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# Seagreen 1A Alternative Cable Landfall Method Marine Licence Application Screening Letter and Information

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## **Seagreen 1A Alternative Cable Landfall Installation Method Marine Licence Application: Request for EIA Screening Opinion and Request for Pre-Application Consultation Statement.**

Seagreen 1A Limited (hereafter referred to as SG1A) are proposing to make a marine licence application to authorise an alternative landfall cable installation method for the consented export cable from the Seagreen offshore wind farm to landfall at Cockenzie, located in East Lothian (hereafter referred to as the Proposed Works). SG1A propose that a similar licencing approach is adopted to that of the Carnoustie Alternative Installation Methodology Marine Licence (ref: MS-00009445<sup>1</sup>), where a new marine licence was awarded that included conditions that referenced the original Seagreen Offshore Transmission Asset (OTA) Marine Licence.

SG1A is of the understanding the Proposed Works constitute a change to an authorised project and therefore fall under Entry 13 of the Table in paragraph 2 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (hereafter referred to as the 2017 Regulations). With this letter and attached information, SG1A is requesting an EIA screening opinion under Regulation 10(1) of the 2017 Regulations. The information provided with this letter satisfies the criteria for requesting a screening opinion under Regulation 10(2), 10(3) and 10(4) of the 2017 Regulations.

The alternative landfall cable installation method will involve ploughing or mechanical trenching (also termed 'open cut' trenching), between the original proposed landward entrance point of the horizontal directional drill (approximately 10 m above charted mean high-water springs), across the beach and intertidal zone, down to a depth of 5 m (LAT) (approximately 700 m below charted mean high water springs). SG1A propose that any significant potential impacts associated with the Proposed Works are identified and mitigated within a concise Environmental Appraisal which will accompany the Marine Licence application. This is consistent with the position taken by Marine Scotland for a similar alteration to the Seagreen (OTA) Marine Licence at Carnoustie, which was deemed by Marine Scotland to not be an EIA project and therefore not requiring a full EIA.

In addition, and also consistent with Marine Licence MS-00009445, SG1A considers that formal pre-application consultation (PAC) under the Marine Licensing (PAC) (Scotland) Regulations 2013 (the PAC Regulations) is not required for the Proposed Works, as the criteria for PAC under Regulation 4 of the PAC Regulations are not met.

On review of this letter and the accompanying information provided below, SG1A request that Marine Scotland confirm that the Proposed Works do not constitute an EIA project under the 2017 Regulations and that PAC is not required.

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<sup>1</sup> Originally issued as 07050/19/0 and subsequently varied as 07050/19/1, 07050/20/0 and MS-00009445

## 1. Introduction

Seagreen Wind Energy Ltd (SWEL) is a joint venture between SSE Renewables (49%) and Total (51%). SWEL was awarded exclusive development rights in the Firth of Forth Round 3 Offshore Wind Zone (the 'Firth of Forth Zone') by The Crown Estate in 2010. The Firth of Forth Zone lies beyond the 12 nautical mile Scottish territorial waters limit. In 2014, SWEL were awarded the following consents:

1. Seagreen Alpha Marine Licence<sup>2</sup> and Seagreen Alpha S36 Consent<sup>3</sup> for Seagreen Alpha Offshore Wind Farm (OWF);
2. Seagreen Bravo Marine Licence<sup>4</sup> and Seagreen Bravo S36 Consent<sup>5</sup> for Seagreen Bravo OWF; and
3. Seagreen Offshore Transmission Asset (OTA) Marine Licence to Carnoustie<sup>6</sup>.

Together these consents comprise 'the Seagreen Project'.

To maximise energy generation and facilitate full export capacity from the Seagreen Project, Seagreen 1A Limited obtained consent for an additional export cable corridor (approximately 108 km) from the consented Seagreen Alpha and Seagreen Bravo OWFs to an identified landfall location at Cockenzie<sup>7</sup>. This includes one high voltage export cable to mean high water springs (MHWS), cable landfall and connection to onshore infrastructure and together comprise the 'Seagreen 1A Project' or 'SG1A Project'. The SG1A Project is planned to support connection of additional export capacity to accommodate the remaining 36 consented but not constructed Wind Turbine Generators (WTGs) under the Seagreen Project consents. Figure 1.1 presents the location of the Seagreen Alpha and Seagreen Bravo OWFs and SG1A Project.

