



Inch Cape

OFFSHORE LIMITED

**Inch Cape Offshore Transmission Works:
Marine Licence (06782/19/0)
Variation Screening Request
& Supporting Information**

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Acronyms & Abbreviations

| Acronym | Term |
|---------|--|
| AA | Appropriate Assessment |
| DSLp | Development Specification and Layout Plan |
| EIA | Environmental Impact Assessment |
| EIAR | Environmental Impact Assessment Report |
| ES | Environmental Statement |
| ICOL | Inch Cape Offshore Limited |
| LAT | Lowest Astronomical Tide |
| MSL | Mean Sea Level |
| MW | Megawatt |
| OfTI | Offshore Transmission Infrastructure |
| OfTW | Offshore Transmission Works |
| OSP | Offshore Substation Platform |
| SAR | Search And Rescue |
| SLVIA | Seascape, Landscape and Visual Impact Assessment |
| WTG | Wind Turbine Generator |

Glossary

| Defined Term | Meaning |
|---|--|
| The 2010 Act | Marine (Scotland) Act 2010 |
| The 2013 Application | The Environmental Statement, HRA Report and supporting documents submitted by the Company on 1 st July 2013 to construct and operate an offshore generating station and transmission works. |
| The 2018 Application | The EIA Report, HRA Report and supporting documents submitted by the Company on 15 August 2018 to construct and operate an offshore generating station and transmission works. |
| Development Area | The area for the Wind Farm, within which all WTGs, inter-array cables, interconnector cables, 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 Transmission Infrastructure (OfTI) | Components of the Development which are permitted by the OfTI Marine Licence (06782/19/0). |
| Inch Cape Offshore 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 out with the Development Area 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. |
| The Wind Farm | The Inch Cape Offshore Wind Farm |

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) are required in order to successfully install the Offshore Export Cables following further detailed 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.

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

Following review of the 2013 Environmental Statement (ES) and 2018 Environmental Impact Assessment Report (EIAR), and further consideration of environmental effects arising from the proposed changes, no further significant impacts were identified to arise from the Proposed Variation, and it is considered that no EIA is required. Furthermore, no new or materially different impacts have been identified 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.

A separate variation application for the Inch Cape Offshore Wind Farm Section 36 Consent and Marine Licence 06781/19/0, 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 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).

