

Date: 29 September 2023

Ref: LF000009-CST-OF-LIC-LET-0027

Seagreen Wind Energy Limited
c/o SSE plc
1 Waterloo Street
Glasgow
G2 6AY

Anna Shenton
Marine Licensing Casework Officer
Marine Directorate
Marine Laboratory
375 Victoria Road
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Dear Anna,

**Seagreen Alpha and Seagreen Bravo Offshore Wind Farms
Application to vary Marine Licence MS-00010440**

This letter constitutes an application by Seagreen Wind Energy Ltd ('Seagreen' hereafter) for a variation to Marine Licence MS-00010440 ('the ML' hereafter) which authorises the installation of export cables at landfall using an 'open cut trenching' method as an alternative to horizontal direct drilling (HDD) as authorised under the offshore transmission assets (OTA) Marine Licence (current reference MS-00010078).

Variation sought

Extension of the validity of the ML from 31 December 2023 to **31 December 2024** to allow the completion of the cable duct installation works.

Background

Since 2021, Seagreen has applied to MD-LOT to vary the ML on a number of separate occasions to extend the validity of the ML due to delays in the landfall construction and duct/export cable installation programme. These delays have been caused by cable fabrication delays, remedial works following storm damage and ongoing difficulties in burying the nearshore cable ducts to the required depth. The August 2021 variation also permitted the use of rock nets as temporary ballast for the HDPE duct ends to provide stabilisation before and during export cable pull in.

In June 2023, Seagreen's export cable contractor had still not achieved the burial of the nearshore cable ducts to the required depth as specified in the Environmental Report supporting the original ML application (ref. LF000009-CST-OF-REP-0021) and as required to minimise the risk of exposure within the lifetime of the assets. A further extension to the validity of the Marine Licence was therefore sought (LF000009-CST-OF-LIC-LET-0023) to allow time for Seagreen and its Contractor to make further attempts at burial and explore the use of alternative methodologies to complete the works. A varied ML was issued on 29 June 2023 (MS-00010440) with an expiry date of 31 December 2023.

Since July 2023, efforts have continued to review the nearshore survey data and identify an effective method of burying the ducts to the required depth. A number of potential solutions have been identified. However, each of these solutions requires further assessment and detailed engineering to

determine its feasibility. Until that is completed, it is not possible to set out a detailed programme for completion of the works. Taking vessel and contractor availability into account, it is now clear that the works will not be completed before the expiry of MS-00010440.

All ducts are buried in the seabed to some extent and do not therefore present a hazard to navigation. Seagreen has assessed the likelihood of duct exposure within the lifetime of the project (based on their current burial depths and the sedimentary and hydrodynamic regime in this section of the Angus coast) and concluded that leaving the ducts 'as is' is not acceptable in the long term. Further efforts to bury the ducts deeper into the seabed is therefore essential. However, the engineering assessments and contractor and vessel mobilisation processes will not be complete before the end of 2023. Given that the works are to some extent weather dependent, further works in the nearshore area are unlikely to take place until spring 2024 at the earliest. Based on engineering assessments of the current position of the ducts, Seagreen are satisfied that they will remain buried until remedial works take place and that the forthcoming winter conditions are unlikely to result in movement or exposure of the ducts. No risks to the intertidal area or to other users of the sea are foreseen. Seagreen will however ensure that the intertidal area is inspected following any significant storm events to confirm that this remains the case.

Seagreen is seeking a variation of MS-00010440 to allow sufficient time for the completion of the required duct burial works until 31 December 2024. It is expected that all works will be complete well before December 2024, however there is desire to ensure that another extension of time variation is not required and at this time it is difficult to be more prescriptive regarding programme. Furthermore, while Seagreen's preference is for the works to be carried out in accordance with the methodologies and specifications set out in the Environmental Report and existing ML, there may be a requirement to further vary the ML to allow for alternative methods (including the potential for additional deposits) to achieve the required burial or protection of the assets by other means.

Impact assessment

Seagreen confirm that the main landfall construction and cable installation works (below MHWS) are substantially complete. The requested extension is to allow the completion of the trenching of the cable ducts at landfall.

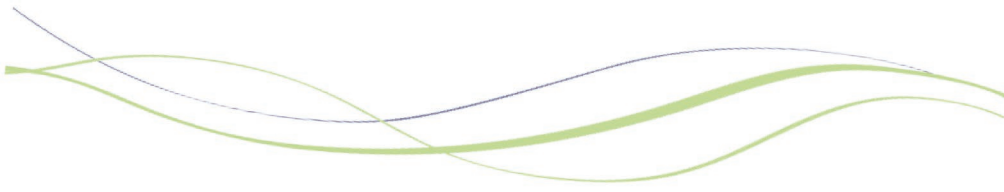
Works at landfall will, where possible, progress in line with the Environmental Report supporting the original ML application. If that is the case, Seagreen is satisfied that no further assessment is required and that the conclusions of the report remain valid. Seagreen are therefore satisfied that the extension of the construction period to December 2024 will not have any adverse effects on the marine environment due to the spatially very limited extent of the works and the substantial break in works while solutions are identified and assessed.

If any departure from the Environmental Report is necessary, a further application to vary the ML will be submitted and any updates or supporting information will be provided accordingly.

Other matters

The works will continue to be subject to the requirements of the ML, the OTA Marine Licence and all other licences and consents that apply to the works.

All landfall works will continue to be communicated via Notices to Mariners and Weekly Notices of Operations.



An amendment to the Construction Programme is required and this will be submitted to MD-LOT under separate cover.

I trust this letter provides all the information necessary for MD-LOT to determine a variation to the ML and we look forward to your positive response.

Yours sincerely,

[Redacted]

Ellie Noble
Consents Team Manager
For and on behalf of
Seagreen Wind Energy Limited