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<sup>2</sup> [Seagreen Alpha Marine Licence](#)

<sup>3</sup> [Seagreen Alpha S.36 Consent](#)

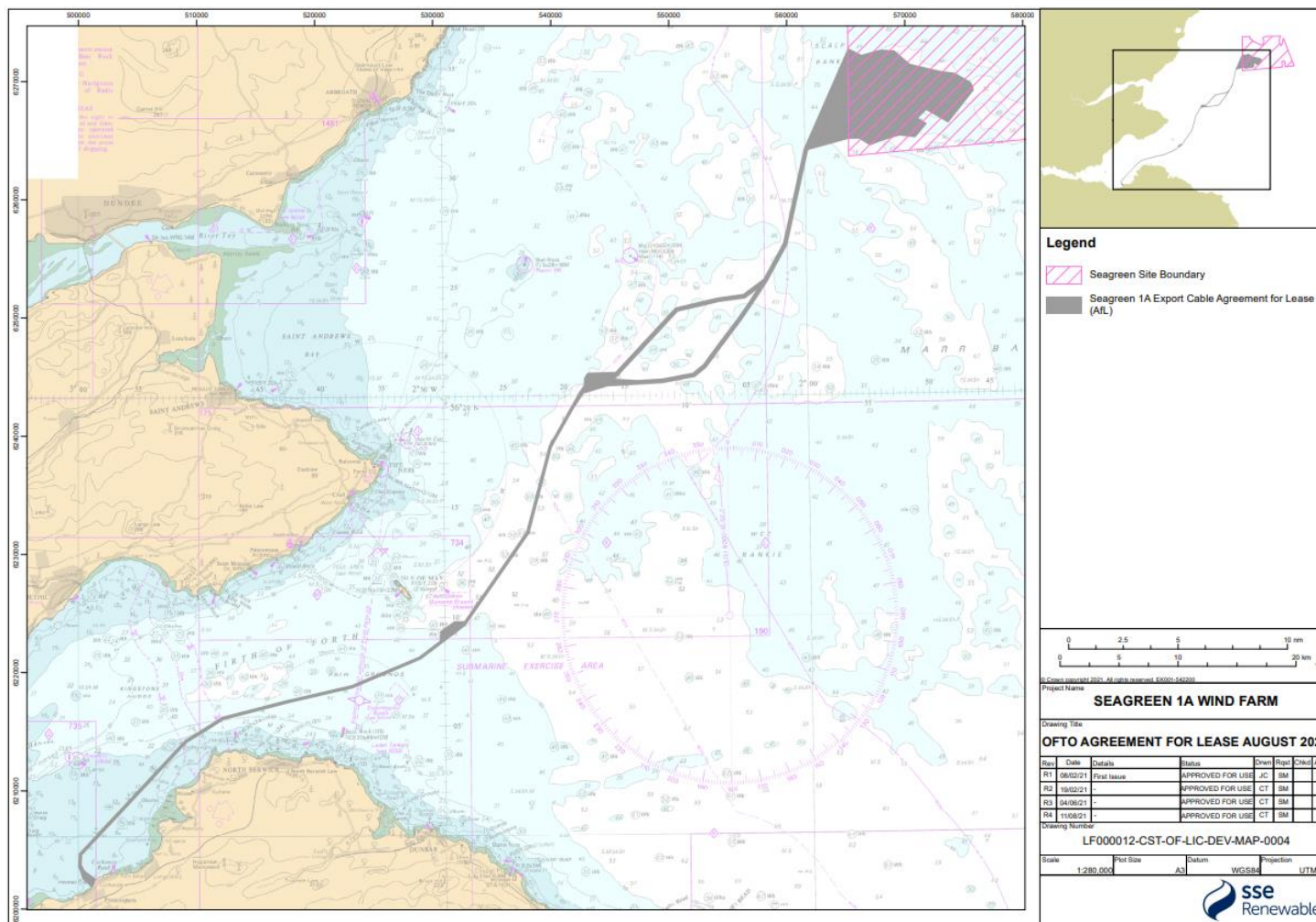
<sup>4</sup> [Seagreen Bravo Marine Licence](#)

<sup>5</sup> [Seagreen Bravo S.36 Consent](#)

<sup>6</sup> [Seagreen Offshore Transmission Asset to Carnoustie Marine Licence](#)

<sup>7</sup> [Seagreen 1A Offshore Transmission Asset to Cockenzie Marine Licence](#)

Figure 1.1 - Seagreen Alpha and Bravo OWFs (labelled 'Seagreen Site Boundary') and SG1A Project Licensed Area



## 1.1 Background and Approach

Awarded in December 2021, the existing SG1A Project Marine Licence (Licence Number: MS-00009291) permits the installation of one export cable between the Seagreen Project array area and the landfall at Cockenzie. The existing SG1A Project Marine Licence was considered an EIA project under the Marine Works (EIA) (Scotland) Regulations 2017, with an Environmental Impact Assessment Report (EIAR) submitted in support of the Marine Licence application<sup>8</sup>. The SG1A Project Marine Licence states the following in relation to the landfall:

*‘Export cable installation at intertidal area will be by Horizontal Directional Drilling (“HDD”) under the coastal defence from above MHWS and continued by ploughing or mechanical trenching across the intertidal area to meet the offshore works.’*

SG1A is applying for a marine licence for an alternative landfall cable installation methodology, in addition to the already consented horizontal directional drilling (HDD) installation methodology, although only one installation methodology will be implemented. This alternative method is for ploughing or mechanical trenching (also termed ‘open cut’ trenching), between the original proposed landward entrance point of the HDD (approximately 10 m above charted MHWS), across the beach and intertidal zone, down to a depth of 5 m (LAT) (approximately 700 m below charted MHWS) (the ‘Proposed Works’). Since the SG1A Project EIAR was submitted, further geotechnical technical assessment of the ground conditions at and near landfall has shown that HDD installation may pose significant technical challenges. The alternative method proposed is open cut trenching which is a better technical solution as it alleviates some of the constraints and challenges associated with the site conditions (e.g. morphology, soil types and soil thermal resistivity) at the shore approach and landfall area.

