

T: +44 (0)300 244 5046

E: [MD.MarineLicensing@gov.scot](mailto:MD.MarineLicensing@gov.scot)

## THE WILDLIFE AND COUNTRYSIDE ACT 1981

### Application for a Basking shark (*Cetorhinus maximus*) licence for one of the following purposes

- Preserving public health or public safety
- Preventing the spread of disease
- Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries.
- Social, economic or environmental purpose

Important: Before completing this form, please read these notes carefully

**Please complete all relevant sections of the form.**

Please ensure that you answer questions fully in order to avoid delays.

The completed application should be sent to Marine Directorate Licensing Operations Team (MD-LOT) at the address below or emailed to [MD.MarineLicensing@gov.scot](mailto:MD.MarineLicensing@gov.scot).

We will not process unsigned application forms.

Please ensure that you supply any necessary supporting information e.g. detailed method statements, risk assessments etc.

MD-LOT will aim to determine whether a licence should be issued within 6 to 8 weeks of acceptance of a completed application.

If you experience any problems filling in this form, please contact MD-LOT.

Please use this application form if you wish to undertake works/activities that would affect Basking sharks in the inshore marine area (0 – 12 nautical miles).

Do not use this form if your application relates to scientific, research, conservation or educational purposes. Please contact NatureScot, email [licensing@nature.scot](mailto:licensing@nature.scot), Telephone 01463 725364 or visit the [NatureScot website](#) for a licence application for these purposes.

Before a licence can be granted, it is essential that other relevant licences or consents have been secured for the proposed activity (eg Marine licence).

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

**Part A**

**Section 1 Personal details**

Please provide details of the individual, company or partnership you wish to be named on the licence. The licensee is responsible for ensuring compliance with the licence and its conditions. Failure to carry out the work proposed in accordance with the terms of the licence may expose the licensee to criminal liability.

**Section 2 Previous applications**

Please provide details of any previous relevant licences.

**Part B**

**Section 3**

**Location**

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.

#### **Section 4 Consideration of designated sites**

Please provide details of any designated sites affected by your proposals. You are advised to consult Scottish Natural Heritage, or other appropriate regulator, if the work you propose to do affects a European site, an MPA or a Site of Special Scientific Interest.

#### **Section 5 Activities to be licensed**

Please indicate the activities you intend to undertake that would otherwise be unlawful. Provide details of the proposed commencement and completion dates of the activities. The licence start date will not be backdated, since to commence a project for which a licence has not been obtained may constitute an offence resulting in appropriate legal action.

It is the licensee's responsibility to apply for any further licences or an extension prior to the expiry of the initial licence.

#### **Section 6 Purpose of the licence application**

Please indicate the purpose of the licence application as described in the Wildlife and Countryside Act 1981, Part 1, Section 16 (3).

#### **Section 7 Satisfactory alternatives**

Please provide your consideration of why there is no satisfactory alternative. This must include the other options that have been evaluated, the alternative sites that were considered by you and why they were rejected (if no other sites were considered, you must provide the reasons why), or alternative methods of carrying out the work and alternative dates / timings. The 'do nothing' alternative must also be considered.

In relation to each alternative considered, please provide an explanation of why you consider it to be satisfactory or unsatisfactory. In respect of any alternative sites please provide the location(s) and details of the alternative site(s), or your views on how the activity/proposal might have been achieved differently, and any other helpful information; e.g., pros and cons of alternative sites, or whether there is likely to be demand for all suitable sites to be used to meet an identified need. Please explain how this conclusion was reached.

#### **Section 8 Summary of the planning / licensing position**

Detail all consents and licences required for the proposed project and indicate those that you have applied for or received.

#### **Section 9 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. This includes use of seismic airguns, other geophysical surveys (<10kHz), pile driving, explosives and certain acoustic deterrent devices. This monitoring requires completion of a form at the application stage (giving details of the proposed work) as well as completion of a 'close-out' form (giving details of the actual dates and locations where the activities occurred). The close-out form should be returned within 12 weeks of completing 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 are available on the [Marine Noise Registry website](#).

## Section 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, the Marine Directorate has 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 on the [Scottish Government website](#).

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 Policy13 (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.

## Section 11 Privacy notice

This section briefly describes the Scottish Ministers' responsibilities in relation to Data Protection based on the requirements the data protection laws and the Environmental Information (Scotland) Regulations 2004 and the Freedom of Information (Scotland) Act 2002.

### Part D

## Section 12 Declaration and warning

It is important to read the Declaration and Warning sections before signing the application form.

