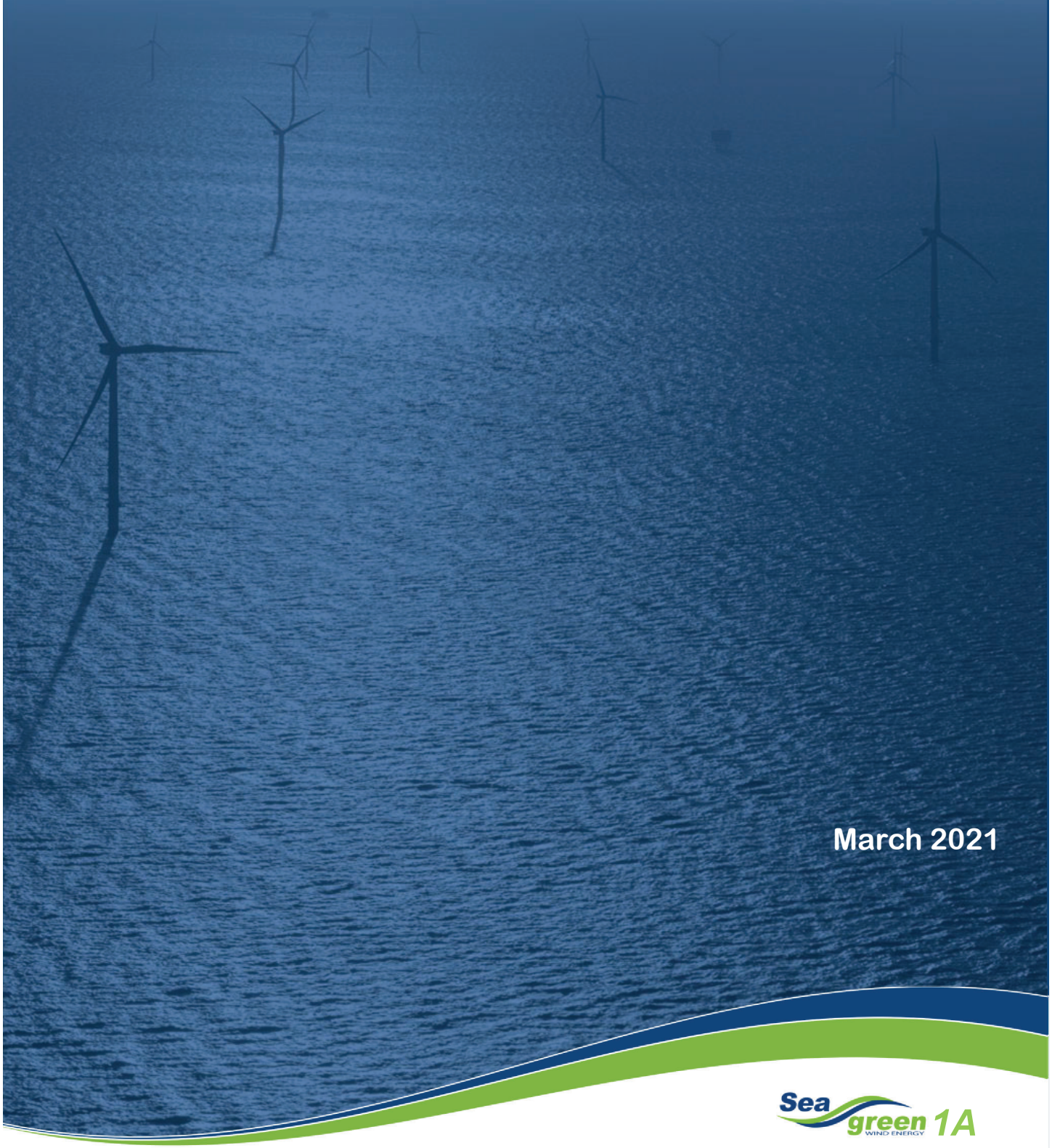
Seagreen 1A: Offshore Export Cable Corridor

Marine Licence Application



March 2021

Sea green 1A WIND ENERGY

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The Scottish Government
Riaghaltas na h-Alba

Marine Licence Application for Construction Projects

Version 1.0

Marine (Scotland) Act 2010

Marine Scotland, 375 Victoria Road, Aberdeen, AB11 9DB
http://www.gov.scot/Topics/marine/Licensing/marine

Acronyms

Please note the following acronyms referred to in this application form:

BPEO	Best Practicable Environmental Option
EIA	Environmental Impact Assessment
ES	Environmental Statement
MHWS	Mean High Water Springs
MMO	Marine Mammal Observer
MPA	Marine Protected Area
MS-LOT	Marine Scotland – Licensing Operations Team
PAM	Passive Acoustic Monitoring
SAC	Special Area of Conservation
SNH	Scottish Natural Heritage
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
WGS84	World Geodetic System 1984

Explanatory Notes

The following numbered paragraphs correspond to the questions on the application form and are intended to assist in completing the form. These explanatory notes are specific to this application and so you are advised to read these in conjunction with the Marine Scotland Guidance for Marine Licence Applicants document.

1. Applicant Details

The person making the application who will be named as the licensee.

2. Agent Details

Any person acting under contract (or other agreement) on behalf of any party listed as the applicant and having responsibility for the control, management or physical deposit or removal of any substance(s) or object(s).

3. Payment

Indicate payment method. Cheques must be made payable to: The Scottish Government.

Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.

4. Application Type

Indicate if the application is for a new construction site or an existing construction site. Provide the existing or previous consent/licence number and expiry date if applicable.

5. Project Details

(a) Give a brief description of the project (e.g. construction of a new sea outfall).

(b) Provide the total area of proposed works in square metres.

(c) Provide the proposed start date of the project. The start date will not be backdated, since to commence a project for which a licence has not been obtained will constitute an offence, which may result in appropriate legal action. A licence is normally valid for the duration of the project but not exceeding 3 years. If a project will not be completed before a marine licence lapses, it will be necessary for licence holders to re-apply for a further licence to continue any ongoing work at least 14 weeks prior to the expiry date of the licence. **Target duration for determination of a marine licence application is 14 weeks.**

(d) Provide the proposed completion date of the project.

(e) Provide the cost of the works seawards of the tidal limit of MHWS. This estimate should only cover

work taking place below the tidal level of MHWS and must take into consideration the cost of materials, labour fees etc.

(f) Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the proposed project. WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84. In a few cases, (e.g. laying of long pipelines) it may only be practicable to supply co-ordinates for the start and end points.

Example: For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44''N 2°22'11''W (WGS84).

It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.

To supplement your application, please provide photographs of the project location and submit these with your application. Please also provide a suitably scaled extract of an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which must be marked to indicate:

- the full extent of the works in relation to the surrounding area;
- latitude and longitude co-ordinates defining the location of the works;
- the level of MHWS;
- any adjacent SAC, SPA, SSSI, MPA, Ramsar or similar conservation area boundary.

Drawings and plans will be consulted upon. If they are subject to copyright, **it is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application.**

Sewer outfalls, discharge pipes for industrial waste etc. The size and description of the pipe must be shown on the longitudinal sections and also details of its supports, foundations, methods of jointing and details of any tidal flaps.

Bridges over tidal waters: An elevation with longitudinal and cross-sections of the bridge to a suitable scale must show the dimensions of the spans and width of piers, etc. above and below MHWS and the maximum and minimum heights of the undersides of the superstructures above MHWS. The headroom above MHWS and the width of span of the nearest bridges, if any, above and below the site must be stated.

Tunnels under tidal waters: The longitudinal section of the tunnel must show the distances between the bed of the river or estuary and the top of the tunnels. Cross-sections must show the internal and external dimensions of the tunnel and particulars of construction. When a proposed future dredging level is known this must also be shown on all sections.

Overhead cables: Catenary must be supplied in addition to the site plan showing the minimum clearance of the cable at MHWS and the electrical clearance allowed.

(g) Indicate if the project is located within the jurisdiction of a statutory harbour authority and provide details of the statutory harbour authority where relevant.

(h) Provide a full method statement, including schedule of works and the ultimate fate of the structure.

(i) Provide assessment of the potential impacts the works may have, including interference with other uses of the sea. Please include details of areas of concern e.g designated conservation areas, such as a SAC, SPA, SSSI, MPA or Ramsar site and shellfish harvesting areas. Further guidance on designated conservation areas can be obtained from SNH at this website:

http://gateway.snh.gov.uk/sitelink/index.jsp and guidance on shellfish harvesting areas can be obtained from http://www.foodstandards.gov.scot/ with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

Applicants should also be aware of the need to pay due regard to coastal and marine archaeological matters and attention is drawn to Historic Scotland's Operational Policy Paper HP6, "Conserving the Underwater Heritage".

Any application for beach replenishment works must be cross checked as to whether the proposed site is a designated bathing water site. If so, all physical works should ideally be done outwith the Bathing Water Season (1st June to 15th September). Further guidance on the Bathing Waters Directive (2006/7/EC) can be obtained from http://apps.sepa.org.uk/bathingwaters/.

Where there are potential impacts from the works, please provide details of proposed mitigation, such as use of MMOs or PAM, in response to potential impacts.

6. Deposits and/or Removals

(a) Complete the table to indicate all permanent substances or objects to be deposited and/or removed from below MHWS. If you propose using types of substances or objects for which a specific box is not provided in the table, please describe the nature of such substances or objects in the box marked "other".

(b) Please indicate the method of delivery of any substance(s) or object(s) to be placed below MHWS.

