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APPLICATION FOR MARINE LICENCES FOR THE INSTALLATION OF THE PROPOSED EASTERN GREEN LINK 2 (EGL2) MARINE SCHEME, UNDER THE PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009

Further to our recent engagement meeting in April 2022 and our pre-application briefing on the 17th May 2022, please accept this letter and the enclosed application for Marine Licences under Part 4 of the Marine (Scotland) Act 2010 (for activities within Scottish territorial waters) and Part 4 of the Marine and Coastal Access Act 2009 (for activities within Scottish offshore waters). This application is submitted by Scottish Hydro Electric Transmission plc (SHE Transmission), the transmission network licence holder for northern Scotland.

The Eastern Green Link 2 Project is being jointly developed by SHE Transmission and National Grid Electricity Transmission (NGET) and will unlock the rich renewable energy capacity of Scotland. The Project will reinforce electrical transmission infrastructure facilitating increased renewable electricity generation and transmission between Scotland and England. It will also support our drive toward our Net Zero targets in Scotland and across the rest of the UK. The Marine Scheme associated with the Project runs from Peterhead in Aberdeenshire, Scotland to Fraisthorpe Sands on the East Riding of Yorkshire coast, England.

This application is for the Scottish components of the Marine Scheme, which is part of a wider Project comprising the following components:

- **Scottish Onshore Scheme:** From the existing transmission system and an adjacent substation approximately 1 km of buried high voltage alternating current (HVAC) cable will connect to a proposed converter station. A further approximately 1 km of buried high voltage direct current (HVDC) cable will extend from the proposed converter station to the landfall at Sandford Bay, Peterhead. The scope of the Scottish Onshore Scheme ends at MLWS, and is covered by a separate consent application which was submitted in November 2021 to Aberdeenshire Council and permission granted in May 2022 (APP/2021/2681);
- **Marine Scheme:** Commencing at MHWS within Sandford Bay, approximately 436 km of submarine HVDC cable, comprising 150 km in Scottish waters and 286, km in English waters, will extend to MHWS at Fraisthorpe Sands on the East Riding of Yorkshire coast. The elements of the Marine Scheme in Scottish Territorial and Offshore waters comprise the subject of the Marine Licence application to MS-LOT, an accompanying application is being submitted to the Marine Management Organisation to the elements of the Marine Scheme in English waters; and
- **English Onshore Scheme:** From MLWS at Fraisthorpe Sands, approximately 67 km of underground buried HVDC will connect to a proposed converter station in Drax within the Selby District. The proposed converter station will then connect to an existing substation within the boundary of the Drax Power Station by approximately 100 m of HVAC cable. This is subject to a separate consent application which was submitted to East Riding of Yorkshire Council (Planning Portal Ref: PP-11285186v1BZD) and Selby District Council (Planning Portal Ref: PP-11291708v1GQS) in May 2022.

The Marine Scheme comprises of two HVDC single core metallic conductors, a Fibre Optic (FO) cable and associated cable protection measures. The entirety of the HVDC cable system for which marine consent is sought will be installed within a 500 m wide installation corridor, referred to in the supporting Environmental Appraisal Report (EAR) as the 'Marine Installation Corridor'.

Two Marine Licences are required for the Marine Scheme in Scottish waters:

- One under the Marine (Scotland) Act 2010 for all activities associated with the installation, installation of the cable protection, removal of materials and other supporting and maintenance works within Scottish territorial waters (within 12 NM); and
- One under the Marine and Coastal Access Act 2009 for the installation of cable protection only within Scottish offshore waters beyond 12 NM. Under Section 81(2)(b) of the Marine and Coastal Access Act 2009, works undertaken in the course of laying or maintaining a submarine cable are exempt from a Marine Licence, although licence conditions may still be applied.

At the Scottish landfall, the cable system will be installed beneath the intertidal zone and shallow subtidal area using Horizontal Directional Drilling (HDD).

An EAR is provided in support of this application. Further to discussions during our pre-submission briefing, the EAR comprises three volumes:

- **Volume 1 – Non-Technical Summary**. This is readily accessible to the general public. It is concise and written in non-technical language providing a description of the Project, in particular the Marine Scheme, and a summary of the assessment of likely significant environmental effects and proposed mitigation measures;
- **Volume 2 – Main Report**. This comprises the main text including a description of the Marine Scheme (including the alternatives considered), the baseline conditions, and appraisal of the likely significant environmental effects resulting from the Marine Scheme, and proposed measures to mitigate those effects; and
- **Volume 3 – Technical Appendices**. This comprises supporting technical information which is cross referenced throughout Volume 2.

The following table details the content of Volumes 2 and 3 of the EAR:

Chapter	Title	Description
Volume 2 Main Report		
01	Introduction	A general introduction to the Marine Scheme, providing a project overview and an explanation of the need for the project.
02	Project Description	A description of the activities associated with the Marine Scheme at the installation, operation and decommissioning phases.
03	Legislative and Policy Framework	A description of key relevant legislation and policy (including Marine Planning) that is considered to apply to the construction, operation and decommissioning of the Marine Scheme.
04	Approach to Environmental Appraisal	A description of the methodology used to undertake an appraisal of potential environmental effects associated with the Marine Scheme.
05	Alternatives and Design Development	A description of the evolution of the design of the Marine Scheme and the alternatives considered.
06	Consultation and Stakeholder Engagement	An overview of the consultation activities and stakeholder engagement carried out as part of the environmental appraisal process for the Marine Scheme.