### Site visits and compliance checks

It is possible that the licensing authority may undertake a site visit prior to the issue of a licence. The majority of site visits will be arranged several days in advance and will be conducted in the presence of the licensee (or applicant) however there may be occasions when a site visit will be made at short notice.

Licensees should be aware that they may receive a request for a site visit by the licensing authority, or a person authorised by the licensing authority, to assess site conditions against the conditions of the licence. It is essential that if any of the agreed mitigation measures contained in the method statement are changed for any reason, the licensing authority is informed as soon as possible.

The Licensing authority will monitor compliance with licences issued based on the information included in licence returns.

### Where to seek further information

Further information can be obtained from Licensing Operations Team at the address below.

Marine Directorate - Licensing Operations Team  
Scottish Government  
375 Victoria Road  
Aberdeen  
AB11 9 DB

Tel: 0300 244 5046  
Email: [MD.MarineLicensing@gov.scot](mailto:MD.MarineLicensing@gov.scot)

While every effort has been made to ensure the information contained in this document is accurate, nothing in this document should be taken to replace the current legislation in force at this time. You are advised to obtain qualified legal advice in relation to your rights and responsibilities under the 1981 Act and other legislation.

**Part A. The Applicant: Personal details**

These questions relate to the person who will be the named licensee. The licence can be issued to an individual or a company or a partnership and the licensee will be responsible for ensuring compliance with the licence and the conditions of the licence. Under the The Wildlife and Countryside Act 1981 failure to carry out the work which you propose in accordance with the terms of the licence may expose you to criminal liability.

1. Name of applicant

Title: [Redacted] Forename(s): [Redacted] Surname: [Redacted]

Company Name: Nexans Norway AS

Business Title (if Appropriate): Nexans Project Manager. (SSEN Project Title/Number:LT000017 - Orkney Caithness 220kV Link)

Address: Freserveien 1, 0196 Oslo  
http://nexans.no/  
+47 22886100

Tel no. (incl dialling code): +47 950 34 901

Email address: [Redacted]

**2. The Applicant: Previous applications:**

Have you previously held a wildlife licence issued in the UK? (please tick as appropriate)

Yes  No  (If yes, please complete below, if no, please go to Part B)

Who issued the licence? MD-LOT

Licence number (most recent licence) BS-00011441

Year in which the licence was issued. 2025

What species were covered by the licence? Basking Sharks

What activity was covered by the licence e.g. disturb, injure? Disturb

**Part B. The Application**

**3 Species**

(a) How many individuals will be affected by licensed work? This must be the maximum number of animals that could be affected prior to any mitigation measures being applied.

A maximum of two basking shark individuals. This represents a precautionary worst-case estimate of the maximum number of individuals that could potentially be exposed to disturbance prior to the application of mitigation, based on the low density of basking shark in the area and the localised, temporary nature of the proposed activities

(b) Please provide a description of how this number was calculated / estimated

There is no defined reference population for basking shark within waters around Orkney. As set out in the supporting European Protected Species Risk Assessment, basking shark occurrence in the wider area is characterised by very low densities and infrequent sightings.  
 Observed adjusted densities of basking shark across all seasons (2000–2012) indicate densities ranging from approximately 0.0 to 0.10 individuals per 5 km<sup>2</sup>. In the absence of population-level data, and applying a precautionary approach, a conservative worst-case estimate has been adopted.  
 Taking into account the low baseline density of basking shark in the area, the localised and temporary nature of the proposed survey and concrete mattress installation activities, and the limited spatial footprint of individual operations, it is estimated that a maximum of two individuals could potentially be exposed to disturbance prior to the application of mitigation measures. This estimate is considered highly precautionary and is consistent with the conclusions of the EPS Risk Assessment.

(c) **Location of proposed licensed action**

Latitude and Longitude co-ordinates (WGS84) defining the extent of the project. Please continue on a separate sheet if necessary.

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

- (d) Provide a brief description of the proposed activity and the methods to be used.  
Detailed information should be included in your supporting information  
Please provide details of the source levels and frequencies of underwater noise if relevant

Nexans are planning to undertake a General Visual Inspection (GVI) survey and associated localised concrete mattress installation works in connection with the installation of a 220 kV Alternating Current (AC) cable system between Orkney and Dounreay on the Scottish Mainland (HVAC Cable – Orkney to Mainland Scotland MS-00010803). The GVI survey works will use at least a Work-class ROV to visually inspect and document the seabed as well as the use of USBL positioning systems. An optional scope of surveys is also being considered including crossing survey and nearshore photogrammetry survey of the Warebeth landfall. Temporary, non-impulsive underwater noise will also arise from vessel operations, ROV thrusters and lifting activities associated with concrete mattress installation; these sources are of lower magnitude than the survey acoustic systems and are assessed in the supporting EPS Risk Assessment.