(c) Where the proposed work involves salt marsh feeding, beach replenishment or land reclamation the description of the substances or objects must include details of its chemical quality. Where the substances or objects have not been chemically analysed, MS-LOT may request representative samples for analysis or require the applicant to arrange for analyses to be undertaken before the marine licence application can be determined.

(d) If temporary deposits are required, please provide details as with the permanent deposits above. The temporary deposit location details (Latitude and Longitude WGS84) must be added to the form, and the period of time the site will be used must be provided. If granting a licence, MS-LOT will include on the document details of any area that has been approved as a temporary deposit site.

7. Disposal of Dredged Substance(s) or Object(s) at Sea

(a) If you are proposing to dispose of any excess substance(s) or object(s) arising from the project at sea, a separate marine licence will be required (see Dredging and Sea Disposal application form). The granting of a marine licence for construction projects does not imply that a marine licence for sea disposal will also be granted as different assessment criteria are used to determine each type of application. If a separate application is being submitted for dredging and sea disposal then this must be accompanied with a BPEO report.

(b) Provide the quantity of dredged substance(s) or object(s) for sea disposal in wet tonnes.

8. Noise Monitoring

Under the Marine Strategy Regulations (2010), there is now a requirement to monitor loud, low to mid frequency (10Hz to 10kHz) impulsive noise. Activities where this type of noise is produced include seismic airguns, other geophysical surveys (<10kHz), pile driving, explosives and certain acoustic deterrent devices. Where noisy activity is being undertaken, you must complete an initial registration form for the noise registry which allows you to provide details on the proposed work. Completion of a 'close-out' form, which allows licensees to provide details of the actual dates and locations where the activities occurred, is also required within 12 weeks of the completion of the 'noisy' activity or, in the case of prolonged activities such as piling for harbour construction or wind farms, at quarterly intervals or after each phase of foundation installation.

These forms can be downloaded from:
http://www.scotland.gov.uk/Topics/marine/science/MSInteractive/Themes/noise-reduction

Marine licence applications will not be accepted until this form has been completed and submitted.

9. Statutory Consenting Powers

Please describe in the answer to this question what (if any) statutory responsibilities you (or your client) have to consent any aspect of the project.

10. Scotland's National Marine Plan

Scotland's National Marine Plan has been prepared in accordance with the EU Directive 2014/89/EU, which came into force in July 2014. The Directive introduces a framework for maritime spatial planning and aims to promote the sustainable development of marine areas and the sustainable use of marine resources. It also sets out a number of minimum requirements all of which have been addressed in this plan. In doing so, and in accordance with article 5(3) of the Directive, Marine Scotland have considered a wide range of sectoral uses and activities and have determined how these different objectives are reflected and weighted in the marine plan. Land-sea interactions have also been taken into account as part of the marine planning process. Any applicant for a marine licence should consider their proposals with reference to Scotland's National Marine Plan. A copy of Scotland's National Marine Plan can be found at: http://www.gov.scot/Publications/2015/03/6517/0

Indicate whether you have considered the project with reference to Scotland's National Marine Plan and provide details of considerations made with reference to the policies, including but not limited to General Policies 7 and 13 (GEN 7 and GEN 13), that have been considered. If you have not considered the project with reference to Scotland's National Marine Plan please provide an explanation.

11. Pre-Application Consultation

Certain activities will be subject to public pre-application consultation. Activities affected will be large projects with the potential for significant impacts on the environment, local communities and other legitimate uses of the sea. The new requirement will allow those local communities, environmental groups and other interested parties to comment on a proposed development in its early stages – before an application for a marine licence is submitted. Further information can be obtained from: http://www.scotland.gov.uk/Resource/0043/00439649.pdf

If applicable, please provide your pre-application consultation report with your application.

12. Consultation (other than carried out under pre-application consultation)

Provide details of all bodies consulted and give details of any consents issued including date of issue.

13. Environmental Assessment

(a) Under the Marine Works Environmental Impact Assessment (EIA) Regulations 2007, there may be a requirement for certain projects to undergo an EIA and produce an ES. If EIA is required, MS-LOT will not determine a marine licence application until the EIA consent decision in respect of the marine licence application has been reached. Please confirm if the project falls under Annex I or II of Directive 85/337/EEC: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0092&from=EN in relation to the Marine Works (EIA) Regulations 2007.

Marine licence applications for proposals which fall under the regulations will not be accepted unless a screening opinion has been issued in relation to this.

(b) Please indicate if an EIA has been undertaken and whether it was for the marine licence application to which this application relates or for any other EIA regulator (e.g local authority). Please attach any previous ES to the application.

MS-LOT will not determine a marine licence application until the EIA consent decision in respect of any regulated activity associated with the marine licence application has been reached.

14. Associated Works

Indicate whether the application is associated with any other marine projects (e.g. land reclamation, marine/harbour construction works, dredging and sea disposal etc). If this is the case, provide reference/licence number for the related marine projects.

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It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Section 54 of the Marine (Scotland) Act 2010, all information contained within and provided in support of this application will be placed on a Public Register. There are no national security grounds for application information not going on the Register under the 2010 Act.

Public Register

Do you consider that any of the information contained within or provided in support of this application should not be disclosed:

(a) for reasons of national security; YES ☐ NO ☐

(b) for reasons of confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☐

If **YES**, to either (a) or (b), please provide full justification as to why all or part of the information you have provided should be withheld.

Not applicable.

WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

Target duration for determination is 14 weeks. Please note that missing or erroneous information in your application and complications resulting from consultation may result in the application being refused or delayed.

Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.

Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

Signature [redacted] Date 5 March 2021

Name in BLOCK LETTERS STEPHEN MCKEOWN ON BEHALF OF SEAGREEN 1A LTD.

Application Check List

Please check that you provide all relevant information in support of your application, including but not limited to the following:

- Completed and signed application form ☑
- Project Drawings ☑
- Maps/Charts ☑
- Co-ordinates of the boundary points of the area of harbour jurisdiction (if you are a statutory harbour authority) ☐
- Method Statement ☑
- Photographs of the location of the project ☐
- Additional information e.g. consultation correspondence (if applicable) ☑
- Noise Registry – Initial Registration Form (if applicable) ☑
- Pre-application Report (if applicable) ☑
- Environmental Statement (if applicable) ☑
- Payment (if paying by cheque) ☐

1. Applicant Details

Title: Mr Initials: S Surname: McKeown

Trading Title (if appropriate): Seagreen 1A Limited

Address: SSE Renewables, Waterloo Street, Glasgow, G2 6AY

Name of contact (if different):

Telephone No. (inc. dialing code): [redacted]

Email: stephen.mckeown@sse.com

Statutory Harbour Authority? YES ☐ NO ☐

If **YES**, please provide a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the area of harbour jurisdiction using Appendix 01 Additional Co-ordinates form if necessary.

2. Agent Details (if any)

Title: Initials: Surname:

Trading Title (if appropriate):

Address:

Name of contact (if different):

Telephone No. (inc. dialing code):

Email:

3. Payment

Enclosed Cheque ☐ Invoice ☐

Contact and address to send invoice to:

Applicant ☐ Agent ☐ Other ☐

If **OTHER**, please provide contact details:

Title: Initials: Surname:

Address:

Email:

4. Application Type

Is this application for a new construction site or an existing construction site:

New Site ☐ Existing Site ☐

If an **EXISTING SITE**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date
Not applicable	Not applicable

5. Project Details

(a) Brief description of the project (e.g. construction of a new sea outfall):

In February 2020, Seagreen received a grid offer from National Grid for the Cockenzie substation in East Lothian with Transmission Entry Capacity (TEC) of 360MW. This was accepted by Seagreen in June 2020, with a connection date of October 2023. The SG1A Project, comprises one high voltage offshore export cable to mean high water springs (MHWS), cable landfall and connection to the onshore infrastructure. Scour protection and cable protection may also be required.

The proposed export cable infrastructure of the SG1A Project will transmit electricity from up to 36 WTGs already consented in the Seagreen Project Area, via an OSP also consented under the Seagreen Project, to the new landfall location at Cockenzie.

The EIAR covers the single offshore export cable infrastructure up to MHWS in support of the SG1A Project Marine Licence application. Further information detailed in Section 1A Export Cable Environmental Impact Assessment Report (Document number: LF000012-CST-OF-LIC-DEV-REP-0003).

(b) Total area of the proposed works (in square metres):

277,094,600 m^2

(c) Proposed start date **(Target duration for determination of a marine licence application is 14 weeks):**

April 2023

(d) Proposed completion date:

June 2024

(e) Cost of the works seawards of the tidal limit of MHWS:

£20-50M

(f) Location:

Located in the North Sea, in the outer Firth of Forth and Firth of Tay region. See attached figure, appendix 1 table of coordinates and also detailed information in Section 3 of the Seagreen 1A Export Cable Environmental Impact Assessment Report (Document number: LF000012-CST-OF-LIC-DEV-REP-0003).

Latitude and Longitude co-ordinates (WGS84) defining the extent of the project (continue on Appendix 01 Additional Co-ordinates form if necessary):

Latitude											**Longitude**										
		°			.				' N					°			.				' W
		°			.				' N					°			.				' W
		°			.				' N					°			.				' W
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		°			.				' N					°			.				' W
		°			.				' N					°			.				' W

(g) Is the project located within the jurisdiction of a statutory harbour authority?

YES ☐ NO ☐

If **YES**, please specify statutory harbour authority:

Forth Ports

(h) Method statement including schedule of work (continue on separate sheet if necessary):

Seabed Preparations Prior to offshore cable installation, linear seabed debris will be removed by grapnel tow (PLGR). Areas of boulders and confirmed Unexploded Ordinances (UXO) may also require clearance if not avoidable by a minor cable route deviation. Pre-sweeping may be required in order for the burial techniques to be employed effectively. If the debris is hooked, it will be cleared.