Under the Marine (Scotland) Act 2010, a Marine Licence is required if a person or organisation intends to carry out marine construction works within the Scottish marine area seaward of MHWS and therefore a Marine Licence is required for the alternative landfall cable installation methodology up to the point of MHWS. Separate approval from East Lothian Council is also required and this being sought under a new onshore planning application under the Town and Country Planning (Scotland) Act 1997 (as amended).

SG1A propose that a similar licencing approach is adopted to that of the Carnoustie Alternative Installation Methodology Marine Licence (ref: MS-00009455), where a new marine licence was awarded that included conditions that referenced the original Marine Licence. This would facilitate submission of consent plans under the original Marine Licence that provide necessary details to discharge consent conditions for the alternative installation methodology.

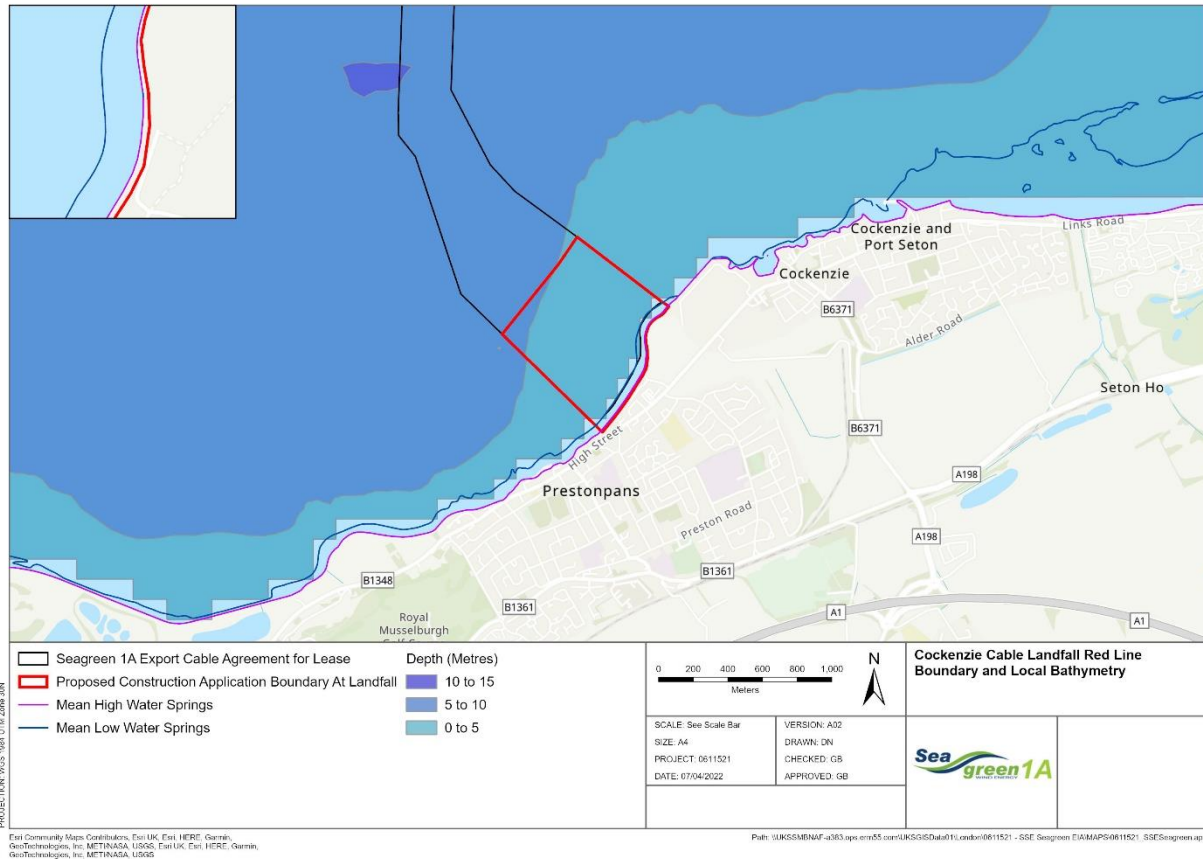
The Marine Licence application boundary for the alternative landfall cable installation methodology is shown in Figure 1.2, and includes the intertidal and subtidal zones.

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<sup>8</sup> [Seagreen 1A: Offshore Export Cable Corridor Environmental Impact Assessment Report.](#)



Figure 1.2 - Cable Landfall Red Line Boundary



The purpose of this document is to:

- Provide information required under Regulation 10(2), 10(3) and 10(4) of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the 2017 Regulations) to allow Marine Scotland Licencing Operations Team (MS-LOT) to determine if the Proposed Works are screened out of being an EIA project;
- Confirm that formal pre-application consultation (PAC) under the Marine Licensing (PAC) (Scotland) Regulations 2013 (the PAC Regulations) is not required for the Proposed Works; and
- Scope the proposed Environmental Appraisal to be submitted to MS-LOT alongside the Marine Licence application.