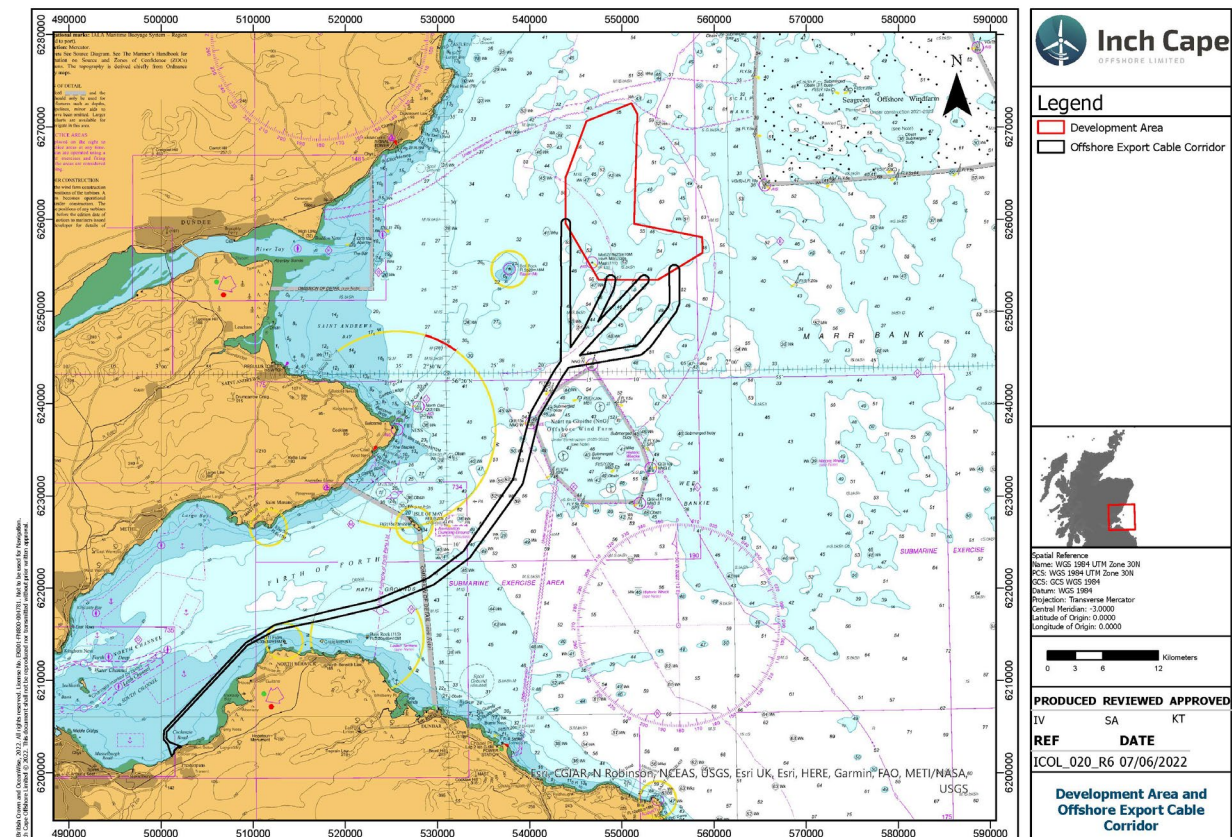


Figure 1.1: Inch Cape Offshore Development Area and Offshore Export Cable Corridor

- 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.

¹ Since the consent for the revised design was received, ICOL have 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.



- 4 The revised Marine Licence (06782/19/0) (dated 17th 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 15-22km 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.

1.2 Intention to Vary Existing Consents

- 5 ICOL intends to request a variation to Marine Licence Number: 06782/19/0 in accordance with section 30(7) of the Marine (Scotland) Act 2010 (2010 Act).
- 6 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 potential 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.
- 7 ICOL would like to request a Screening Opinion for the Proposed Variation from the Scottish Ministers via MS-LOT.
- 8 ICOL considers that the Proposed Variation should be screened out for the purposes of EIA in terms of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Electricity Works EIA Regulations) and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Marine Works EIA Regulations) (together, the EIA Regulations).
- 9 Under the EIA Regulations, development will be considered EIA development if it either:
1. constitutes Schedule 1 Development; or
 2. constitutes Schedule 2 Development and is likely to have significant effects on the environment having regard to the factors set out in Schedule 3².
- 10 Schedule 2 paragraph 2 of the Electricity Works EIA Regulations states that the following will constitute EIA development:
- "Any change to or extension (including a change in the manner or period of operation) of development of a description listed in schedule 1 or in paragraph 1 of this schedule [Schedule 2] where that development is already authorised, executed, or in the process of being executed, and the change or extension may have significant adverse effects on the environment."*
- 11 The Proposed Variation is a change to an already authorised OfTW and, as such, would constitute Schedule 2 development (and thus require an EIA) if the Proposed Variation were to have significant

² Namely, having regard to the characteristics of the works (e.g., the size and design of the works, cumulation with other existing works and/or approved works, the use of natural resources, in particular land, soil, water and biodiversity, etc.), the location of the works and characteristics of the potential impact (e.g. the magnitude and spatial extent of the impact, the nature of the impact, etc.).

adverse effects on the environment. Development which comprises a change requires EIA only if the change or extension is likely to have significant environmental effects.

- 12 As demonstrated in this Screening Report, the Proposed Variation will not have significant adverse effects on the environment. The Proposed Variation does not constitute EIA development and therefore it is appropriate to screen the Proposed Variation out of the requirement for EIA³.

1.3 Scope of this Document

- 13 This document has been produced to provide the supporting information to inform the request for a Screening Opinion for the Proposed Variation, and contains the following:
- Details of the Proposed Variation (Section 2);
 - Screening for potential for change of effect (Section 3);
 - Further consideration of the significance of any change in effect (Section 3);
 - Summary of considerations (Section 4).
- 14 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.

