, each up to 83.3 km in length, installed in separate trenches and protected by Stone / Rock / Gravel. The footprint of rock protection within the 2013 ES was considered to be up to 0.6 km², with a total volume of up to 422,200 m³ of Stone / Rock / Gravel in the application. The increase in concrete mattresses equates to an area <0.01 km². All assessments found the impacts associated with the presence of the maximum possible extent of rock protection along the export cables to be not significant.

30 Therefore, it is considered that the use of up to 220,000 m³ of Stone / Rock / Gravel, as already permitted under the Licence, to protect the export cables (equating to a footprint of 0.22 km²) and the increase in concrete mattresses (equating to a revised footprint <0.01 km²) will not exceed the maximum footprint of effect considered in Scoping of 0.4 km², and therefore will not constitute a significant impact to any receptor group and the conclusions of all relevant assessments remain valid.

³ Inch Cape Offshore Limited, 2022. Inch Cape Offshore Transmission Works: Marine Licence (06782/19/0). Variation Screening Request and Supporting Information.

3.1.2 Cumulative considerations

- 31 Following a review of existing environmental effects, the proposed changes are not anticipated to have significant environmental effects and no new or materially different impacts have been identified, therefore no change in cumulative or in-combination effects is anticipated.

4 Habitats Regulation Assessment (HRA)

- 32 As with the initial application, it is recognised that elements of the work may be undertaken within the Outer Firth of Forth and St Andrews Bay Complex SPA. Construction impacts on the SPA arising from the installation and operation of the offshore export cable infrastructure were considered within an Appropriate Assessment (AA) of the Revised Design dated 14/03/2019. The AA concluded that there will be no adverse effects, either from the project alone or in combination with other plans and projects, on the site integrity of any designated site, including the Outer Firth of Forth and St Andrews Bay Complex SPA (then a pSPA), where mitigation is applied in line with the conditions set out in the Marine Licence.
- 33 Of relevance to this Proposed Variation, the AA considered the following:
- That impacts during construction and operation of the export cables may arise on the Outer Firth of Forth and St Andrews Bay Complex SPA from direct disturbance or displacement, indirect disturbance of seabed habitats and/or prey species of seabirds, and loss of seabed habitats;
 - That c. 0.7% of the SPA area is overlapped by the Offshore Export Cable Corridor;
 - That <0.1% of the seabed area within the SPA would be disturbed by cable laying activities;
 - That <0.01% of the SPA area would be affected by rock protection materials; and
 - That <0.0001% of the SPA would be affected by temporary habitat disturbance associated with operation and maintenance activities per annum.
- 34 Under the Proposed Variation, no increases will occur in the percentage areas of the SPA affected over those considered in the AA. Furthermore, no new or materially different impacts have been identified which could lead to an increase in significant effects on HRA features. Therefore, there is no change required to the HRA and its conclusions remain valid. NatureScot has confirmed their agreement on this position in their response to the Scoping Opinion consultation (Table 2.4).

5 Summary and Conclusion

- 35 The Proposed Variation does not give rise to any new or materially different impacts and therefore does not require EIA, as confirmed by MS-LOT within the Screening Opinion (6 March 2023). However, supporting information for this variation was provided in Section 3 and 4. Table 5.1 provides the summary of findings in relation to the Variation Request.

Table 5.1 Summary of Environmental Effects Review

Variation	Change to existing assessment conclusions	Summary Justification
Temporary and permanent deposit quantities	No	<p>The proposed cable length is within the permitted deposits stated in the Marine Licence and will be less than the total cable length proposed in the 2013 EIA which concluded no significant impact. As such the conclusions of the existing assessments remain valid for this element of the Proposed Variation.</p> <p>The use of rock protection, as already permitted under the Licence, to protect the export cables (equating to a footprint of 0.22 km²) and the increase in concrete mattresses (equating to a revised footprint <0.01 km²) will not exceed the maximum footprint of effect considered in Scoping of 0.4 km². As such the conclusions of the existing assessments remain valid for this element of the Proposed Variation.</p>
Revision of Offshore Export Cable Corridor Coordinates	No	<p>All other parameters remain unchanged by the Proposed Variation to the Offshore Export Cable Corridor coordinates and therefore no further information and consideration of environmental effects is required within this report. As such the conclusions of the existing assessments remain valid for this element of the Proposed Variation.</p>

- 36 The proposed change in text in respect of the Variation is provided in Table 5.2 with the proposed amendments of quantities summarised in Table 5.3. The revised coordinates are provided in Table 5.4.