## 2. Project Description

The landfall location near Cockenzie power station is limited in area by the built-up areas of Prestonpans to the west and Cockenzie to the east.

### 2.1 Alternative Installation Method

Offshore export cable installation activities at the landfall will consist of pre-installation of a single cable duct/pipe installed by either jet burial, open cut trenching or HDD (consented under current licence) from the onshore transition joint bay to extend beyond the intertidal area. The burial depth of this pipe will be sufficient to provide mechanical protection from third party risks and include for any additional risk from long term shallow water sediment erosion.

Open cut trenching in stronger seabed materials may require a barge mounted backhoe for direct excavation followed by backfill. For open cut excavation in the intertidal zone, temporary sheet piling or a cofferdam may be required to provide safe trench side support during excavation. The dimensions of the sheet piling / cofferdam may be up to 50m long by 12m wide and would extend through the rip rap sea defence by approximately 15m out onto the beach. Once the pipe is installed the cofferdam will be subsequently removed and the rip rap sea defence temporarily reinstated until the subsea cable is ready to be installed.

Seaward of the pipe end, the cable will be buried where practicable by direct trenching into the seabed material. Cable burial may be by water jetting or ploughing remotely operated vehicle (ROV). Areas of very hard seabed may also require the provision of additional mechanical cable protection such as rock dumping, cast iron shells or concrete flexible mattresses.

Initially the cable pipe end will be left shallow buried offshore to allow pull in of the cable from the cable lay vessel (CLV). The cable end will be floated or lowered to the pipe end from the CLV where it will be engaged in the pipe and pulled to shore using a winch and wire. The offshore cable will then be lowered to the seabed and along with the pipe end buried using an ROV into the seabed sediment by water jetting or ploughing.

### 2.2 Key Parameters

Table 2.1 presents the key parameters of the Proposed Works and Figure 2.1 to Figure 2.8 provide examples of the type of equipment, vessels and vehicles that would be used to complete the open cut trenching cable installation.



Table 2.1 - Proposed Works Parameters

Parameter	Details
Need for open cut trenching installation method	Following further detailed site investigations and design studies, it has been identified that HDD may pose significant technical challenges due to ground conditions. The alternative method proposed is open cut trenching which is a better technical solution as it alleviates some of the constraints and challenges associated with the site conditions (e.g. morphology, soil types, soil thermal resistivity) at the shore approach and landfall area.
Number of interface joint pits - onshore	One
Number of trenches - onshore <i>From MHWS to interface joint pits</i>	One
Number of trenches - intertidal and subtidal <i>Below MHWS</i>	One
Dimensions of trench - onshore (W x D x L) <i>From MHWS to interface joint pit</i>	5m x 3m x 125m
Dimensions of trench - intertidal and subtidal (W x D x L) <i>Below MHWS</i>	12m x 3m x 700m
Length of sheet piling / cofferdam (if required)	50m long x 12m wide x 7.0m high (from beach to top of sheet piles)
Plan area of interface joint pit - onshore	250 m <sup>2</sup>
Plan area of trench (onshore)	625 m <sup>2</sup>
Plan area of trench (intertidal and subtidal)	8,400 m <sup>2</sup>
Volume - interface joint pits - onshore	625m <sup>3</sup>
Volume - trenches - onshore	1,875 m <sup>3</sup>
Volume - trenches - intertidal and subtidal	25,200 m <sup>3</sup>
Working area - onshore	125m x 30m (3,750 m <sup>2</sup> )
Working areas - below MHWS	700m x 80m (56,000m <sup>2</sup> )

Parameter	Details
Total area temporarily disturbed below MHWS - intertidal and subtidal <i>Trench area + working area</i>	56,000m <sup>2</sup>
Storage/laydown/welfare areas and site compounds - onshore	50m x 50m
Access to works below MHWS	Jack up barge accessed via a crew transfer vessel (CTV) from a local port
Vessels and plant	Assume the following plant is required to construct the offshore open cut trench. Jack up 30m x 30m (e.g. Haven Seariser) / Multicat 26m (e.g. C Fenna) / 80t tracked excavator / 130t crawler crane
Indicative duration of works between MHWS and 700m offshore <i>Includes excavation, installation of cable ducts and or burial of cables and reinstatement</i>	Open cut trenching in intertidal area and jetting in subtidal out to 700m offshore (without the use of a cofferdam) – 3 months  Open cut trenching with cofferdam (50m seaward from rip rap sea defences) followed by jetting of the cable to 700m below MHWS – 5 months
Cable parameters (Typical)	Landfall Cable - (Shallow Water) 2000mm <sup>2</sup> Copper Core Cable - Outer Diameter 280mm Weight 135kg/m.  Offshore Cable - 1800mm <sup>2</sup> Aluminium Core Cable – Outer Diameter 270mm Weight 127kg/m

