



Scottish & Southern
Electricity Networks



North of Scotland

0800 300 999



Central Southern England

0800 072 7282

Stephanie Sweeting
Marine Scotland
Licensing Operations Team
PO Box 101
375 Victoria Road
Aberdeen
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28 September 2018

Our ref. 14992283
Your ref.

Dear Stephanie

Marine Licence Application for a replacement submarine electricity cable between Bute and Cumbrae

Scottish Hydro Electric Power Distribution plc holds a licence under the Electricity Act 1989 for the distribution of electricity in the north of Scotland including the Islands. It has a statutory duty to provide an economic and efficient system for the distribution of electricity and to ensure that its assets are maintained to ensure security of supply to customers.

A replacement for the submarine electricity cable from Bute to Cumbrae in Clyde is proposed. The existing 11kV cable was installed in the 1980s and is nearing the end of its operational life.

The new cable will be further north and will avoid cable crossings, rocky shore ends and provide a more secure long-term route.

The 11kV cable will be replaced with a 33kV cable but operated at 11kV. This allows for future network upgrades on this circuit that are foreseen to be required in the future.

The marine licence application form for this cable replacement is supported by the following documents:

▪ **Project Description**

The cable protection design and construction methodology considers the seabed conditions, a risk assessment of other marine users and stakeholder feedback, whilst also providing a cost effective approach which ensures a safe, reliable supply. It also contains the scheduling

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of works, construction techniques and the unexploded ordnance management strategy. The Project description should be read with the Cable Burial Risk Assessment supporting information.

The detailed Project Description will be of interest to all parties.

- **Pre-application Consultation Report (appended by Cost Benefit Analysis Model)**

As part of the marine licencing process, early engagement has been undertaken with the general public and all interested stakeholders. The Pre-application Consultation Report states how their views have been considered and have influenced our approach to cable design, installation and protection.

The Pre-application Consultation Report is required by the Marine (Scotland) Act 2010: Section 24; and will be of interest to Marine Scotland Licensing Operations Team (MS-LOT).

- **Environmental Supporting Information**

Whilst a full Environmental Impact Assessment is not required for submarine cables, Marine Scotland advises, in their Guidance for Marine Licence Applicant Version 2 June 2015 (Marine Scotland, 2015), that “applicants for marine licences for submarine cables should consider the scale and nature of their projects and give consideration to the need for a proportionate environmental assessment”.

For larger projects, where there is potential for the subsea cable to impact key environmental receptors, it is recommended by Marine Scotland (Marine Scotland, 2015), that an assessment of potential impacts on these receptors is carried out. Results from this assessment along with other relevant information about the Project should then be provided to support the Marine Licence application. This is detailed within the Environmental Supporting Information document (should be read in conjunction with the Fishing Liaison and Mitigation Action Plan) which makes a proportionate environmental assessment of the project against receptors in the vicinity of the works.

The Environmental Supporting Information document will be of interest to MS-LOT, Scottish Natural Heritage, Scottish Environment Protection Agency, Historic Environment Scotland, Peel Ports, Local authorities, and other environmental parties.

- **Fishing Liaison and Mitigation Action Plan covering all legitimate sea users**

An assessment of potential construction and cable asset interactions with all legitimate sea users, in the vicinity of the Bute and Cumbrae submarine electricity cable, as well as near other future cable replacements, was undertaken and is described in the Fishing Liaison and Mitigation Action Plan (FLMAP) covering all legitimate sea users.

The FLMAP provides an overview of the fisheries and legitimate sea user consultation, liaison and communication strategy, engagement, safety issues and mitigation strategies. As such, it will be developed and updated through the cable lifecycle. It will also form an audit trail, documenting that communication and liaison between us and legitimate sea users.

This document is of interest to MS-LOT, Maritime Coastguard Agency, Northern Lighthouse Board, Local authority Marine Services and legitimate sea users.

▪ **Construction Environment Management Plan**

Mitigation measures, monitoring and reporting procedures which have been incorporated into the design and installation of the replacement cable in order to prevent or reduce adverse environmental affects as much as possible are detailed with the Construction Environment Management Plan.

This document is of interest to MS-LOT, Scottish Natural Heritage, Scottish Environment Protection Agency, Historic Environment Scotland, Local authorities and other environmental parties.

▪ **Operation, Inspection, Maintenance and Decommissioning Strategy**

The Operation, Inspection, Maintenance and Decommissioning Strategy sets out the approach to:

- Operation: following installation of the cable, connection and energisation to the network
- Inspection: the visual inspection or tracking of the cable following installation
- Maintenance: remedial works driven by condition based information or following inspections in the marine and/or land environments
- Decommissioning: follows de-energisation of the cable at the end of its operational life

This document will be of interest to MS-LOT, Peel Ports and Local authorities.

▪ **Marine licence application form**

This outlines the nature of the proposal to install a replacement cable between Bute and Cumbrae in the Clyde. It is appended with charts, JNCC initial noise registration form and the route corridor coordinates spreadsheet.

This document will be of interest to MS-LOT.



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If you require any further information please let us know.

Yours sincerely



Kirstine Wood
Lead Engagement and Submarine Policy Manager