³ The position under the Marine Works EIA Regulations is broadly similar to that under the Electricity Works EIA Regulations.



2 Project Description and Proposed Variation

2.1 Existing Project Characteristics

2.1.1 Description of Development

15 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.

16 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

17 The Proposed Variation will capture the following elements:

- 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

18 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 OSP location.

19 The Proposed Variation is that the wording of the Marine Licence be 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.~~

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

21 Updates to the volumes of deposits following detailed engineering are proposed (see Table 2.2). Following detailed design, it is anticipated that an increase in the quantity of mattresses will be required for cable crossings (see Section 7.9.3, para 102 of the 2018 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 WTGs or OSP topsides).

2. Trenching is not included in this table but detailed within the EIA Report.



3. Dredging and drilling works are not included in this table but are detailed within the EIA Report and Q17 of this application.

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.

22 The potential for this change to lead to significant environmental effects is considered in Section 3.

2.2.2 Revision of the Offshore Export Cable Corridor Coordinates

23 The Proposed Variation is required to revise the current Offshore Export Cable Corridor coordinates to 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° 14.12' W | 56° 28.78' N | 43 | 002° 59.45' W | 55° 58.72' N |
| 2 | 002° 12.02' W | 56° 25.37' N | 44 | 002° 59.10' W | 55° 58.49' N |
| 3 | 002° 12.22' W | 56° 24.83' N | 45 | 002° 57.93' W | 55° 58.25' N |
| 4 | 002° 13.91' W | 56° 22.95' N | 46 | 002° 57.91' W | 55° 58.21' N |
| 5 | 002° 09.35' W | 56° 25.55' N | 47 | 002° 57.98' W | 55° 58.18' N |
| 6 | 002° 09.08' W | 56° 25.62' N | 48 | 002° 58.12' W | 55° 58.17' N |
| 7 | 002° 08.87' W | 56° 25.61' N | 49 | 002° 58.27' W | 55° 58.21' N |
| 8 | 002° 08.67' W | 56° 25.55' N | 50 | 002° 58.63' W | 55° 57.98' N |
| 9 | 002° 08.54' W | 56° 25.44' N | 51 | 002° 58.66' W | 55° 57.85' N |
| 10 | 002° 08.53' W | 56° 25.30' N | 52 | 002° 58.90' W | 55° 57.68' N |
| 11 | 002° 08.66' W | 56° 25.16' N | 53 | 002° 59.32' W | 55° 58.39' N |
| 12 | 002° 15.88' W | 56° 20.98' N | 54 | 002° 59.70' W | 55° 58.64' N |
| 13 | 002° 09.88' W | 56° 21.52' N | 55 | 002° 59.73' W | 55° 58.67' N |
| 14 | 002° 06.53' W | 56° 23.73' N | 56 | 002° 59.70' W | 55° 59.18' N |
| 15 | 002° 06.38' W | 56° 23.96' N | 57 | 002° 55.88' W | 56° 01.46' N |
| 16 | 002° 06.35' W | 56° 25.93' N | 58 | 002° 51.14' W | 56° 04.30' N |
| 17 | 002° 06.31' W | 56° 26.03' N | 59 | 002° 49.55' W | 56° 04.84' N |
| 18 | 002° 06.20' W | 56° 26.11' N | 60 | 002° 48.16' W | 56° 05.33' N |
| 19 | 002° 06.06' W | 56° 26.17' N | 61 | 002° 42.77' W | 56° 06.10' N |
| 20 | 002° 05.84' W | 56° 26.21' N | 62 | 002° 37.58' W | 56° 06.75' N |
| 21 | 002° 05.63' W | 56° 26.19' N | 63 | 002° 31.96' W | 56° 08.06' N |
| 22 | 002° 05.46' W | 56° 26.13' N | 64 | 002° 28.31' W | 56° 09.59' N |
| 23 | 002° 05.35' W | 56° 26.06' N | 65 | 002° 23.03' W | 56° 13.77' N |
| 24 | 002° 05.28' W | 56° 25.93' N | 66 | 002° 21.14' W | 56° 17.62' N |
| 25 | 002° 05.33' W | 56° 23.94' N | 67 | 002° 20.90' W | 56° 17.88' N |
| 26 | 002° 05.64' W | 56° 23.49' N | 68 | 002° 18.60' W | 56° 20.10' N |
| 27 | 002° 08.49' W | 56° 21.39' N | 69 | 002° 17.90' W | 56° 20.65' N |
| 28 | 002° 09.49' W | 56° 20.96' N | 70 | 002° 17.71' W | 56° 28.70' N |
| 29 | 002° 17.08' W | 56° 20.27' N | 71 | 002° 17.64' W | 56° 28.83' N |