Figure 2.1 - Cable Lay Vessel



*Figure 2.2 - Offshore Backhoe Excavator*



*Figure 2.3 - Shallow Water Cable Burial ROV*



Figure 2.4 - Deep Water Cable Burial ROV



Figure 2.5 - Open Cut Trenching





*Figure 2.6 - Cable Float In*



*Figure 2.7 - Offshore Cable*



Figure 2.8 - Cable Pull-In Winch



### 2.3 Licensable Marine Activities

The following activities associated with the alternative cable landfall installation are considered to be licensable under the Marine (Scotland) Act 2010 and will be considered within the Environmental Appraisal that supports the Marine Licence application:

- Temporary removal and storage of material in the intertidal and subtidal zones;
- Creation of working areas in the intertidal zone;
- Open cut trenching and pipe installation in the intertidal and subtidal zones;
- Backfilling of the trench(es) in the intertidal and subtidal zones; and
- Cable pull-in.

## 3. Approach to Consenting

The following sections set out the approach for the marine consenting process, with reference to the 2017 Regulations and the PAC Regulations.

### 3.1 Consideration of the Need for EIA

Seagreen has determined that an EIA under the 2017 EIA Regulations is not required to support the Marine Licence application for the reasons described in this section.

The 2017 Regulations define an “EIA project” as works which are either:

- (a) Schedule 1 works; or

- (b) Schedule 2 works likely to have significant effects on the environment by virtue of factors such as their nature, size or location.

Regulation 9 of the 2017 Regulations specify that in making a determination as to whether or not a Schedule 2 project is an EIA project, the relevant selection criteria set out in Schedule 3 must be considered together with the results of any relevant assessment. These criteria cover the characteristics of the works, the location of the works and the characteristics of the potential impact. Each of these are addressed in turn within the following sections.

### 3.1.1 Characteristics of Proposed Works

Schedule 3 of the 2017 Regulations set out the selection criteria for screening of Schedule 2 works.

The 2017 Regulations specify that the characteristics of the works must be considered having regard, in particular, to the following selection criteria:

- a) the size and design of the works;
- b) cumulation with other existing works and/or approved works;
- c) the use of natural resources, in particular land, soil, water and biodiversity;
- d) the production of waste;
- e) pollution and nuisances;
- f) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and
- g) the risks to human health (for example due to water contamination or air pollution).

SG1A have considered each of characteristics of the works under each of the headings below.

#### (a) Size and design of the Proposed Works

In relation to the size and design of the works, the Proposed Works are relatively small in the context of the overall scale of the consented SG1A Project and when compared to the total area of Prestonpans Beach. The Proposed Works will take place within the existing consented SG1A Project corridor and involve the installation of a single trench approximately 825 m (700 m long x 12 m wide x 3 m deep through the intertidal, and 125 m long x 5 m wide x 3 m deep onshore) of cable at the landfall.

#### (b) Cumulation with other existing works and/or approved works

In terms of cumulation with other existing works, other plans and projects in the vicinity of the landfall include the Inch Cape export cable corridor, which overlaps with the proposed SG1A alternative cable installation methodology application boundary. There are no other proposed or existing cable or pipeline installation projects at the cable landfall. The SG1A Offshore Export Cable EIAR (SG1A, 2021) did not identify any significant cumulative effects at the landfall. The alternative cable landfall installation methodology forms part of the wider Seagreen Project and no significant cumulative effects are anticipated on any environmental receptor with the wider cable installation activities.

#### (c) Natural resources

In respect of the use of natural resources, installation of the cable using trenching methods would necessitate the removal of material during excavation of the cable trench, however this would be



temporary during the construction phase and the material would be reinstated and surveyed to ensure reinstatement to a similar profile. Therefore, the installation methodology would not result in the long-term exploitation of significant volumes of natural resources. Thus, no significant adverse effects on the environment through the use of natural resources are anticipated.

**(d) Production of waste and**

**(e) Pollution and nuisances**

All wastes will be managed in line with an Environmental Management Plan (EMP) which will be prepared for the Proposed Works. The EMP will include waste management measures to minimise, reuse, recycle and disposal of waste streams in compliance with relevant waste legislation. Marine pollution prevention and contingency planning measures will also be set out in a Marine Pollution Contingency Plan (MPCP) which will be prepared for the Proposed Works. The EMP and MPCP will likely form a consent requirement of any awarded Marine Licence for the alternative cable landfall methodology. Nuisance will be controlled by planning conditions through the submission and approval of an EMP which will contain proposed measures for the mitigation of construction noise and vibration, and dust. Due to the measures in place to control and/or manage waste, pollution and nuisance, which are expected to be secured by consent conditions, significant adverse effects on the environment are not predicted.

**(f) Major accidents and disasters**

Regarding risk of major accidents and/or disasters, including those caused by climate change, SG1A will require all contractors and subcontractors to complete adequate risk assessments for all aspects of the installation activities and these requirements will be captured within a Construction Method Statement which will be prepared for the Proposed Works (and again is likely to be secured through any awarded Marine Licence for the alternative cable landfall methodology). The Proposed Works will be a notifiable project for the purposes of the Construction (Design and Management) Regulations 2015 (CDM Regulations), and SG1A will require compliance with the CDM Regulations in the design of the Proposed Works and through the completion of the installation process through conditions of contract. Management standards in line with ISO 9001, 14001 and OHSAS 18001 will be applied for the overall SG1A project management system, and the management systems of all contractors will be required to concur with the same principles.