Cable pull-in at the OSP will see the Cable Protection System fitted to the cable end on board. (specific mechanical protection applied to protect the cable as it enters the OSP Jtube bellmouth). A ROV will recover a pre-installed messenger wire within the JTube. The wire will be winched to deck and connected to the sealed cable end. The cable will be winched into the OSP.

At the Cockenzie landfall location, a trenchless installation technique will be used to install a cable duct from the transition pit location (located onshore above MHWS and subject to a separate planning application) and out to approximately Mean Low Water Springs (MLWS). The cable will be pulled to shore from an offshore vessel suspended by floats. The cable will be drawn through the ducts to the transition pit by a winch. Cables seaward of the pipe ends will be protected by jetting or trench excavation. For any trenchless installation operations, the maximum drill rig area is expected to be of the order of 50 m by 50 m. The equipment to be used includes the drilling rig and drill spoil processing equipment. For the cable pull in, a temporary winch will be required to draw the cable.

Cable testing will be performed at various stages during the cable lay operations. Consideration will be given to limiting light spill (by directional lighting, directed downwards) from construction vessels involved in cable laying and related activities at night within 2km of the shore, to avoid visual intrusion at residential locations. The cable is trenched into the seabed to the target depth. A jetting tool will inject water at high pressure into the sediment surrounding the cable. The seabed is temporarily fluidised and the cable is lowered.
If target depth has not been reached, a second trenching pass will be completed to improve the first pass. If necessary, an engineered cable protection solution will further protect any areas of cable not trenched to the required depth (rock armouring, concrete mattressing, or rock placement). Rock protection is usually deposited by a fall pipe vessel.

Immediately following installation, post installation surveys will be conducted to confirm target burial depths have been achieved or where cable protection measures will be required (as outlined above). During the period between the identification of the need for additional cable protection and completion of additional cable protection activities, a Guard Vessel will be on site to inform other marine users of activities within the area.

Monitoring will be undertaken post installation to confirm the cables remain as installed. Monitoring will be determined via a risk-based assessment which will provide a proportional indication of the risk of future cable exposure along the interconnector cable corridor.

The indicative construction programme for the SG1A Project commences in Q2 2023 and completes in Q2 2024. SG1A Project offshore export cable construction activities are expected to take place 24/7 and at any time of the year for a maximum of 15 weeks, although this may not be concurrent.

For further details please see Section 3 Seagreen 1A Export Cable Environmental Impact Assessment (LF000012-CST-OF-LIC-DEV-REP-0003)

(i) Potential impacts the works may have (including details of areas of concern e.g designated conservation and shellfish harvesting areas) and proposed mitigation in response to potential impacts (continue on separate sheet if necessary):

The potential environmental impacts of the SG1A Project have been assessed using a systematic approach to EIA, in accordance with the Marine Works (EIA) (Scotland) Regulations 2017. The Seagreen 1A Export Cable Environmental Impact Assessment Report (LF000012-CST-OF-LIC-DEV-REP-0003) describes the potential impacts of the SG1A Project throughout construction, operation and decommissioning for both project alone and cumulatively with other relevant infrastructure projects. The Seagreen 1A Export Cable Nature Conservation Appraisal Report has been produced(LF000012- CST-OF-LIC-DEV-REP-0002) to provide detailed assessment of the SG1A Project s potential for effect on protected sites designated for their nature conservation interests.

The Seagreen 1A Export Cable Corridor Environmental Impact Assessment Report(LF000012-CST-OF-LIC-DEV-REP-0003) considers the impact on the following receptors natural fish and shellfish resource (Section 7); Marine Mammals (Section 8); Commercial Fisheries (Section 9); Shipping and Navigation (Section 10); Marine Archaeology (Section 11).

The Seagreen 1A Export Cable Corridor Environmental Impact Assessment Report(LF000012-CST-OF-LIC-DEV-REP-0003) presents mitigation measures that are embedded into the design of the project are referred and are intended to prevent, reduce and where possible offset any significant adverse impacts on the environment (Section 4); and additional mitigation where the EIA process has identified impacts that are considered significant and for which additional mitigation is required, to remove or reduce impacts identified (Section 12).

6. Deposits and/or Removals

(a) **Permanent** substance(s) or object(s) to be deposited and/or removed from below MHWS (continue on a separate sheet if necessary):

	Deposits		Removals	
Type of Deposit/Removal	Description	Quantity & Dimensions (metric)	Description	Quantity & Dimensions (metric)
Steel/Iron	Cast iron segments	40 No. Dimensions 350 mm diameter by 500 mm length 2 tonnes Weight (kg/tonnes)		No. Dimensions Weight (kg/tonnes)
Timber		No. Dimensions Weight (kg/tonnes)		No. Dimensions Weight (kg/tonnes)
Concrete	Concrete mattresses	No. Dimensions 6 m by 3 m by 0.3 m depth 2000 tonnes Weight (kg/tonnes)		No. Dimensions Weight (kg/tonnes)
Plastic/Synthetic	HDPE Duct	1020 m^2		m^2
Clay (< 0.004 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)
Silt (0.004 ≤ Silt < 0.063 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)
Sand (0.063 ≤ Sand < 2.0 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)
Gravel (2.00 ≤ Gravel < 64.0 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)
Cobbles (64.0 ≤ Cobbles < 256.0 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)
Boulders (≥ 256.0 mm)		Volume (m^3) Weight (kg/tonnes)		Volume (m^3) Weight (kg/tonnes)

Pipe		Length (m) External Diameter (cm/m)		Length (m) External Diameter (cm/m)
Other (please describe below):				
Rock	Graded Rock 1-8 inches	24000 tonnes		
Rock Nets	4 tonne/unit (20 bags)	2 m diameter by 1m high; 80 tonnes		
Cable	138 kg/m	110 km; 15180 tonnes		
Grout bags	1 tonne/unit	1.5 m by 1.5 m by 1.5m 4000 tonnes		

(b) Method of delivery of substance(s) or object(s):

Materials will be delivered by sea. Please also see Method Statement above and Section 3 Seagreen 1A Export Cable Environmental Impact Assessment (LF000012-CST-OF-LIC-DEV-REP-0003)

(c) For work involving salt marsh feeding, beach replenishment or land reclamation please provide the following information relating to the substance(s) or object(s) to be deposited:

Quantity (tonnes):

N/A tonnes

Nature of substance(s) or object(s) (e.g. sand, silt, gravel etc.):

N/A

Source (if sea dredged state location of origin)

N/A

Particle size:

N/A

Have the substance(s) or object(s) been chemically analysed? **YES** ☐ **NO** ☐
If YES, please include the analysis data with your application

(d) **Temporary** substance(s) or object(s) to be deposited below MHWS (continue on a separate sheet if necessary):

Type of Deposit	**Description**	**Quantity & Dimensions** (metric)
Steel/Iron		No.
		Dimensions
		Weight (kg/tonnes)
Timber		No.
		Dimensions
		Weight (kg/tonnes)

Concrete		No.
		Dimensions
		Weight (kg/tonnes)
Plastic/Synthetic		m^2
Clay (< 0.004 mm)		Volume (m^3)
		Weight (kg/tonnes)
Silt (0.004 ≤ Silt < 0.063 mm)		Volume (m^3)
		Weight (kg/tonnes)
Sand (0.063 ≤ Sand < 2.0 mm)		Volume (m^3)
		Weight (kg/tonnes)
Gravel (2.00 ≤ Gravel < 64.0 mm)		Volume (m^3)
		Weight (kg/tonnes)
Cobbles (64.0 ≤ Cobbles < 256.0 mm)		Volume (m^3)
		Weight (kg/tonnes)
Boulders (≥ 256.0 mm)		Volume (m^3)
		Weight (kg/tonnes)
Pipe		Length (m)
		External Diameter (cm/m)
Other (please describe below):		

7. Disposal of Dredged Substance(s) or Object(s) at Sea

(a) Do you intend to apply for a marine licence for sea disposal of dredged substance(s) or object(s) as part of the project? YES ☐ NO ☐

If **YES**, please specify nature of substance(s) or object(s) (e.g sand, gravel, silt, clay, rock etc.):

(b) Quantity of substance(s) or object(s) (wet tonnes):

wet tonnes

A separate marine licence application will be required to be submitted for sea disposal.

8. Noise Monitoring

Will loud, low to mid frequency (10Hz to 10kHz) impulsive noise be produced by the project? YES ☐ NO ☐

If **YES**, which please indicate the noise generating activities and sound frequencies:

Noise Generating Activity	Sound Frequency (Hertz)
Use of Explosives	
Use of Accoustic Deterrent Devices	
Piling	
Other (please describe below):	
Geophysical surveys SBP	200Hz-10kHz
Geophysical survey activities covered by EPS/BS-00009152 and JNCC No. 2444	

If you have ticked **YES**, please complete the Noise Registry – Initial Registration form located at:
http://www.scotland.gov.uk/Topics/marine/science/MSInteractive/Themes/noise-reduction

Marine licence applications will not be accepted until this form has been completed and submitted.

9. Statutory Consenting Powers

Do you, or (if appropriate) your client, have statutory powers to consent any aspect of this project?

No.