The equipment of potential impact to marine EPS and associated sound sources is as follows (please see Table 3.2 of the attached Orkney Mainland HVAC 220 kV Subsea Link EPS Risk Assessment report for detailed equipment specifications).

- MBES - 200-400 or 700/200-400/10.5-13.5/ 260/ 720 or 1200 kHz and 200-700; SPL of between 191 and 230 (rms) and 221 and 240 (peak) dB re 1µPa rms at 1 m
- USBL - 21.5-30.5/21-31/30-60/20-34 kHz; SPL of between 175 and 190 (rms) and 184 and 202 (peak) dB re 1µPa at 1 m
- DVL - 1000 kHz; SPL above 190 (rms) dB re 1µPa rms at 1 m and 70-120 kHz; SPL of 210 (rms) and 225 (peak) dB re 1µPa rms at 1 m.; 200-500 kHz with an estimated noise between 190 and 200 dB re 1µPa rms at 1 m and 400 or 600 kHz with an estimated noise of 217 B re 1µPa rms at 1 m
- SVP - 200-700 kHz; with an estimated SPL of 190 dB re 1µPa rms at 1 m
- ADCP - 400, 600 or 1000 with an estimate SPL between 213 and 220 B re 1µPa rms at 1 m

- (e) Briefly state how you will minimise the impact of your proposed work on Basking shark.  
Detailed information should be included in your supporting information.

- Adherence to best practice measures outlined in JNCC guidelines (2017) and the Marine Directorate (in conjunction with NatureScot) July 2020 guidelines for Scottish inshore waters.
- Pre-work searches carried out by an MMO/PAM operator.
- Recommended mitigation zone of 500 m.
- Additional pre-work mammal watches required if a significant break in operations were to occur with deactivation of USBL system for more than 10 minutes. In this case, a 30 minute pre-watch would be carried out before restarting work.
- Soft-start for all acoustic equipment used during survey and installation activities - over 20 minutes to full necessary output - where possible.
- An observer will be present on the bridge of the survey or installation vessel, undertaking a watch during transit from the port to the survey and installation corridor. In the case of an observation, the Vessel Master will ensure all marine mammals are avoided to a distance of at least 100 m, and will minimise the use of high powered vessel manoeuvres (where safety is not impaired).
- A log of all MMO effort and geophysical survey systems and positioning equipment operations will be kept.
- Following completion of the survey programme, Nexans will submit a report to MD-LOT.
- The Marine Noise Registry close-out report (<https://mnr.jncc.gov.uk/>) will also be completed.

#### 4. Consideration of designated sites

Designated Areas: National Nature Reserves (NNR), Sites of Specific Scientific Interest (SSSI), Special Protection Area (SPA), Special Areas of Conservation (SAC), Ramsar sites, Marine Protected Areas (MPA). Information on designated sites is available on [NatureScot's website](#).

- (a) Will any part of the proposed activity fall within /or adjacent to an area covered by a designated site eg SSSI, SAC, MPA?

Yes  No

- (b) Please give the name of the designated site(s) and either the outcome of your consultations or the reason why you have not consulted. Please enclose any relevant correspondence.

No European site directly overlaps the cable corridor; the Stromness Heaths and Coast SAC is located approximately 2.07 km away from the cable corridor. Other relevant SACs were identified based on an overlap with the 25 km general screening boundary, or by having highly mobile features as a primary reason for site selection. Table 6-1 and 6-2 within the Orkney Mainland HVAC 220 kV Subsea Link HRA Screening and Report to Inform Appropriate Assessment (RIAA) lists all protected sites considered for potential impacts.

No consultation has been undertaken as the survey and mattress installation activities are predicted to be unlikely to injure any EPS and may disturb a small percentage of the reference EPS population, however the proposed mitigations will reduce the disturbance risk.

The potential survey area overlaps with North Caithness Cliffs SPA and Hoy SPA/SSSI and is adjacent to the Scapa Flow SPA. While these are not EPS, the survey activities may cause some disturbance and/or displacement of bird species due to the physical presence of the survey and installation vessel and equipment. However, the mitigation measures proposed for marine mammals will reduce this risk, as will the short duration of activities and predefined routes making vessel movements predictable.