**(g) Risks to human health**

In relation to risks to human health, SG1A will require compliance with the Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH Regulations) through conditions of contract in ensuring that the risk to health from workplace exposure to hazardous substances is appropriately assessed and that exposure is prevented or, where this is not reasonably practicable, adequate controls are implemented and exposure monitored and managed to within acceptable levels, in line with relevant regulations. Health and Safety regulations will be adhered to at all times and relevant Health and Safety Executive (HSE) Management tools implemented, to ensure the safety of the workforce and the general public.

## Summary

SG1A have assessed the characteristics of the Proposed Works against each of the selection criteria in Schedule 3 of the 2017 Regulations.

In summary, we consider that the Proposed Works are relatively small in scale as they will take place within the existing consented SG1A Project corridor and involve the installation of a single trench. The Proposed Works are relatively minor in the context of the overall scale of the consented SG1A Project and Seagreen Project and in the context of the wider Cockenzie area, and are not likely to result in significant cumulative effects with other plans and projects. The use of natural resources within the intertidal and subtidal zones will be temporary and reversible with any removed material being backfilled following completion. The Proposed Works will be short term only (up to five months) and measures will be put in place to control and manage waste, pollution and nuisance, risk of accidents and risk to human health. Therefore, for the reasons outlined above, it is considered that the characteristics of the Proposed Works are not likely to result in significant adverse effects on the environment and the Proposed Works are not an EIA project under the 2017 Regulations. As such, we consider that an EIA is not required to be carried out in respect of the Proposed Works.

### 3.1.2 Location of the Proposed Works

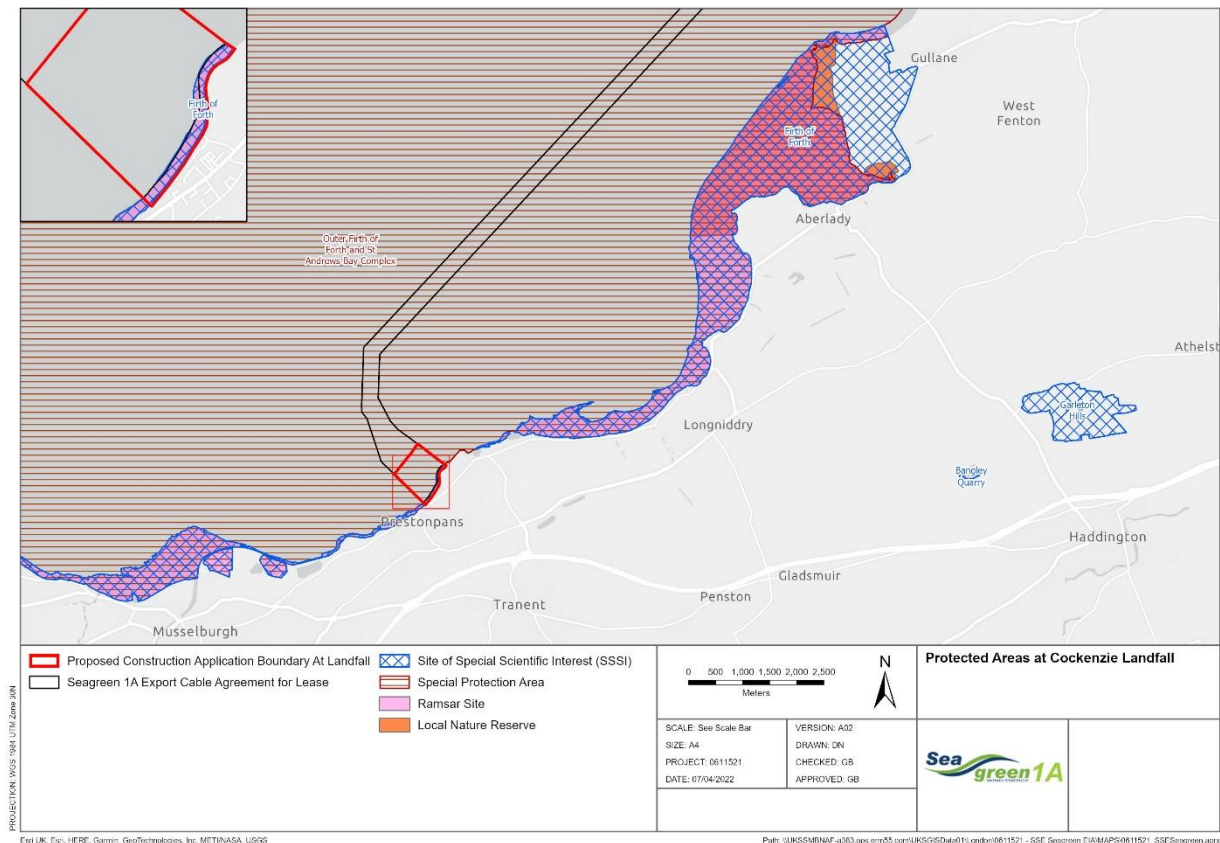
The 2017 Regulations specify that the environmental sensitivity of geographical areas likely to be affected by Proposed Works must be considered having regard to the following:

- the existing and approved land use;
- the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- the absorption capacity of the natural environment, paying particular attention to the following areas:
  - wetlands, riparian areas, river mouths;
  - coastal zones and the marine environment;
  - mountain and forest areas;
  - nature reserves and parks;
  - European sites and other areas classified or protected under national legislation;
  - areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
  - densely populated areas; and
  - landscapes and sites of historical, cultural or archaeological significance.