10. Scotland's National Marine Plan

Have you considered the application with reference to Scotland's National Marine Plan? YES ☐ NO ☐

If **YES**, provide details of considerations made with reference to the policies, including but not limited to General Policies 7 and 13 (GEN 7 and GEN 13), that have been considered:

TUnder the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010, the Scottish Government is required to prepare a National Marine Plan (NMP) for Scottish territorial waters and the offshore zone. The Scottish Government adopted the Scottish NMP in early 2015 (Scottish Government, 2015) to provide an overarching framework for marine activity in Scottish waters, with an aim to enable sustainable development and the use of the marine area in a way that protects and enhances the marine environment, whilst promoting both existing and emerging industries. This is underpinned by a core set of general policies which apply across existing and future development and use of the marine environment. Sectoral policies are also outlined in the NMP where a particular industry brings with it issues beyond those set out in the general policies. For cable projects, in addition to the general planning policies, the policies covering sea fisheries and submarine electricity cables are of particular relevance.
The offshore SG1A Project has taken all the relevant aspects of the policies outlined below into consideration with regards to the cable installation, operation and decommissioning activities and the assessment of potential environmental and socio-economic impacts.
2.3.1.1 General Planning
The general planning policies of particular relevance to the offshore SG1A Project include:
• General planning – there is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of the NMP;
• Co-existence – proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision-making processes, when consistent with policies and objectives of this NMP;
• Climate change – marine planners and decision makers must act in the way best calculated to mitigate, and adapt to, climate change;
• Natural heritage – development and use of the marine environment must:
o Comply with legal requirements for protected areas and protected species;
o Not result in significant impact on the national status of Priority Marine Feature (PMF); and
o Protect and, where appropriate, enhance the health of the marine area.
• Noise – development and use in the marine environment should avoid significant adverse effects of manmade noise and vibration, especially on species sensitive to such effects (GEN 13);
• Landscape/seascape (GEN 7): Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape and visual impacts into account.
• Engagement – early and effective engagement should be undertaken with the general public and interested stakeholders to facilitate planning and consenting processes (GEN 18); and
• Cumulative impacts – cumulative impacts affecting the ecosystem of the NMP area should be addressed in decision making and NMP implementation (GEN 21).
2.3.1.3 Submarine Cables
With respect to submarine cables, the NMP sets out a number of key objectives. Those that are relevant to the offshore SG1A Project include:
• Protect submarine cables whilst achieving successful seabed user co-existence;
• Achieve the highest possible quality and safety standards and reduce risks to all seabed users and the marine environment; and
• Support the generation, distribution and optimisation of electricity from traditional and renewable sources to Scotland, UK and beyond.
2.3.1.2 Sea Fisheries
With respect to sea fisheries, the NMP sets out a number of policies. Those that are relevant to the offshore SG1A Project include:
Fisheries 1: Taking account of the EU's Common Fisheries Policy (CFP), Habitats Directive, Birds Directive and MSFD, marine planners and decision makers should aim to ensure:
• Existing fishing opportunities and activities are safeguarded wherever possible;
• Protection for vulnerable stocks (in particular for juvenile and spawning stocks through continuation of sea area closures where appropriate);
• That other sectors take into account the need to protect fish stocks and sustain healthy fisheries for both economic and conservation reasons; and
• Mechanisms for managing conflicts between fishermen and/or between the fishing sector and other users of the marine environment.
Fisheries 2: The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on fishing:
• The cultural and economic importance of fishing, in particular to vulnerable coastal communities;
• The potential impact (positive and negative) of marine developments on the sustainability of fish and shellfish stocks and resultant fishing opportunities in any given area;
• The environmental impact on fishing grounds (such as nursery, spawning areas), commercially fished species, habitats and species more generally; and
• The potential effect of displacement on fish stocks, the wider environment, use of fuel, socio-economic costs to fishers and their communities and other marine users.
Fisheries 3: Where existing fishing opportunities or activity cannot be safeguarded, a Fisheries Management and Mitigation Strategy should be prepared by the proposer of the development or use, involving full engagement with local fishing interests.

If **NO**, please provide an explanation of why you haven't considered the National Marine Plan?

11. Pre-Application Consultation

Is the application subject to pre-application consultation, under The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013? YES ☐ NO ☐

If **YES,** please indicate the date of the public notice for the pre-application consultation event and the type of consultation event held (a copy of the public notice must be supplied with this application):

Event Type	Date
Virtual exhibition PAC event. The exhibition had to be virtual due to COVID regulations: The Marine Works and Marine Licensing (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020. See Seagreen 1A Pre-Application Consultation Report (LF000012-CST-EV-LIC-DEV-REP-0001) Appendix A for a copy of the public notice.	3rd November 2020

12. Consultation

List all bodies you have consulted and provide copies of correspondence:

Regulatory bodies: Marine Scotland – Licencing Operations Team, NatureScot, Marine Scotland Science, Historic Environment Scotland, Crown Estate Scotland

Local councils: East Lothian Council, East Lothian Courier, Scottish Borders Council, Angus Council, Dundee City Council, Fife Council, Cockenzie & Port Seton Community Council.

Local developers: Inch Cape Offshore Limited, Neart na Gaoithe, Berwick Bank, Marr Bank.

Commercial fisheries: Scottish Fishermen's Federation, St Andrews Inshore Fishermen's Association, North and East Coast Inshore Fisheries Group, Arbroath Fisherman, under 10m association, Port Seton static gear fisherman, Port Seton harbourmaster, Cockenzie and Port Seton FA, Pittenweem FMA, Burnmouth/Eyemouth Fisherman, Dunbar Fishermen's Association, and commercial fishing vessel operators.

Shipping and Navigation: National Lighthouse Board, Maritime Coastguard Agency, Scottish Environment Protection Agency, Forth Ports, Royal Yachting Association (RYA), The Crusing Association, MCA, UK Chamber of Shipping.

Further details provided in Seagreen 1A Export Cable Corridor Pre-Application Report (LF000012-CST-OF-LIC-DEV-REP-0001) and Section 5 of the EIAR ()

13. Environmental Assessment

(a) Does the project fall under Annex I or II of the EIA Directive?

Annex I ☐ Annex II ■ Neither ☐

If **ANNEX I or ANNEX II**, please provide the screening opinion issued to you in relation to the project.

(b) Has an EIA been undertaken:

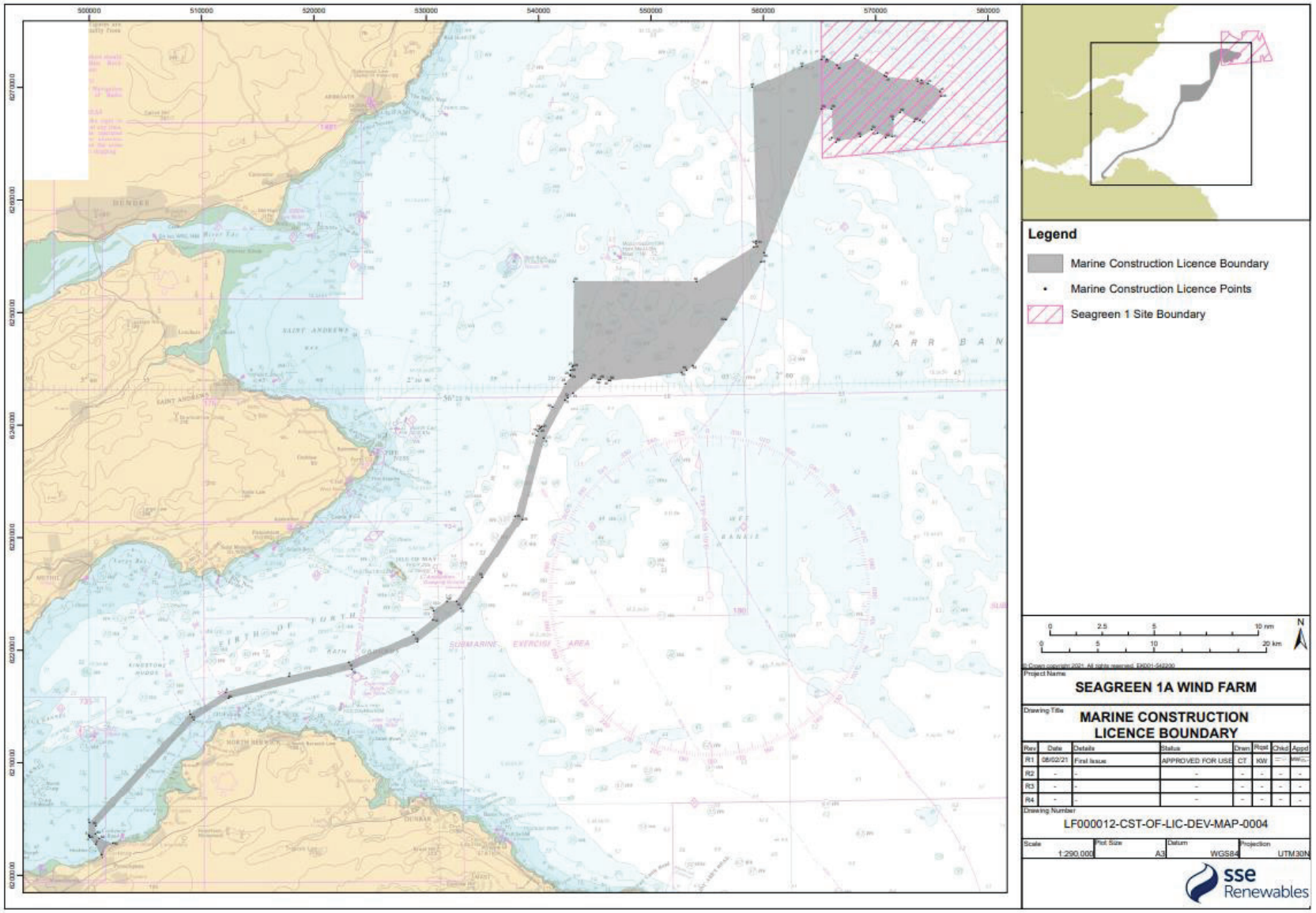
for the marine licence application to which this application relates YES ☐ NO ☐
for any other EIA regulator (e.g local authority) YES ☐ NO ☐

14. Associated Works

Provide details of other related marine projects, including reference/licence numbers (if applicable):

Seagreen 1A Offshore Wind Farm (previously known as Seagreen Alpha and Bravo).