Chapter	Title	Description
07	Physical Environment	An appraisal of the potential interaction of the Marine Scheme with the physical environment.
08	Benthic Ecology	An appraisal of the potential interaction of the Marine Scheme with intertidal and subtidal benthic ecology.
09	Fish and Shellfish Ecology	An appraisal of the potential interaction of the Marine Scheme with fish and shellfish ecology.
10	Marine Mammals	An appraisal of the potential interaction between the Marine Scheme and marine mammals.
11	Ornithology	An appraisal of the potential interaction of the Marine Scheme and ornithology.
12	Marine Archaeology	An appraisal of the potential interaction of the Marine Scheme and marine archaeology.
13	Shipping and Navigation (including Navigational Risk Assessment)	An appraisal of the potential interaction of the Marine Scheme with shipping and navigation. It constitutes a full Navigational Risk Assessment (NRA), adopting appropriate NRA methodology and language in line with relevant guidance.
14	Commercial Fisheries	An appraisal of the potential interaction of the Marine Scheme and commercial fisheries.
15	Other Sea Users	An appraisal of the potential interaction of the Marine Scheme and other sea users.
16	Cumulative and In-Combination Effects	An appraisal of the potential interaction of the Marine Scheme and other plans / projects.
17	Schedule of Mitigation Commitments	A table to summarise the embedded and project specific mitigation.
18	Summary and Conclusions	A summary of the outcome of the aforementioned appraisals.
Volume 3 Technical Appendices		
2.1	Eastern Link EMF and Compass Deviation Assessment	An assessment by NGET of the electromagnetic fields and associated compass deviations which may result from the operation of the subsea cables.
3.1	Marine Plan Compliance Checklist	A checklist of the relevant marine plan policies to signpost where and how they have been considered in the EAR and to demonstrate compliance.
3.2	Topic Specific Legislation	A summary of the specific international, national and local legislation and agreements listed in each technical chapter in volume 2 relating to the development of offshore cables.
6.1	Scoping Responses	A summary of the consultation responses received during the non-statutory scoping exercise and response from the Project to these.
6.2	Report on Baseline Consultation with Fisheries Stakeholders	A summary of the baseline consultation undertaken with fisheries stakeholders by Brown & May Marine Ltd.
7.1	Water Framework Directive (WFD) Report	Identifies the relevant WFD groundwater and surface waterbodies located in proximity of the Marine Scheme and assesses the WFD features identified which could potentially be impacted.
8.1	Habitat Alignment Charts	Outputs from the site specific benthic surveys undertaken along the Marine Installation Corridor showing the different habitats and features of interest.
8.2	Habitat Regulations Assessment Report	A report to inform the HRA assessment process in determining whether the Marine Scheme is capable of adversely affecting European sites.
8.3	Marine Protected Area and Marine Conservation Zone Report	A report to inform the MPA / MCZ assessment process in determining whether the Marine Scheme is capable of significantly affecting protected features of an MPA / MCZ; and / or any ecological or geomorphological process on which the conservation of any protected features of an MPA / MCZ is (wholly or in part) dependent.
12.1	Marine Archaeology Technical Report	Comprises a marine archaeological baseline study of the Marine Scheme, based on an archaeological assessment of geophysical and geotechnical data, gathered as part of the Project surveys, together with a review of records held by national and local inventories and secondary sources relating to the marine and intertidal historic environment of the region.

Chapter	Title	Description
13.1	Summary and Hazard Log	A record of the Hazards to Shipping and Navigation identified as part of a standard Formal Safety Assessment and to facilitate tracking of the implementation of the identified risk reduction measures associated with the identified hazards

The following documents are proposed to be submitted post-consent to discharge an appropriately worded licence conditions. These plans will be included within the Construction Environmental Management Plan, which will be prepared by the Contractor, following their appointments.

- **Emergency Spill Response Plan:** This plan will assess the risk of spills and provide a step guide which is to be followed in the event of a spill during the Installation Phase of the Marine Scheme;
- **Waste Management Plan:** This plan will outline how waste created by the Marine Scheme will be managed and dealt with, taking into consideration the waste hierarchy, including estimates of waste types, volumes and management methods;
- **Marine Mammal Protection Plan:** This plan focusses on the potential impacts to marine mammals associated with the Marine Scheme, incorporating management actions and strategies associated with Installation Phase activities;
- **Fisheries Liaison and Co-existence Plan:** This plan will document communication commitments to co-existing with the commercial fishing industry in the areas of the Marine Scheme during Installation; and
- **Marine Non-native Species Plan:** This plan will provide an overview of the roles and responsibilities in regard to marine non-natives and details the requirements for risk assessments and management of marine non-natives including mitigation measures.

Additionally, a Cable Burial and Protection Plan will be provided post-consent which will include detailed micro-routeing, trenching methods and external protection methods for the final design of the Marine Scheme prior to commencement of Installation Phase activities and following appointment of the Contractor. This will be informed by detailed engineering but will not exceed the design envelope as described in Chapter 2: Project Description and appraised by the EAR submitted in support of the Marine Licence applications.

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

Jon Ashburner and Peter Watson

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SHE Transmission
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