The Proposed Works are located between the built-up areas of Prestonpans to the west and Cockenzie to the east. As shown in Figure 3.1, the Proposed Works overlaps with the Outer Firth of Forth and St Andrews Bay Complex Special Protected Area (SPA) and the Firth of Forth SPA, a Site of Special Scientific Interest (SSSI) and Ramsar site. The Proposed Works will temporarily disturb a very small proportion (<0.00005%) of the total 2,721 km<sup>2</sup> area of the Outer Firth of Forth and St Andrews Bay Complex SPA (NatureScot, 2016). The Proposed Works will also temporarily disturb a very small proportion (<0.0001%) of the total 63.2 km<sup>2</sup> area of the Firth of Forth SPA, SSSI and Ramsar site, with approximately 60 m of open cut trench length

passing through the site (NatureScot, 2020). Impacts are not expected to be significant in terms of the EIA regulations.

Figure 3.1 - Protected Sites in Proximity to Cockenzie Landfall



SG1A will consider the environmental sensitivity of the landfall location in relation to these designations within the Environmental Appraisal. The Appraisal will consider the existing and approved use, the relative abundance, availability, quality and regenerative capacity of natural resources in the area, and the absorption capacity of the natural environment (with reference to coastal zones and European and nationally designated sites).

### 3.1.3 Characteristics of Potential Impacts

Regulation 10 of the 2017 Regulations require that the likely significant effects of the works on the environment are considered with regard to the impact of the works taking into account the following:

- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- the nature of the impact;
- the transboundary nature of the impact;

- the intensity and complexity of the impact;
- the probability of the impact;
- the expected onset, duration, frequency and reversibility of the impact;
- the cumulation of the impact with the impact of other existing and/or approved works; and
- the possibility of effectively reducing the impact.

The potential environmental impacts scoped into the proposed Environmental Appraisal are presented in Section 4. SG1A will assess each of these potential impacts in relation to the magnitude and spatial extent of the impact, the nature of the impact, the intensity and complexity of the impact and the probability, duration, frequency and reversibility of the impact, and the possibility to effectively manage and mitigate impacts, to determine whether or not the impact is likely to have an adverse effect on the environment.

#### 3.1.4 Management and Mitigation Measures

There are a number of management measures which have been incorporated into the methodology to reduce potential effects on the environment. These are summarised below and will be further described within the Environmental Appraisal.

1. Selection of appropriate construction plant: to reduce the potential for over-excavation and reduce delays during construction.
2. Working and stockpiling areas: working and stockpiling areas would be kept to a minimum size during the construction phase.
3. Soil handling: excavation of material along each trench would be undertaken in separate sediment layers and material of different grades would be stored separately within temporary stockpile areas. In the intertidal area, berms will be created to store the material which will be flattened to ensure that the berms do not become too high.
4. Intertidal reinstatement: reinstatement in the intertidal zone will be undertaken on a 'layer by layer' basis in reverse order to the excavation sequence. This reduces potential for adverse effects on the sediment structure and profile within the affected area.
5. It is anticipated that any consent for the alternative landfall cable installation method would be subject to conditions including the requirement for pre-construction consents management plans, to ensure good industry practice is adhered to in relation to environmental management, pollution prevention and waste management. These are likely to include an Environmental Management Plan (EMP) and Marine Pollution Contingency Plan (MPCP).
6. Bunding and drip catchment for hydraulic oils and fuels will be employed.

In addition to these specific measures, there are also industry standard measures that will be in place to further mitigate impacts on a wide range of receptors. These measures will be detailed within the Environmental Appraisal.

#### 3.1.5 Conclusion

In summary, SG1A propose any potential impacts associated with the Proposed Works are identified and mitigated within a concise Environmental Appraisal as described in Section 4.

### 3.2 Consideration of the Need for Pre-Application Consultation (PAC)

Applicants for Marine Licences for certain prescribed classes of activities are required to carry out PAC under the PAC Regulations. One of the prescribed classes of activities is the deposit of a submarine cable in the sea or on or under the seabed from a vehicle, vessel, aircraft, marine structure or floating container, but only where that cable:

1. exceeds 1,853 metres in length; and
2. crosses the intertidal boundary.

As described in the Project Description, the export cable to be installed via trenching will be a maximum of 825 m in length (intertidal, subtidal and onshore), therefore the first of these criteria is not met. The cable does cross the intertidal boundary, however the PAC Regulations state that both criteria need to be met for the works to be a prescribed class of activity.