Marine Licence Application Numbers:
Seagreen Alpha: 06798
Seagreen Bravo: 06799



Legend

- Marine Construction Licence Boundary
- Marine Construction Licence Points
- Seagreen 1 Site Boundary

0 2.5 5 10 nm
0 5 10 20 km
N

Project Name:
SEAGREEN 1A WIND FARM

Drawing Title:
MARINE CONSTRUCTION LICENCE BOUNDARY

Rev	Date	Details	Status	Drwn	Rqst	Chkd	Appd
R1	08/02/21	First Issue	APPROVED FOR USE	CT	KW	[illegible]	[illegible]
R2	-	-	-	-	-	-	-
R3	-	-	-	-	-	-	-
R4	-	-	-	-	-	-	-

Drawing Number:
LF000012-CST-OF-LIC-DEV-MAP-0004

Scale	Plot Size	Datum	Projection
1:290,000	A3	WGS84	UTM30N

sse Renewables

Ref	Latitude (WGS84 DDM)	Longitude (WGS84 DDM)
1	55° 57.698' N	2° 58.923' W
2	55° 58.226' N	2° 59.425' W
3	55° 58.535' N	2° 59.924' W
4	55° 58.600' N	3° 0.016' W
5	55° 58.671' N	3° 0.019' W
6	55° 59.245' N	2° 59.982' W
7	56° 4.428' N	2° 51.314' W
8	56° 5.482' N	2° 48.263' W
9	56° 6.255' N	2° 42.837' W
10	56° 6.907' N	2° 37.664' W
11	56° 8.199' N	2° 32.107' W
12	56° 8.894' N	2° 30.449' W
13	56° 9.337' N	2° 30.392' W
14	56° 9.789' N	2° 29.222' W
15	56° 9.785' N	2° 28.413' W
16	56° 13.842' N	2° 23.292' W
17	56° 17.688' N	2° 21.409' W
18	56° 17.905' N	2° 21.254' W
19	56° 18.007' N	2° 21.160' W

Ref	Latitude (WGS84 DDM)	Longitude (WGS84 DDM)
20	56° 18.061' N	2° 21.060' W
21	56° 18.156' N	2° 20.949' W
22	56° 19.078' N	2° 19.994' W
23	56° 20.184' N	2° 18.849' W
24	56° 20.532' N	2° 18.404' W
25	56° 20.609' N	2° 18.444' W
26	56° 20.824' N	2° 18.417' W
27	56° 20.987' N	2° 18.245' W
28	56° 21.022' N	2° 18.183' W
29	56° 25.066' N	2° 18.043' W
30	56° 24.998' N	2° 7.417' W
31	56° 26.619' N	2° 2.416' W
32	56° 26.744' N	2° 2.240' W
33	56° 26.862' N	2° 2.184' W
34	56° 34.247' N	2° 2.353' W
35	56° 35.241' N	1° 58.015' W
36	56° 35.561' N	1° 56.305' W
37	56° 35.547' N	1° 55.832' W
38	56° 35.259' N	1° 54.958' W

Ref	Latitude (WGS84 DDM)	Longitude (WGS84 DDM)
39	56° 35.549' N	1° 53.430' W
40	56° 34.702' N	1° 50.857' W
41	56° 34.643' N	1° 50.677' W
42	56° 34.423' N	1° 47.948' W
43	56° 34.459' N	1° 47.657' W
44	56° 34.283' N	1° 47.120' W
45	56° 33.926' N	1° 46.030' W
46	56° 33.702' N	1° 45.944' W
47	56° 32.526' N	1° 47.833' W
48	56° 32.502' N	1° 48.327' W
49	56° 32.956' N	1° 49.546' W
50	56° 32.624' N	1° 50.192' W
51	56° 31.824' N	1° 50.279' W
52	56° 31.751' N	1° 50.833' W
53	56° 31.975' N	1° 51.534' W
54	56° 32.134' N	1° 52.033' W
55	56° 31.818' N	1° 53.021' W
56	56° 31.559' N	1° 55.136' W
57	56° 31.801' N	1° 55.500' W

Ref	Latitude (WGS84 DDM)	Longitude (WGS84 DDM)
58	56° 33.162' N	1° 55.493' W
59	56° 33.164' N	1° 56.352' W
60	56° 26.295' N	2° 1.558' W
61	56° 25.885' N	2° 1.815' W
62	56° 23.131' N	2° 4.898' W
63	56° 20.989' N	2° 7.841' W
64	56° 20.750' N	2° 8.366' W
65	56° 20.664' N	2° 8.812' W
66	56° 20.286' N	2° 14.976' W
67	56° 20.298' N	2° 15.118' W
68	56° 20.362' N	2° 15.846' W
69	56° 20.365' N	2° 16.002' W
70	56° 20.425' N	2° 16.571' W
71	56° 19.720' N	2° 18.194' W
72	56° 19.475' N	2° 18.688' W
73	56° 19.397' N	2° 18.881' W
74	56° 17.545' N	2° 20.776' W
75	56° 13.682' N	2° 22.668' W
76	56° 10.916' N	2° 26.160' W

Ref	Latitude (WGS84 DDM)	Longitude (WGS84 DDM)
77	56° 9.435' N	2° 28.028' W
78	56° 7.866' N	2° 31.766' W
79	56° 6.561' N	2° 37.428' W
80	56° 5.188' N	2° 48.042' W
81	56° 4.154' N	2° 50.980' W
82	55° 59.095' N	2° 59.431' W
83	55° 58.727' N	2° 59.456' W
84	55° 58.496' N	2° 59.105' W
85	55° 58.255' N	2° 57.937' W

marinescotland

Scottish Government
Riaghaltas na h-Alba
gov.scot

E: ms.marinerenewables@gov.scot

Ms Kirstine Wood
Seagreen 1A Limited
c/o SSE plc
1 Waterloo Street
Glasgow
G2 6AY

Date: 19 February 2021

Dear Ms Wood,

Screening Opinion under The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) and The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Thank you for your screening opinion request dated 02 December 2020 in regards to the proposed construction of an offshore export cable and cable protection in the Firth of Forth and Firth of Tay to connect the Seagreen Alpha and Seagreen Bravo offshore wind farms to a landfall in East Lothian ("the Proposed Works").

The Proposed Works are required as part of the installation of the Seagreen Alpha and Bravo offshore wind farms ("the Seagreen Project") for which marine licences were granted in October 2014. The Seagreen Project included up to six export cables to connect to a landfall at Tealing, Carnoustie. The installation of an additional export cable at an alternative landfall location was not included in the Seagreen Project that was previously assessed.

The construction of the Seagreen Project is an Environmental Impact Assessment ("EIA") project therefore the Scottish Ministers consider the Proposed Works to fall under paragraph 13 of schedule 2 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the 2017 MW Regulations") and paragraph 89, of schedule A2 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("the 2007 MW Regulations"), on the basis that they constitute an extension of schedule 2/schedule A2 works already authorised with the Proposed Works being carried out in a sensitive area as defined by the 2017 MW Regulations. Consequently, the Scottish Ministers are obliged to adopt a screening opinion as to whether the Proposed Works are or are not, an EIA project under the 2017 MW Regulations and the 2007 MW Regulations.

Under regulation 10(5) of the 2017 MW Regulations and paragraph 4(1) of schedule 2 of the 2007 MW Regulations, the Scottish Ministers have consulted with the relevant local planning authorities (Angus Council, Dundee City Council, East Lothian Council, Fife

Council and the Scottish Borders Council), NatureScot (operating name of Scottish Natural Heritage), Historic Environment Scotland ("HES") and the Scottish Environment Protection Agency ("SEPA") for their view on whether the Proposed Works are an EIA project. Copies of the consultation responses and the advice received are attached for your review (see Appendix 1). Due to circumstances outwith its control, SEPA has not been able to provide a consultation response.

When making a determination as to whether schedule 2 projects under the 2017 MW Regulations and schedule A2 projects under the 2007 MW Regulations are an EIA project, the Scottish Ministers must take into account the selection criteria set out in schedule 3 of the 2017 MW Regulations and schedule 1 of the 2007 MW Regulations as are relevant to the Proposed Works. In this regard, the Scottish Ministers have considered the following:

Characteristics of the works

The Seagreen Project was awarded Section 36 consents and marine licences for the construction and operation of 150 Wind Turbine Generators ("WTGs"), associated inter array cabling and offshore transmission asset infrastructure. The Seagreen Project will comprise of 114 WTGs to be installed on three-legged steel jackets, each installed on suction bucket caissons and 36 WTGs installed on up to four-legged steel jackets, each installed on pin pile foundations. The existing marine licences allow up to six export cables to be installed to connect the wind farm to a landfall at Carnoustie, Fife.

The Proposed Works involve the construction of an additional high voltage export cable (approximately 108 kilometres long) from the Seagreen Project to an identified landfall location on the East Lothian coastline at either Cockenzie or Seton Sands. The cable will transmit electricity from up to 36 of the 150 consented WTGs within the Seagreen Project area via an Offshore Substation Platform. The Proposed Works will follow a similar alignment to the consented Inch Cape export cable corridor and will overlap across approximately 400 to 500 meters of the Inch Cape cable route.