| ID | Longitude | Latitude | ID | Longitude | Latitude |
|----|---------------|--------------|----|---------------|--------------|
| 30 | 002° 17.74' W | 56° 19.76' N | 72 | 002° 17.47' W | 56° 28.93' N |
| 31 | 002° 20.22' W | 56° 17.42' N | 73 | 002° 17.23' W | 56° 28.96' N |
| 32 | 002° 22.06' W | 56° 13.47' N | 74 | 002° 14.53' W | 56° 28.92' N |
| 33 | 002° 27.63' W | 56° 09.22' N | 75 | 002° 14.29' W | 56° 28.88' N |
| 34 | 002° 31.45' W | 56° 07.65' N | 76 | 002° 14.12' W | 56° 28.78' N |
| 35 | 002° 37.34' W | 56° 06.34' N | 77 | 002° 16.76' W | 56° 28.24' N |
| 36 | 002° 42.62' W | 56° 05.65' N | 78 | 002° 16.87' W | 56° 21.45' N |
| 37 | 002° 47.92' W | 56° 05.05' N | 79 | 002° 15.42' W | 56° 22.54' N |
| 38 | 002° 50.98' W | 56° 04.15' N | 80 | 002° 13.18' W | 56° 25.03' N |
| 39 | 002° 51.38' W | 56° 03.92' N | 81 | 002° 13.05' W | 56° 25.38' N |
| 40 | 002° 55.62' W | 56° 01.38' N | 82 | 002° 13.81' W | 56° 25.38' N |
| 41 | 002° 55.94' W | 56° 01.19' N | 83 | 002° 16.76' W | 56° 28.24' N |
| 42 | 002° 59.44' W | 55° 59.10' N | | | |