**5. Activities to be Licenced**

**Proposed Methods**

(a) Please complete all relevant columns in the table below to indicate the methods you propose to use, the activity involved and the time period in which you propose to use each method. This information will be used when preparing the licence to cover activities that would otherwise be unlawful, and failure to give full details may result in an inappropriate licence being issued.

Disturb	Kill	Take / trap	Damage or destroy place of shelter / protection	Method	From	To
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation of acoustic survey and positioning equipment (	01/03/2026	30/09/2026
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

**6. Purposes of the licence application (tick one box only)**

Please indicate which purpose relates to the proposed works. The options shown are taken from The Wildlife and Contryside Act 1981.

(a) Preserving public health or public safety (we will require evidence that there is a risk to public health or public safety e.g. an imminent risk of flooding) (Section 16 (3) (f))

Complete Annex A

(b) Preventing the spread of disease (Section 16 (3) (g))

Complete Annex B

(c) Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries.(Section 16 (3) (h))

Complete Annex C

(d) Social, economic or environmental purpose (Section 16 (3) (i))

Complete Annex D

**7. Satisfactory alternatives**

Please explain why there is no satisfactory alternative to carrying out the proposed work affecting the species. You must describe all possible alternatives which were considered and why they were considered unsuitable. You must also consider the option of not undertaking the work. It is not acceptable to state that 'there is no alternative'.

To fulfil Regulation 44(3)(a) of the Habitats Regulations, alternatives to the proposed geophysical survey programme and localised concrete mattress installation works have been considered. Further detail is provided in Section 7.2 of the supporting Orkney – Mainland HVAC 220 kV Subsea Link European Protected Species Risk Assessment.

Alternatives considered include the use of lower impact survey and positioning equipment, alternative approaches to concrete mattress installation, and a “do nothing” option.

The use of alternative survey and positioning equipment was considered; however, the proposed equipment represents current industry standard and is required to safely and accurately position and control underwater survey equipment. The use of alternative equipment would not materially reduce the potential for disturbance and could compromise data quality, equipment safety and operational safety.

Alternative concrete mattress installation approaches were also considered. The proposed method of controlled lifting and placement has been selected as it represents a low-impact approach. Alternative installation approaches would not materially reduce the potential for disturbance to basking shark and could result in similar or greater levels of vessel activity and operational noise.

A “do nothing” alternative, whereby the proposed survey and mattress installation activities do not proceed, was considered. This option is not viable as the survey data are required to inform safe engineering design, and the installation of concrete mattresses at discrete locations is required to ensure the protection and stability of infrastructure. Without these activities, the Orkney – Mainland Subsea Link could not be progressed.

It is therefore concluded that there are no satisfactory alternatives to the proposed activities that would avoid or reduce the potential for disturbance to basking shark.

**8. Other licences / consents**

Please detail below all licences / consents you have applied for or received. Before a licence can be granted, it is essential that other relevant licences or consents have been secured for the proposed activity (eg marine licence).

Type of licence / consent (e.g. marine licence, local planning authority, local works licence)	Date applied for	Reference no.	Date of issue of consent
Marine Licence	25 April 2024	MS-00010803	07 June 2024

## 9. Noise Monitoring

Please indicate if any of the following noise generating activities will be taking place during the operations:

Use of explosives  Piling  Use of acoustic deterrent devices   
Survey equipment operating in the range 10 Hz – 10kHz

If you have ticked any of the above boxes please complete a proposed activity form on the [Marine Noise Registry website](#).

Please note the form must only be completed once for each activity. If you have already completed a form for this activity (eg through the marine licensing process) please give details.

None of the listed noise-generating activities will be undertaken. No explosives, piling or acoustic deterrent devices will be used, and no survey equipment operating within the 10 Hz–10 kHz frequency range will be deployed.

As such, completion of a Proposed Activity form in the Marine Noise Registry is not required.

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

## 10. Scotland's National Marine Plan

Provide details of considerations made with reference to the relevant policies that have been considered.

The proposed geophysical survey and associated localised concrete mattress installation activities have been designed with regard to the relevant General Policies within Scotland's National Marine Plan (2015), particularly those relating to the protection of marine biodiversity and the sustainable use of the marine environment.

GEN 9 (Natural Heritage): The activities have been designed to minimise the risk of disturbance to basking shark and other sensitive receptors. The works are offshore, temporary and localised in nature, which reduces the likelihood of impact.