The cable will be buried along the majority of the export cable route and, where this is not possible, additional cable protection measures will be applied (including concrete mattresses, grout bags and/or rock placement). The exact details of the cable installation technique to be employed are yet to be confirmed; however, it is envisaged that a variety of installation and burial techniques (such as post lay burial using a jet trenching remotely operated vehicle and cable lay and burial using a cable plough or a mechanical trencher) will be used due to the variable nature of the seabed along the proposed export cable corridor. At the landfall location, a trenchless installation technique (horizontal directional drilling or direct pipe) will be used to install a cable duct from onshore to below mean high water springs.

There remains uncertainty as to the extent of the onshore works associated with the Proposed Works. East Lothian Council highlighted that further onshore transmission works including a substation within East Lothian will be required however details of this have not been provided. The screening opinion request also refers to the construction of an onshore operations and maintenance facility for the Proposed Works however does not provide any further details. The Proposed Works and onshore transmission works are integral to each other, as the electricity cannot be exported to the grid without both. The Scottish Ministers are required to consider the whole project when considering EIA.

Location of the works

The Proposed Works are to be located within the Firth of Forth and Firth of Tay running south and east of the Inch Cape Offshore Wind Farm, north of the consented Neart na Gaoithe Offshore Wind Farm and northwest of the proposed Berwick Bank and Marr Bank Offshore Wind Farms.

The Proposed Works are located within or in close proximity to the Outer Firth of Forth and St Andrews Bay Complex Special Protected Area ("SPA"), the Firth of Forth SPA, the Firth of Forth Banks Complex Nature Conservation Marine Protected Area ("ncMPA"), the Firth of Forth Site of Special Scientific Interest ("SSSI"), the Forth Islands SPA and the Isle of May Special Area of Conservation ("SAC"). NatureScot advised that there are a number of impact pathways which may lead to significant effects on one or more of these protected sites.

NatureScot advised that quantification of any habitat loss during the construction and decommissioning phases is needed to assess the impact on habitat and benthic features as well as habitats used by seabirds or migratory birds. NatureScot advised that this needs to be considered for all qualifying features of the Outer Firth of Forth and St Andrews Bay Complex SPA which overlaps with the cable corridor, as well as the Firth of Forth SPA which overlaps with the landfall locations. NatureScot also advised that the features of the Firth of Forth Banks Complex ncMPA should be assessed for any potential impact pathways.

NatureScot also advised, that disturbance and displacement effects during the construction phase are possible for all the qualifying features of the Outer Firth of Forth and St Andrews Bay Complex SPA, the Firth of Forth SPA, the Firth of Forth SSSI as well as seabird qualifying features (guillemot, kittiwake, puffin, razorbill (and seabird assemblage)) of the Forth Islands SPA. NatureScot advised that a qualitative assessment based on vessel movements and areas occupied by activity should be undertaken and that depending on the construction schedule, consideration may also be required for the Isle of May SAC designated for grey seals.

In relation to the operation and maintenance phase, NatureScot advised that it is not yet known to what extent introducing hard structures to a soft sediment environment will impact benthic and fish communities. There is the potential for impacts across multiple trophic levels due to changes in prey availability and this will need to be considered for all the qualifying features of the Outer Firth of Forth and St Andrews Bay Complex SPA and also the seabird qualifying features of the Forth Islands SPA.

East Lothian Council highlighted that construction works at the landfall locations may be in close proximity to sensitive residential receptors. These may be impacted by noise, vibration and dust caused by the Proposed Works. East Lothian Council advised that this could be controlled through the submission of a Construction Environmental Management Plan which should include practicable control measures for reducing visible dust emissions, details of daytime and night time construction noise mitigation measures and assessment of vibration impacts from tunnelling and trenching during construction. However, the Scottish Ministers note that details of these mitigation measures have not been provided so there remains a potential for significant effects on sensitive receptors.

HES advised that sufficient information has been provided to demonstrate that any potentially significant effects on historic environment interests can be effectively mitigated. The Scottish Ministers note however, that details of this mitigation have not been provided and HES have also requested sight of the Written Scheme of Investigation and Protocol for Accidental Discoveries which it requires to be submitted to show how accidental impacts on marine heritage will be avoided or mitigated and to manage any accidental discoveries of archaeological interest.

Characteristics of the potential impact

In addition to the impacts on designated sites, NatureScot also advised on the need to consider pre-construction activities such as unexploded ordnance clearance and geophysical activities that may create significant underwater noise. NatureScot confirmed that these impacts will require assessment under European Protected Species licensing as well as an assessment of the effects on designated sites with marine mammal and potentially diadromous fish qualifying features. East Lothian Council supported this view about impacts on marine mammals and referred to the Isle of May SAC and Moray Firth SAC as being potentially impacted. NatureScot also advised that greater consideration of electromagnetic field effects for diadromous fish and in particular Atlantic salmon, is required.

Concerns were raised by East Lothian Council regarding the lack of detail about the mitigation measures which have been proposed. East Lothian Council noted that this is particularly relevant for potential effects with regard to noise, accidental spillage of pollutants, invasive non-native species, possible risks to the health of the general public and fisheries. East Lothian Council also noted with respect to landscape, that the visual disturbance from the intertidal works requires further consideration as part of the Proposed Works.

The Proposed Works will overlap considerably with the Inch Cape Offshore Wind Farm export cable corridor which underwent an EIA. The screening opinion request proposes that assessments carried out in support of the Inch Cape project can be used to show that the Proposed Works will not have significant effects on the environment. However, NatureScot noted that while much can be drawn across from the previous assessments, all key environmental receptors and impact pathways have been screened out across all development phases in the screening opinion request without any project-specific quantification or justification of these impacts. NatureScot disagrees with the proposed approach due to a lack of knowledge on the Inch Cape build out and advised that insufficient consideration has been given to impacts on protected sites and features, including the potential for in-combination effects. NatureScot also advised that other works that may be sequential or operating at the same time as the Proposed Works require further consideration and may need to be assessed further.

The Scottish Ministers note the proposal in the screening opinion request to include some of this information as part of an environmental appraisal to be submitted along with the marine licence application. However, the Scottish Ministers are of the view that due to the number of uncertainties, insufficient detail on mitigation and the potential for the Proposed Works to have a significant effect on the environment, an environmental appraisal is not appropriate and the Proposed Works are an EIA project.

Conclusion

In view of the findings above, the Scottish Ministers are of the opinion that the Proposed Works are an EIA project under the 2017 MW Regulations and the 2007 MW Regulations and, therefore, an EIA is required to be carried out in respect of the Proposed Works.

If you increase, alter or extend the Proposed Works, you are advised to contact Marine Scotland - Licensing Operations Team again to confirm if the screening opinion is still valid.

A copy of the screening opinion has been forwarded to Angus Council, Dundee City Council, East Lothian Council, Fife Council and Scottish Borders Council Planning Departments, NatureScot, HES and SEPA. The screening opinion has also been made publicly available through the Marine Scotland Information website.

If you require any further assistance or advice on this matter, please do not hesitate to contact me.

Yours sincerely,

Emma Lees
Marine Scotland - Licensing Operations Team

Lees E (Emma)

From:	KellyR <KellyR@angus.gov.uk>
Sent:	23 December 2020 09:51
To:	MS Marine Renewables
Subject:	RE: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening Opinion - Response required by 08 January 2020

Dear Sir/Madam,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (As Amended)
Screening Opinion on the Proposed Marine Licence Application for the Installation of an Additional Export Cable from the Consented Seagreen Alpha And Seagreen Bravo Offshore Wind Farms, Firth Of Forth

I refer to your email consultation with accompanying attachment in connection with the above development proposal which was received by this Service on 11 December 2020.

The Screening Opinion request relates to the provision of an additional export cable from the consented Seagreen Alpha and Seagreen Bravo Offshore Wind Farms to a landfall location at Cockenzie, East Lothian.

Based on the information provided the scale, location and potential impacts arising from the installation of the additional export cable would be unlikely to have significant effects on the environment. Angus Council is therefore of the opinion that a full Environmental Impact Assessment is not required in this instance as it is considered that any potential impacts can be identified and mitigated without requiring the support of a full EIA. This view is based on the information contained in the Seagreen 1A Export Cable Corridor Screening Report however, it is the decision of your organisation to determine if a full EIA is required.

I trust the foregoing is of assistance.

Kind regards,

Ruari Kelly | Planning Officer (Development Standards) | Angus Council | 01307 492125 | kellyr@angus.gov.uk | www.angus.gov.uk

Lees E (Emma)

From: Alistair Hilton <alistair.hilton@dundeecity.gov.uk>
Sent: 23 December 2020 14:10
To: MS Marine Renewables
Subject: Re: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening Opinion - Response required by 08 January 2020
Attachments: We found suspicious links

Thank you for sending us the EIA consultation material. I can advise that we have no comment to make on this particular EIA process.

Regards,

Alistair Hilton
Principal Planning Officer
Planning Team
City Development Department
Dundee City Council
50 North Lindsay Street
Dundee
DD1 1LS

E-mail: alistair.hilton@dundeecity.gov.uk
Corporate Web Site: www.dundeecity.gov.uk

East Lothian Council

Our Ref: CONS/GOV/2020 Seagreen offshore cable
Your Ref: None given

Date: date as email

Monica Patterson
EXECUTIVE DIRECTOR
(SERVICES FOR COMMUNITIES)

John Muir House
Haddington
East Lothian
EH41 3HA
Tel 01620 827827
Fax 01620 824295

Via email to MS.MarineRenewables@gov.scot

Dear Sir/Madam,

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 (AS AMENDED)

SCREENING OPINION ON THE PROPOSED MARINE LICENCE APPLICATION FOR THE INSTALLATION OF AN ADDITIONAL EXPORT CABLE FROM THE CONSENTED SEAGREEN ALPHA AND SEAGREEN BRAVO OFFSHORE WIND FARMS, FIRTH OF FORTH.