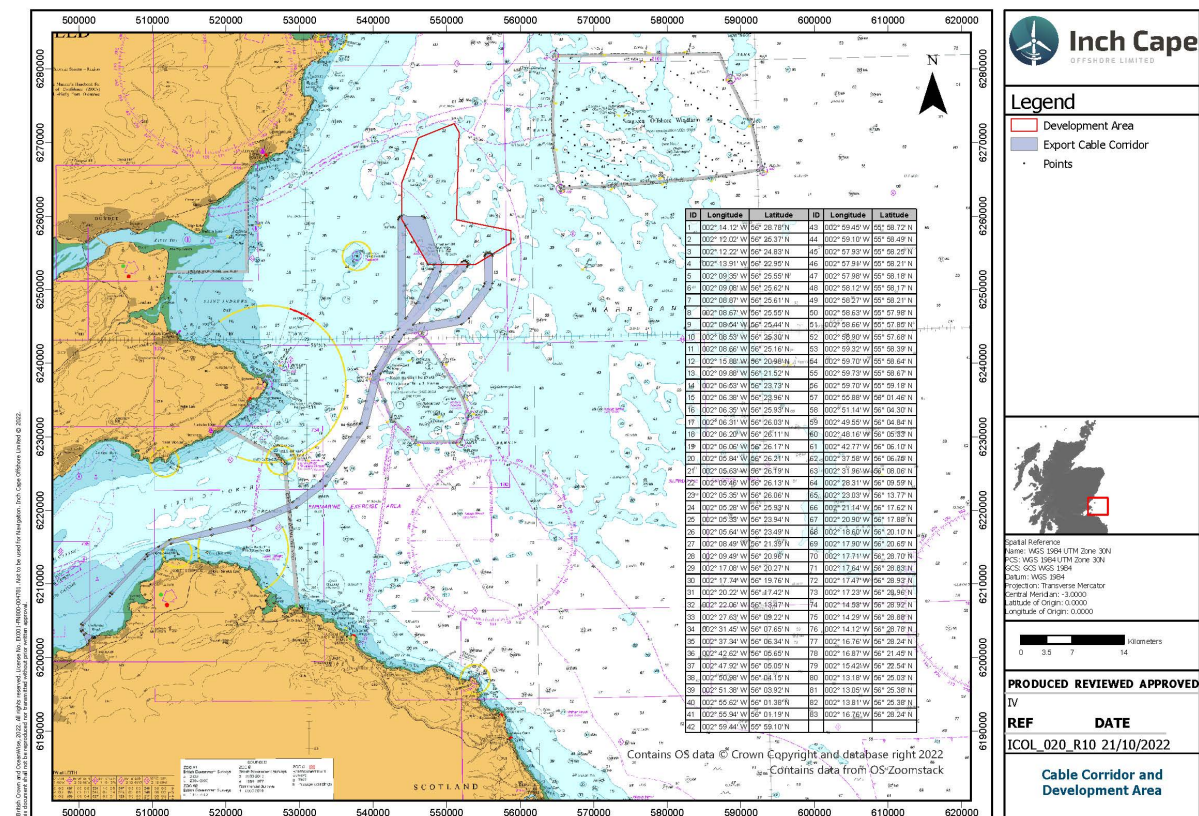


Figure 2.1: Proposed Revised Offshore Export Cable Corridor

24 The maximum total length of Offshore Export Cable, 180 km, is unchanged by the revision of the Offshore Export Cable Corridor coordinates. The Offshore Export Cable Corridor will extend into the Development Area which, as per the Project Description extract⁴ 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-

⁴ ICOL 2018, Inch Cape Wind Farm EIAR, Chapter 7.



array cables, OSPs and initial part of the Offshore Export Cable (part of the OfTW component) and any other associated works.”

- 25 All other parameters remain unchanged by the revision to the Offshore Export Cable Corridor coordinates and therefore no further information and consideration of environmental effects is given to this element of the Proposed Variation within this report.

3 Review of Environmental Effects

26 Following a review of the existing consents, the potential environmental impacts considered in the 2013 ES and 2018 EIAR for the OfTW that are relevant to the Proposed Variation are reviewed and summarised in the sections below. This review and all subsequent assessments have been undertaken with particular regard to the environmental sensitivities of the geographical area that may be affected through a review of relevant designated sites (Table 3.1).

Table 3.1: Relevant Designated Sites

| Designated Site Name | Designation |
|---|--------------------|
| Firth of Forth Banks Complex | MPA |
| River South Esk | SAC |
| Firth of Tay and Eden Estuary | SAC |
| Barry Links | SAC |
| Isle of May SAC | SAC |
| River Tay | SAC |
| River Dee | SAC |
| Berwickshire and North Northumberland Coast | SAC |
| River Tweed | SAC |
| River Teith | SAC |
| Moray Firth SAC | SAC |
| Outer Firth of Forth and St Andrews Bay Complex SPA | SPA |
| Forth Islands | SPA |
| Fowlsheugh SPA | SPA |
| St Abb's Head to Fast Castle SPA | SPA |
| Imperial Dock Leith | SPA |
| Buchan Ness to Collieston Coast SPA | SPA |
| Slamannan Plateau | SPA |
| Upper Solway Flats and Marshes | SPA |
| Firth of Forth | SPA/Ramsar/SSSI |
| Montrose Basin | SPA/SSSI |
| Whiting Ness - Ethie - Haven Coast | SSSI |
| Rickle Craig - Scurdie Ness | SSSI |
| Elliott Links | SSSI |
| St Cyrus & Tentsmuir Coast | SSSI |
| East Haven | SSSI |
| Tayport - Tentsmuir Coast | SSSI |



| Designated Site Name | Designation |
|-----------------------------------|-------------|
| Barry Links | SSSI |
| Fife Ness Coast | SSSI |
| St Andrews - Craig Hartle | SSSI |
| Barnsmuir Coast | SSSI |
| Isle of May | SSSI |
| Eden Estuary | SSSI |
| Inner Tay Estuary | SSSI |
| Bass Rock | SSSI |
| Barns Ness Coast | SSSI |
| Pease Bay Coast | SSSI |
| St Abb's Head to Fast Castle | SSSI |
| Siccar Point | SSSI |
| Sands of Forvie and Ythan Estuary | SSSI |