SG1A therefore considers that formal PAC under the PAC Regulations is not required.

#### 4. Scope of Environmental Appraisal

As noted in the previous sections, SG1A proposes that the Marine Licence application for the Proposed Works is accompanied by a concise environmental assessment, presented in an Environmental Appraisal. Table 4.1 sets out the receptors and potential impacts on those receptors that are proposed to be scoped in to and out of the Environmental Appraisal, for agreement with MS-LOT. The assessments in the Environmental Appraisal will be based on existing environmental information available from the SG1A Offshore Export Cable EIAR (SG1A, 2021) and other publicly available sources where relevant.

*Table 4.1 - Topics Proposed to be Scoped In or Out of the Environmental Appraisal*

Topic	Scoping In / Out	Justification
Nature Conservation Designations and Other Designations	Scoped In	The Proposed Works overlap with a small proportion of the Outer Firth of Forth and St Andrews Bay Complex SPA and the Firth of Forth SPA, SSSI and Ramsar site.
Physical Environment and Water Environment	Scoped In	The Proposed Works have the potential to affect sediment transport processes, suspended sediment concentrations and the geomorphological features designated as part of the Firth of Forth SSSI.
Benthic Ecology and Intertidal Ecology	Scoped In	The Proposed Works have the potential to result in effects from temporary habitat disturbance and from changes in suspended sediment concentrations.
Natural Fish and Shellfish Resource	Scoped In	The Proposed Works have the potential to result in effects from temporary habitat disturbance, from changes in suspended sediment concentrations and disturbance due to underwater noise
Marine Mammals	Scoped In	The Proposed Works have the potential to result in effects from disturbance due to underwater noise.
Ornithology	Scoped In	The Proposed Works have the potential to result in effects from disturbance and is occurring within a small portion of the Outer Firth of Forth and St Andrews Bay Complex SPA and the Firth of Forth SPA.
Commercial Fisheries	Scoped Out	Commercial fisheries have been scoped out due to the shallow waters and the lack of fishing activity close to shore.
Shipping and Navigation	Scoped Out	Shipping and navigation have been scoped out due to the shallow waters and the low vessel traffic close to shore.

Topic	Scoping In / Out	Justification
Archaeology and Cultural Heritage	Scoped In	The Proposed Works have the potential to affect marine archaeology through direct impact to the seabed/foreshore or through finds of archaeological interest being identified during trenching activities.
Aviation, Military and Communications	Scoped Out	Aviation, military and communications has been scoped out due to the Proposed Works not interacting with any aviation, military or communication activities.
Other Marine Users and Activities	Scoped In	The Proposed Works have the potential to affect the activities of infrastructure and other user receptors in the vicinity, including recreational receptors.
Seascape, Landscape and Visual Amenity	Scoped Out	Seascape, landscape and visual amenity has been scoped out of the Environmental Appraisal on the basis that the EIAR (SG1A, 2021) scoped it out of assessment and that the Proposed Works are temporary, reversible and over a short period of time (five months) and are unlikely to increase the magnitude of potential impacts at the landfall.
Air Quality	Scoped Out	Air quality has been scoped out of the Environmental Appraisal on the basis that good practice measures will be in place to reduce dust and emissions, as described in Section 3.1.4.
Human Health	Scoped Out	SG1A will require compliance with the COSHH Regulations as discussed in Section 3.1.4 in ensuring that the risk to health is appropriately assessed and that exposure is prevented or, where this is not reasonably practicable, adequate controls are implemented and exposure monitored and managed to within acceptable levels in line with relevant regulations. Health and Safety regulations will be adhered to at all times and relevant HSE Management tools implemented to ensure the safety of the workforce and the general public. Therefore, significant effects to human health are not expected and it is scoped out of the assessment.
Climate Change	Scoped Out	Climate change is scoped out as any effects from the presence of vessels and vehicles and associated emissions will be small scale and temporary and are



Topic	Scoping In / Out	Justification
		unlikely to add significantly to any risks related to climate change.
Flood Risk	Scoped Out	Flood risk will be considered within the onshore application.

## 5. References

NatureScot (2018) CITATION FOR SPECIAL PROTECTION AREA (SPA), Firth of Forth (UK9004411), Available at <https://apps.snh.gov.uk/sitelink-api/v1/sites/8499/documents/16> , accessed October 2021.

NatureScot (2020) CITATION FOR SPECIAL PROTECTION AREA (SPA), Outer Firth of Forth and St Andrews Bay Complex (UK9020316), Available at <https://apps.snh.gov.uk/sitelink-api/v1/sites/10478/documents/16>, accessed October 2021.

SG1A (2021) Seagreen 1A: Offshore Export Cable Corridor Environmental Impact Assessment Report; Volume 1: Main Text, Available at [https://marine.gov.scot/datafiles/lot/seagreen-1A/EIA\\_Report-Volume\\_1-Main\\_Text.pdf](https://marine.gov.scot/datafiles/lot/seagreen-1A/EIA_Report-Volume_1-Main_Text.pdf) , accessed October 2021.