I refer to your email of 11 December 2020 seeking our views on the above, and your further email of 5 January 2021 allowing us until 12 January 2021 to respond.

The Screening Request is for a proposal known as Seagreen 1A Export Cable Corridor. Seagreen have been granted consent under Section 36 of the Electricity Act for windfarms (Seagreen Alpha and Bravo) off the Angus coast, as well as (through separate consent under town and country planning legislation) infrastructure to connect the wind turbines to the electricity grid at Tealing. Both proposals were subject to Environmental Impact Assessment. Consent was further granted for an increase in generating capacity for the windfarms. This variation application stated that none of the physical parameters of the developments would change and that there would be no implications for the environmental effects of the project. The Decision Notice for the proposed variation to increase capacity noted that there would be no physical changes. Environmental Impact Assessment was not required.

However, it now appears that further works (the cable which is the subject of this request and further works within East Lothian) will be required to allow the all of the electricity from the proposal, that of around 36 of the wind turbines, to be exported. These works are a change to the works previously consented and would therefore appear to fall within Part 13 of Schedule 2 of the above regulations.

The wind turbines have consent. However, they are expensive to build and install and it is unlikely the developer would do so if they could not get a return on them. Under condition 5 of the original consents, any wind turbines that fail to produce electricity on a commercial basis to the National grid for a continuous period of 12 months must be removed (unless otherwise agreed). It is not clear whether or not the 36 or so turbines from which this cable will export the power would be built if the cable is not consented. It might be that the developer would install fewer turbines. However they might also install the consented number of turbines but at a lower rated capacity than is possible (say if that is cheaper for the same output).

It is therefore not certain whether the construction of the 36 or so turbines should be considered as an effect of the consenting of the cable (and other export infrastructure) or not. If the construction of the wind turbines is in fact a consequence of building this cable, then those turbines and their environmental effects might need to be considered through the screening process.

Marine Scotland should come to a view on this issue.

In order to export electricity to the national grid via this cable, further onshore transmission works including a substation within East Lothian will be required. The cable route and onshore transmission works are integral to each other, as the electricity cannot be exported to the grid without both. In addition, section 4.5 of the Screening Report notes 'This [Operations & Maintenance team] is expected to be based in purpose built onshore O & M facilties, ideally situated on the quayside at the chosen operations port location. If there is no local airport or heli-port available, this facility could also accommodate the helicopter hangar and heli-pad if required'. The onshore works within East Lothian have not been screened however the developer has stated they will submit an Environmental Statement with the application for these works. I am not aware of whether the O & M facility is intended to be in East Lothian or if it will be included in that application. You may wish to consider whether the cable works can be considered separately from the onshore works within East Lothian in terms of EIA with regard to 'salami slicing'. The Council will require to do the same on receipt of any application or Screening Request for onshore works here.

The Council has the following comments on the environmental effects of the works included in the Screening Request on interests affecting East Lothian.

Local Air Quality, Dust, Noise and Vibration.
If there are construction works at landfall locations in close proximity to sensitive residential receptors then there could be impacts upon them due to noise, vibration and dust in the construction phase that can be adequately controlled via submission of a Construction Environmental Management Plan (CEMP) to address the following:

Air Quality - no significant Impacts upon National Air Quality Objectives during the construction phase are anticipated. However with regards to dust the CEMP should include details regarding practicable control measures for reducing visible dust emissions affecting properties beyond the site boundary. Control measures to be considered are identified in Section 8 of the Institute of Air Quality Management Guidance on the assessment of dust from demolition and construction (2014).

Noise – the CEMP should refer to "Best Practice Guidance" as recommended BS5228-1: 2009 "Code of practice for noise and vibration control on construction and open sites.

Noise impacts during the construction phase shall be assessed having regard to appropriate guidance and methodology. The CEMP shall include details of any mitigation measures required to ensure the following criteria can be met:

- Daytime Construction Noise – Predicted noise levels outside living room windows of noise sensitive properties shall not exceed the 70dB trigger level specified in BS 5228-1:2009 +A1:2014 Code of Practice for noise and vibration control on construction and open sites. Part 1: Noise.

- Night Time Construction Noise – Any noisy work during the night (2300-0700 hours) shall comply with the World Health Organisation Night Noise Guidelines for Europe (2009) which recommends a limit of 40dBnight, outside.

Vibration - It is possible that sub-surface tunnelling methods at the Landfall and open trenching or horizontal drilling for the onshore and offshore export cables may give rise to vibration. Vibration impacts during the construction phase shall be assessed. Any assessment to take account of BS 5228-1:2009 +A1:2014 Code of Practice for noise and vibration control on construction and open sites. Part 2: Vibration.

Biodiversity
The Council values its biodiversity, including that of the Firth of Forth SPA, the Forth Islands SPA, and the Outer Firth of Forth and St Andrews Bay Complex proposed marine SPA. It also values the marine mammals which are visitors to the East Lothian coast, including those from the nearby Isle of May SAC and further afield Moray Firth SAC. There is legislative provision for the protection of such sites and species. If NatureScot consider impacts should be assessed through EIA the Council would support their views.

Landscape
The Screening Report notes that visual disturbance from landfall works will be included within the onshore planning application and supporting environmental information. However, the intertidal works are part of this application, and therefore should be considered. The Screening Report notes that as the project will be an underwater cable there is no pathway for impact. No permanent signage has been included in the description of the project, for example to show where the cable is buried and this response is given on the basis that this is not necessary.

Air Quality and climate change

The applicant notes that no potential pathways are identified for the SG1A project. However the Report indicates both helicopter and shipping movements, as well as the use of materials (including concrete) that could cause emissions which could effect the climate and air quality. One of the main benefits of the project as a whole (the offshore wind turbines) is to reduce climate change emissions. Moving away from coal generation also improves air quality. The purpose of this change to the project is to enable 36 wind turbines to export electricity to the national grid. Whether or not the turbines as structures are considered part of the project, the savings of emissions to air including carbon dioxide resulting from export of additional renewable energy is attributable to the existence of the cable and other export infrastructure. Good practice advice from the IEMA advice on climate change mitigation (see https://transform.iema.net/article/eia-and-search-significance) notes that "Greenhouse gas emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any GHG emissions or reductions from a project might be considered to be significant."

The project therefore has both positive and negative impacts on climate. You may consider this is a significant effect in terms of EIA for the cable.

Fishing
Fish as a harvestable food resource and fishing boats/gear can be considered material asset in terms of EIA. It is not clear from the information provided what the impact will be on fishing within East Lothian, though some boats do operate from here. The Scoping Report notes there are some potential pathways to commercial fishery receptors. This is proposed to be the subject of consultation with commercial fisheries stakeholders. Some impacts will also be considered in an Environmental Appraisal, namely temporary loss or restricted access to fishing grounds; displacement of fishing activity into other areas and safety issues for fishing vessels. Interference

with fishing activity, increased steaming times and impacts to commercially exploited species will not be assessed.

Safety issues are potentially a significant issue however safety zones and other mitigation will be in place.

Mitigation
The Council is concerned to avoid impacts on its area including from accidental spillages of pollutants, as well as nuisance from dust and noise noted above, the introduction of invasive non-native species, and on fishing interests. Potential impacts have been noted, with mitigation measures outlined.

The applicant states on page 31 that "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." Where this mitigation is relied on to avert the need for EIA, the mitigation should be fully specified and evaluated at this stage to ensure there is confidence in its effectiveness. This is also the case for mitigation described for commercial fisheries. There is also the need for clear control measures to make sure that the mitigation is successfully implemented to avoid, reduce or offset the environmental impact. This is relevant for potential effects in East Lothian with regard to noise, accidental spillage of pollutants, invasive non-native species and possible risks to the health of the general public controlled through COSHH Regulations, and fisheries. If there is doubt that the mitigation described will be effective in avoiding a significant impact, EIA should be carried out.

If you would like to discuss the contents of this letter further, please contact J Squires via email or Skype at jsquires@eastlothian.gov.uk

Yours sincerely,

[Redacted]

Keith Dingwall
Planning Service Manager

Lees E (Emma)

From: Martin Mcgroarty <Martin.McGroarty@fife.gov.uk>
Sent: 28 December 2020 15:58
To: MS Marine Renewables
Subject: 20/03136/CON Seagreen A&B OWFs - Screening Opinion for additional export cable

FAO Emma Lees

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 (AS AMENDED)

SCREENING OPINION ON THE PROPOSED MARINE LICENCE APPLICATION FOR THE INSTALLATION OF AN ADDITIONAL EXPORT CABLE FROM THE CONSENTED SEAGREEN ALPHA AND SEAGREEN BRAVO OFFSHORE WIND FARMS, FIRTH OF FORTH.

Fife Council has not provided a formal opinion on the basis that this request relates to an area outwith our geographical jurisdiction.

We consider, however, that an additional cable in the same channel as the existing consented works would not significantly impact further on the environment than has already been assessed through the environmental assessments carried out to date.

Kind regards,
Martin

Martin McGroarty
Lead Professional (Minerals)
Development Management
Planning Services
Fife Council
Fife House
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LISTEN | CONSIDER | RESPOND

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to:
MS.MarineRenewables@gov.scot

Marine Scotland (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300047965

06 January 2021

Dear Marine Scotland,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Proposed Marine Licence Application
Request for Screening Opinion for the installation of an additional export cable from the consented Seagreen Alpha and Seagreen Bravo Offshore Wind Farms, Firth of Forth

Thank you for your consultation which we received on 14 December 2020 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

Your archaeological and conservation advisors will also be able to offer advice for their interests. This may include unscheduled archaeology, category B- and C-listed buildings and conservation areas.