GEN 13 (Noise): The potential for acoustic disturbance has been considered in accordance with this policy. Survey equipment comprises high-frequency, directional, non-impulsive sources with rapid attenuation in open water, limiting the spatial extent of any potential disturbance. Noise associated with concrete mattress installation is non-impulsive and temporary. Appropriate mitigation measures are proposed to further reduce risk.

GEN 19 (Sound Evidence): This application has been informed by the best available scientific

## 11. Privacy notice

The Scottish Government's Marine Directorate Licensing Operations Team (MD-LOT) has a range of statutory responsibilities including determining applications for licences to disturb or injure marine European protected species (EPS) under the Conservation (Natural Habitats, &c.) Regulations 1994 and The Conservation of Offshore Marine Habitats and Species Regulations 2017 and Basking shark licences under the Wildlife and Countryside Act 1981.

MD-LOT will, where necessary, process personal information including: names, addresses, email addresses and telephone numbers to determine a licence application. Personal information will be stored securely in the Scottish Government's official corporate record.

A full privacy notice can be found on the [Scottish Government website](#). If you are unable to access this, or you have any queries or concerns about how your personal information will be handled, contact MD-LOT at: Marine Scotland - Licensing Operations Team, Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB. Email: [MD.MarineLicensing@gov.scot](mailto:MD.MarineLicensing@gov.scot)

Have you remembered to enclose supporting information with your application, as described in the accompanying guidance? Please check

- |                                          |                                     |
|------------------------------------------|-------------------------------------|
| Completed application form               | <input checked="" type="checkbox"/> |
| Completed annex                          | <input checked="" type="checkbox"/> |
| Map / chart                              | <input checked="" type="checkbox"/> |
| Correct co-ordinates                     | <input checked="" type="checkbox"/> |
| Supporting information / risk assessment | <input checked="" type="checkbox"/> |

## Part C. Declarations

**12.** I have read and understand the guidance provided in this application form. I declare that the particulars given are correct to the best of my knowledge and belief, and I apply for a licence in accordance with these particulars.

I authorise employees or representatives of the Scottish Ministers to enter the site which is subject to this application for the purpose of monitoring and inspecting the permitted works.

### Warning

Under the THE WILDLIFE AND COUNTRYSIDE ACT 1981 (as amended) failure to carry out the work which you propose in accordance with the terms of the licence may expose you to criminal liability. The licensee is responsible for ensuring compliance with the licence.

The Scottish Ministers can modify or revoke a licence at any time, provided there are good reasons. Any licence that may be issued is likely to be revoked immediately if it is discovered that false information was provided and resulted in the issue of a licence.

Under the **THE WILDLIFE AND COUNTRYSIDE ACT 1981 (as amended)**, any person who in order to obtain a licence knowingly or recklessly makes a statement or representation, or furnishes a document or information which is false in a material particular, shall be guilty of an offence and may be liable to criminal prosecution. Any person found guilty of such offences is liable on summary conviction to imprisonment for a term not exceeding six months or to a fine not exceeding level 5 on the standard scale (currently £5,000), or to both imprisonment and a fine.

**Note:** Previous convictions for wildlife offences will be taken into account and in some cases may mean that the Scottish Ministers do not consider it appropriate to grant a licence.

[Redacted]  
Signature of the  
Applicant

Date **03/03/2026**

(The person named at part 1)

Name in block letters [Redacted]

Note – If signing on behalf of a company, please append your signature with “on behalf of company name”.

The completed application should be signed and sent to Marine Directorate Licensing Operations Team (MS-LOT) at the address below or emailed to [MD.MarineLicensing@gov.scot](mailto:MD.MarineLicensing@gov.scot)

Please remember to include all supporting information.

Marine Directorate - Licensing Operations Team  
Scottish Government  
375 Victoria Road  
Aberdeen  
AB11 9DB

### Disclaimer

While every effort has been made to ensure the information contained in this document is accurate, nothing in this document should be taken to replace the current legislation in force at this time. You are advised to obtain qualified legal advice in relation to your rights and responsibilities under the 1981 Act and other legislation.

**Annex A**

Only to be completed if you selected for preserving public health or public safety in question 6 of the application form

Please complete all questions

Give details of the risk to public health or safety

How has the risk been identified? Please give details of any expert advice received.

How will the proposed activity address the identified risk?

**Annex B**

Only to be completed if you selected for preventing the spread of disease in question 6 of the application form

Please complete all questions

What disease(s) is / are at risk of being spread if the proposed activity does not go ahead? Please give details of any expert advice received.