Table 5.2 Proposed revision of licence text

Condition	Proposed revision of licence text
Marine Licence 06782	
Part 2.1, Paragraph 2	No more than 180 km of marine cable, including connections between the OSP(s) and landfall connections and no more than two export cables, each export cable measuring no more than 83.3 km.



Table 5.3: Updated Quantities of Deposits

Type of Deposit	Quantity permitted under Licence 06782/19/0	Quantity Proposed
Steel / Iron	Up to approx. 10,000 tonnes	Unchanged
Plastics / Synthetics	Up to approx. 4,400 m ²	Unchanged
Concrete	Up to approx. 16,000 m ³	Unchanged
Sand	Up to approx. 22,000 m ³	Unchanged
Stone / Rock / Gravel	Size range 15 – 200 mm. Up to approx. 220,000 m ³	Unchanged
Concrete bags / Mattresses	Up to approx. 150 mattresses Dimensions 6 x 3 x 0.3 m Volume = approx. 800 m ³	Up to approx. 500 mattresses Dimensions 6 x 3 x 0.3 m Volume = approx. 2,700 m ³
Cable	Length approx. 180,000 m/180 km	Unchanged



Table 5.4: Proposed Alterations to the Location of the Works in Marine Licence 06782

ID	Longitude	Latitude	ID	Longitude	Latitude
1	002°16.76' W	56°28.24' N	62	002°58.19' W	55°58.22' N
2	002°16.87' W	56°21.45' N	63	002°58.25' W	55°58.22' N
3	002°15.42' W	56°22.54' N	64	002°58.28' W	55°58.22' N
4	002°13.18' W	56°25.03' N	65	002°58.31' W	55°58.20' N
5	002°13.05' W	56°25.38' N	66	002°58.44' W	55°58.12' N
6	002°12.03' W	56°25.37' N	67	002°58.46' W	55°58.10' N
7	002°12.02' W	56°25.37' N	68	002°58.49' W	55°58.09' N
8	002°12.22' W	56°24.83' N	69	002°58.50' W	55°58.08' N
9	002°13.91' W	56°22.95' N	70	002°58.52' W	55°58.07' N
10	002°09.69' W	56°25.35' N	71	002°58.54' W	55°58.06' N
11	002°09.35' W	56°25.55' N	72	002°58.54' W	55°58.06' N
12	002°09.08' W	56°25.62' N	73	002°58.54' W	55°58.05' N
13	002°08.87' W	56°25.61' N	74	002°58.55' W	55°58.05' N
14	002°08.67' W	56°25.55' N	75	002°58.59' W	55°58.03' N
15	002°08.54' W	56°25.44' N	76	002°58.62' W	55°58.02' N
16	002°08.53' W	56°25.35' N	77	002°58.63' W	55°58.02' N
17	002°08.53' W	56°25.30' N	78	002°58.63' W	55°58.01' N
18	002°08.66' W	56°25.16' N	79	002°58.64' W	55°58.00' N
19	002°15.88' W	56°20.98' N	80	002°58.65' W	55°57.99' N
20	002°09.88' W	56°21.52' N	81	002°58.65' W	55°57.97' N
21	002°06.53' W	56°23.73' N	82	002°58.65' W	55°57.96' N
22	002°06.38' W	56°23.96' N	83	002°58.64' W	55°57.93' N
23	002°06.35' W	56°25.73' N	84	002°58.64' W	55°57.92' N
24	002°06.35' W	56°25.93' N	85	002°58.65' W	55°57.89' N