Our Screening opinion

At this point, we are content that sufficient information has been provided in the screening report to demonstrate that any potentially significant effects on our interests are likely to be capable of mitigation. We will look forward to receiving an Environmental Appraisal to be produced in support of the Marine License application to clarify certain elements in terms of Marine Archaeology.

Our advice

The Seagreen 1A project is proposing to create an additional export cable corridor (approximately 108km) from the consented Seagreen Project Area to an identified landfall location at Cockenzie.

We welcome that an Environmental Appraisal to be produced in support of the Marine License application will consider in further detail the impact on the seabed disturbance

resulting in loss or damage to shipwrecks, aircraft or anthropogenic geophysical anomalies.

We also welcome that the Seagreen 1A Project will prepare a marine heritage Written Scheme of Investigation and Protocol for Accidental Discoveries to avoid or mitigate accidental impacts and manage any accidental discoveries of archaeological interest.

We would be happy to review this prior to it being submitted.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Chloe Porter and they can be contacted by phone on 0131 668 8653 or by email on chloe.porter@hes.scot.

Yours faithfully

Historic Environment Scotland

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Emma Lees
Marine Scotland – Licensing Operations Team
Marine Laboratory
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

15 December 2020

Our ref: CNS REN OSWF SG – Seagreen Offshore Wind Post-application

Dear Emma

SEAGREEN 1A ADDITIONAL EXPORT CABLE

NATUTESCOT ADVICE ON REQUEST FOR SCREENING OPINION

Thank you for requesting our advice on the request for a screening opinion submitted by Seagreen Wind Energy Ltd for the addition of a single export cable (hereafter referred to as the SG1A project) from the consented Seagreen 1 offshore wind farm (formally called Alpha and Bravo) to landfall on the East Lothian coastline as detailed in Figure 1.1.

We have reviewed the Screening Report provided (document reference LF000012-CST-OF-LIC-DEV-REP-0001) and note that the cable route largely follows the route of the consented Inch Cape cable corridor route from Cockenzie out to the Inch Cape wind farm array area before tracking north east to the Seagreen 1 wind farm array area. The final landfall location (and export cable route) are yet to be determined with two potential landfall options identified - Cockenzie or Seton Sands. HDD or direct pipe is being considered for the Cockenzie landfall location (section 4.4) however no further information is provided in relation to Seaton Sands.

The Inch Cape export cable corridor was originally assessed in 2011 and revalidated in 2018 for the revised project design. However, Inch Cape have yet to reach financial closure (FID) and as such there are still many project elements that could still be refined including whether or not all 6 consented cables will be required. We welcome ongoing discussion to see how these projects may align.

EIA requirements

We are content that the SG1A project does not require a full EIA, as we acknowledge that much can be drawn across from the previous assessments, however, these cannot be relied upon exclusively. We support the need for a bespoke environmental appraisal to accompany the forthcoming Marine Licence application for the SG1A project and commend the commissioning of additional benthic surveys to validate and augment the existing baseline given the length of the intervening time period since original baseline characterisation.

With regard to the approach taken within the screening report - all of the key environmental receptors and impact pathways have been screened out across all development phases without any project-specific quantification or justification of these impacts, instead reference is made to these impacts as *previously been assessed as not significant in the Inch Cape or Seagreen ES.* We do not agree with this approach for the reasons stated above regarding lack of knowledge on the Inch Cape build out. We also advise insufficient consideration has been given to impacts to protected sites / features, despite the overlap with the SG1A project area, including the potential for in-combination effects.

Environmental Appraisal in support of the Marine Licence application

Going forward we advise that the accompanying Environmental Appraisal should concentrate on those site/features which lie adjacent to or overlap with the SG1A project area, noting that the project is likely to be completed within a year and will utilise up to two primary construction vessels with smaller support vessels for landfall works.

Pre-construction phase impact pathways

We advise on the need to consider pre-construction activities that can emit significant underwater noise e.g. UXO clearance and some geophysical activities. Impacts will require both assessment under EPS licensing as well as effects to designated sites with marine mammal and potential diadromous fish (Atlantic salmon) features. These impacts should be considered within the EA rather than post-consent.

Construction phase impacts

- Direct habitat loss / disturbance

Despite the temporary nature of this impact pathway during construction, quantification of any habitat loss should be provided to assess the impact on habitat/benthic features as well as habitats used by seabirds or migratory birds. We advise therefore that the Outer Firth of Forth and St Andrews Bay Complex SPA which overlaps with the cable corridor as well as the Firth of Forth SPA which overlaps with the landfall locations are screened in for all features so that this can be considered further. We also advise that the features of Firth of Forth Banks Complex Nature Conservation MPA will need to be assessed for any potential impact pathways.

- Disturbance and or displacement

Disturbance / displacement effects during construction should be considered for all the qualifying features for Outer Firth of Forth and St Andrews Bay Complex SPA, the Firth of Forth SPA (& SSSI)

as well as seabird qualifying features (e.g. guillemot, kittiwake, puffin, razorbill (and seabird assemblage)) of Forth Islands SPA. A qualitative assessment based on vessel movements and areas occupied by activity should be undertaken. Depending on the construction schedule consideration maybe required for the Isle of May SAC designated for grey seals.

Operation & maintenance phase

- Changes to prey availability

We don't yet know the extent to which introducing hard structures (e.g. cable protection) to soft sediment environment will have on benthic and fish communities and the inter play across trophic levels. This impact should be considered for all the qualifying features for Outer Firth of Forth and St Andrews Bay Complex SPA and the seabird qualifying features of the Forth Islands SPA.

- EMF / barrier effects

Greater consideration of EMF effects for diadromous fish particular Atlantic salmon is required. It is likely that key current research projects being undertaken by Marine Scotland Science will have reported or will have results that can be utilised in the assessment and mitigation of this project.

Decommissioning phase impact pathways

Our advice above for construction phase impacts should also be considered for decommissioning phase activities.

Cumulative / In-combination impacts

The approach taken for consideration of cumulative impacts or in-combination effects mirrors that described above where the conclusions from the previous Inch Cape and or Seagreen ESs have been utilised without any project-specific quantification or justification. It would be helpful to revisit this and consider what other works may be sequential or operating at the same time that may need to be assessed further.

Further information and advice

We are happy to discuss further any aspect of our advice. Please contact myself, Karen Taylor or Erica Knott in the first instance for any further advice.

Yours sincerely,

Karen Taylor

Marine Sustainability Adviser

karen.taylor@nature.scot Mobile: [redacted]

Lees E (Emma)

From: Miller, Craig <CMiller@scotborders.gov.uk>
Sent: 15 December 2020 10:48
To: MS Marine Renewables
Subject: FW: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening Opinion - Response required by 08 January 2020
Attachments: Screening Report.pdf

Emma

Due to the remote location of this installation from the Scottish Borders, we have no comments to make on this Screening Request but thank you for consulting us,

Regards

Craig

Craig Miller
Principal Planning Officer
Regulatory Services
Scottish Borders Council
Tel: 01835 825029
E-mail : cmiller@scotborders.gov.uk

Web | Twitter | Facebook | Flickr | YouTube

How are you playing #yourpart to help us keep the Borders thriving?

Seagreen Offshore Wind Farm
Offshore Electricity Transmission Infrastructure
PRE-APPLICATION PUBLIC CONSULTATION

Proposal: Marine Licence application for the construction, operation and decommissioning of the Seagreen 1A offshore export cable to transport electricity from the Seagreen Offshore Wind Farm to landfall at Cockenzie, East Lothian

The Seagreen Offshore Wind Farm in the outer Firth of Forth and Firth of Tay was awarded consent from Scottish Ministers for 150 wind turbines and associated project infrastructure in 2014.

To maximise energy generation and facilitate full export capacity for the Seagreen Project, Seagreen 1A Limited (S1AL) intends to seek a Marine Licence for an additional export cable corridor (approximately 108km) from the consented Seagreen Project Area, to an identified landfall location. This infrastructure comprises the Seagreen 1A Project. National Grid, the national electricity transmission network operator, provided a 360 MW connection offer for the Cockenzie substation in East Lothian. This was accepted by Seagreen in May 2020.

The offshore transmission infrastructure for the Seagreen 1A Project consists of one high voltage export cable to mean high water springs (MHWS), cable landfall and connection to the onshore infrastructure.

A separate planning application will be submitted to East Lothian Council for the onshore electricity transmission infrastructure.

A virtual public exhibition on the proposals will be available online from Monday 11th January 2021 to Monday 1st February 2021 on the project website at www.seagreen1A.com

The virtual public exhibition will include a link to a feedback form where comments and questions on the proposal, as well as any requests for further information, can be submitted directly to the Project Team. Alternatively, you may do so by emailing Seagreen1A@sse.com or by calling [redacted]

A live question and answer session on the proposals will take place between 12:00 – 14.30 hrs and 18.00 – 20.30 hrs on Monday 18th January 2021 via a live chat function in the virtual public exhibition.

If you have any questions or comments on the proposals, we request that these be submitted via the feedback form by 5pm on Monday 1st February 2021. Alternatively, you may do so be emailing or calling the Project Team at the above contact details.

Please note that this notice does not relate to a Marine Licence (consent) application and that any comments made on the proposals to S1AL at this stage are not representations to Scottish Ministers. If a consent application is subsequently submitted to Marine Scotland, there will be an opportunity then for representations to be made to the Scottish Ministers on the application.