How will the proposed activity prevent the spread of disease? Please give details of any expert advice received.

**Annex C**

Only to be completed if you selected for preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries in question 6 of the application form.

Please complete all questions

What serious damage has occurred or will occur if the proposed activity does not go ahead? Please give details of any expert advice received.

How will the proposed activity prevent serious damage? Please give details of any expert advice received.

## **Annex D**

Only to be completed if you selected for a social, economic or environmental purpose in question 6 of the application form

Please complete all questions

What benefits will be provided by the proposed activity? Give details and indicate if they are social, economic or environmental. Please indicate if the benefits are short or long term.

The proposed Orkney – Mainland Subsea Link will deliver significant environmental, economic and social benefits at a national and regional scale. The geophysical survey and associated localised concrete mattress installation activities are essential enabling works required to allow the project to be progressed safely and effectively.

**Environmental benefits (long term):** The project will facilitate the export of renewable electricity generated on the Orkney archipelago to the national transmission network, supporting the reduction of greenhouse gas emissions and contributing to Scotland's transition to a low-carbon energy system. This directly supports the targets set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, including the commitment to achieve net-zero emissions by 2045.

**Economic benefits (long term):** The provision of increased transmission capacity will enable existing and future renewable energy developments in Orkney, supporting investment, employment and economic activity associated with the renewable energy sector and its supply chains.

**Social benefits (long term):** By supporting the development of renewable energy and strengthening electricity transmission infrastructure, the project contributes to energy security and the delivery of national climate and energy objectives that provide wider societal benefits.

The proposed survey and concrete mattress installation activities are necessary to realise these benefits and are therefore considered to be justified by Imperative Reasons of Overriding Public Interest.

What public interest will be served? Who will benefit from the proposed activity? Does the proposed activity address a need?

The proposed activity serves the public interest by enabling the delivery of critical electricity transmission infrastructure required to support the transition to a net zero energy system in Scotland and the wider UK. The UK and Scottish Governments have set legally binding targets to reduce greenhouse gas emissions and increase renewable energy generation, as set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

The Orkney – Mainland Subsea Link addresses a clear national and regional need by providing the transmission capacity required to export renewable electricity generated on the Orkney archipelago to mainland Scotland. Without this connection, existing and future renewable generation in Orkney would be constrained, limiting progress towards decarbonisation objectives.

The proposed geophysical survey and associated localised concrete mattress installation activities are necessary enabling works that allow the project to be planned and delivered safely. These activities support the development of infrastructure that will benefit the wider public through reduced reliance on fossil fuels, improved energy security and long-term environmental benefits associated with a low-carbon energy system.

The primary beneficiaries of the proposed activity are the wider public at local, regional and national levels, through the delivery of renewable energy infrastructure that supports climate targets, economic growth and the transition to a sustainable energy system.

Why is it imperative the proposed activity goes ahead?

The proposed activity is imperative to enable the delivery of the Orkney – Mainland Subsea Link, which is required to provide additional electricity transmission capacity between Orkney and mainland Scotland. This transmission connection is necessary to facilitate the export of renewable electricity generated on the Orkney archipelago to the national transmission network, supporting Scotland's and the UK's decarbonisation and net zero objectives.

The Orkney – Mainland Subsea Link cannot progress safely to detailed design, planning and consenting stages without the completion of the proposed geophysical and visual survey works. These surveys are required to characterise seabed conditions, identify existing infrastructure and obstructions, and inform engineering design.

In addition, the localised installation of concrete mattresses at discrete locations is required to ensure the protection and stabilisation of infrastructure crossings. Without these enabling works, the project could not be progressed safely or effectively. The proposed activities are therefore essential and imperative to the delivery of nationally important electricity transmission infrastructure.

Does the proposed activity support any local regional or national policies? Please give details. Are you fulfilling a statutory role?

The proposed activities do not fulfil a statutory role. However, by enabling the development of electricity transmission infrastructure required to support the export of renewable electricity from Orkney to mainland Scotland, the proposed survey and associated localised concrete mattress installation works support a range of local, regional and national policies, including:

- The UK Net Zero Strategy.
- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the associated Scottish Government Energy Strategy.
- Scotland's National Strategy for Economic Transformation.
- National developments identified within the Scottish National Planning Framework 4, which support the delivery of electricity generation and associated grid infrastructure.
- Policy 7c(i) of the Orkney Local Development Plan (2017–2022), which supports renewable and low-carbon energy developments and associated transmission infrastructure where environmental effects can be appropriately managed.