25	002°06.31' W	56°26.03' N	86	002°58.66' W	55°57.87' N
26	002°06.20' W	56°26.11' N	87	002°58.67' W	55°57.86' N
27	002°06.06' W	56°26.17' N	88	002°58.68' W	55°57.85' N
28	002°05.84' W	56°26.21' N	89	002°58.68' W	55°57.85' N
29	002°05.63' W	56°26.19' N	90	002°58.72' W	55°57.81' N
30	002°05.46' W	56°26.13' N	91	002°58.72' W	55°57.81' N
31	002°05.36' W	56°26.06' N	92	002°58.73' W	55°57.80' N
32	002°05.35' W	56°26.06' N	93	002°58.77' W	55°57.77' N
33	002°05.28' W	56°25.93' N	94	002°58.80' W	55°57.75' N
34	002°05.33' W	56°23.94' N	95	002°58.81' W	55°57.74' N
35	002°05.64' W	56°23.49' N	96	002°58.86' W	55°57.71' N
36	002°08.49' W	56°21.39' N	97	002°58.90' W	55°57.68' N
37	002°09.49' W	56°20.96' N	98	002°59.32' W	55°58.39' N
38	002°17.08' W	56°20.27' N	99	002°59.70' W	55°58.64' N
39	002°17.74' W	56°19.76' N	100	002°59.73' W	55°58.67' N
40	002°20.22' W	56°17.42' N	101	002°59.70' W	55°59.18' N
41	002°22.06' W	56°13.47' N	102	002°55.88' W	56°01.46' N
42	002°27.63' W	56°09.22' N	103	002°51.14' W	56°04.30' N
43	002°31.45' W	56°07.65' N	104	002°49.55' W	56°04.84' N
44	002°37.34' W	56°06.34' N	105	002°48.16' W	56°05.33' N
45	002°42.62' W	56°05.65' N	106	002°42.77' W	56°06.10' N
46	002°47.92' W	56°05.05' N	107	002°37.58' W	56°06.75' N
47	002°50.98' W	56°04.15' N	108	002°31.96' W	56°08.06' N
48	002°51.38' W	56°03.92' N	109	002°28.31' W	56°09.59' N



ID	Longitude	Latitude	ID	Longitude	Latitude
49	002°55.62' W	56°01.38' N	110	002°23.03' W	56°13.77' N
50	002°55.94' W	56°01.19' N	111	002°21.14' W	56°17.62' N
51	002°59.44' W	55°59.10' N	112	002°20.90' W	56°17.88' N
52	002°59.45' W	55°58.72' N	113	002°18.60' W	56°20.10' N
53	002°59.10' W	55°58.49' N	114	002°17.90' W	56°20.65' N
54	002°57.93' W	55°58.25' N	115	002°17.71' W	56°28.70' N
55	002°58.03' W	55°58.22' N	116	002°17.64' W	56°28.83' N
56	002°58.07' W	55°58.20' N	117	002°17.47' W	56°28.93' N
57	002°58.07' W	55°58.20' N	118	002°17.23' W	56°28.96' N
58	002°58.07' W	55°58.20' N	119	002°17.22' W	56°28.96' N
59	002°58.12' W	55°58.19' N	120	002°17.23' W	56°28.70' N
60	002°58.17' W	55°58.21' N	121	002°16.76' W	56°28.24' N
61	002°58.17' W	55°58.21' N			
Proposed Extended Cable Corridor					
1	002°12.03' W	56°25.37' N	6	002°17.23' W	56°28.70' N
2	002°13.05' W	56°25.38' N	7	002°17.22' W	56°28.96' N
3	002°13.81' W	56°25.38' N	8	002°14.53' W	56°28.92' N
4	002°14.51' W	56°26.06' N	9	002°14.29' W	56°28.88' N
5	002°16.76' W	56°28.24' N	10	002°14.12' W	56°28.78' N