- 27 The designated sites described includes all those considered in the Habitats Regulations Appraisals (HRA) undertaken for the Project for the existing consent and has been updated to include any additional (i.e., recently designated) sites considered relevant to this screening request. It should be noted that no new Special Protection Areas (SPAs) or Special Areas of Conservation (SACs) have been identified that could be affected by the work over those considered in the existing Habitats Regulation Appraisal (HRA)⁵.
- 28 Topics were considered not to require additional information or review where impacts of the Proposed Variation will be less than or equal to those assessed or described in the 2018 EIAR (or 2013 EIA where topics were scoped out of the 2018 EIAR). Additional information is provided in Section 4, where required.

⁵ Noting some sites may have been at pSPA or cSAC status at the time of the initial application, however these sites were still considered fully at the time.



4 Further Technical Considerations

4.1 Temporary and permanent deposit quantities (Cables)

- 29 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.
- 30 Within the 2013 ES, the design envelope included for 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.
- 31 The proposal to use the full allowable deposit of Offshore Export Cables is to allow for micro-siting within the Offshore Export Cable Corridor. 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 no EIA will be required for this element of the Proposed Variation.
- 32 The assessment of impacts in relation the use of rock protection for 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 over that assessed in the 2013 ES and subsequently consented in 2014. The maximum footprint of effect considered in 2017 Scoping was 0.4 km².
- 33 Within the 2013 ES, the design envelope included for up to six offshore export cables of 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 equate 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.
- 34 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 2017 Scoping of 0.4 km² and therefore will not constitute a significant impact to any receptor group, and no EIA will be required for this element of the Proposed Variation.

4.2 Cumulative considerations

- 35 Following 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.

4.3 Habitats Regulation Assessment (HRA)

- 36 As with the 2018 application, it is recognised that elements of the work may be undertaken within the Outer Firth of Forth and St Andrews Bay Complex SPA⁶. Construction impacts on the SPA

⁶ The Outer Firth of Forth and St Andrews Bay Complex SPA was a proposed SPA (pSPA) at the time of the 2018 application but considered in line with all other designated sites.

arising from the installation and operation of the Offshore Export Cable and associated 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 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.

37 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.

38 Under the Proposed Variation the conclusions of the AA remain valid. 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.

4.4 Summary and Screening Outcome

39 Table 4.1 provides the summary of findings in relation to the Screening Request.

Table 4.1: Summary of findings in relation to Proposed Variation elements

| Variation | EIA required | Summary Justification |
|--|--------------|--|
| Temporary and permanent deposit quantities | No | <p>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 no significant effects can be concluded and there is no requirement for an EIA 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 the 2017 Scoping of 0.4 km². As such no significant effects can be concluded and there is no requirement for an EIA for this element of the Proposed Variation.</p> |
| Revision of the 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 was required within this report. As such it can be concluded and there is no requirement for an EIA for this element of the Proposed Variation.</p> |



- 40 Following review of the 2013 ES and 2018 EIAR scoping, no new or materially different impacts have been identified, therefore it is appropriate to screen the Proposed Variation out of the requirement for EIA.

5 Conclusion and Recommendations

- 41 The Proposed Variation does not give rise to any new or materially different impacts and therefore it is appropriate to screen the Proposed Variation out of the requirement for EIA.
- 42 The proposed amendments of quantities are summarised in Table 2.2. The revision of coordinates is summarised in Table 2.3. Consideration of the proposed changes to the quantities of deposits and revision of the GPS coordinates are summarised in Table 4.1.