



Eastern Green Link 3

Marine Environmental Appraisal

Chapter 13 - Other Marine Users

Prepared for: Scottish Hydro Electric Transmission plc (SHE-T)



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Abbreviations/Glossary

AIS	Automatic Identification Systems
BSAC	British Sub-Aqua Club
CCS	Carbon Capture and Storage
CEMP	Construction Environmental Management Plan
CES	Crown Estate Scotland
CLV	Cable lay vessel
CSV	Construction support vessels
DESNZ	Department for Energy Security and Net Zero
EGL	Eastern Green Link
EIA	Environmental Impact Assessment
ESCA	European Subsea Cable Association
FMMP	Fisheries Management and Mitigation Plan
GW	Giga Watt
GIS	Geographical Information System
HVDC	High Voltage Direct Current
IMO	International Maritime Organisation
INTOG	Innovation and Targeted Oil & Gas
JUB	Jack-up barge
Km	Kilometre
KP	Kilometre Points
m	Metre
MARPOL	Prevention of Pollution at Sea Regulations
MCAA	Marine and Coastal Access Act
MD-LOT	Marine Directorate – Licensing Operations Team
MEA	Marine Environmental Appraisal
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MMMP	Marine Mammal Mitigation Plan
MPCP	Marine Pollution Contingency Plan
MoD	Ministry of Defence
Mt	Megatonne
NAVAREA	Navigational Area
NAVTEX	Navigational Telex
NGET	National Grid Electricity Transmission
NM	Nautical Mile
NMPi	National Marine Plan Interactive tool
NRA	Navigation Risk Assessment
NSTA	North Sea Transition Authority
NtM	Notice to Mariners
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OWE	Offshore Wind Energy



OWF	Offshore Wind Farm
PEXA	Practice Exercise Area (MoD)
PLGR	Pre-Lay Grapnel Run
RLB	Red Line Boundary
RYA	Royal Yachting Association
SEPA	Scottish Environment Protection Agency
SMP	Sectoral Marine Plan
SOLAS	Safety of Life at Sea
TCE	The Crown Estate
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
Zol	Zone of Influence



13. Other Marine Users and Activities

13.1. Introduction

This chapter of the Marine Environmental Appraisal (MEAp) describes the potential impacts arising from the construction, operation and maintenance, and decommissioning of the Proposed Development, on other marine user receptors including:

- Offshore wind farms (OWFs)
- Other power and telecommunication cables
- Disposal sites
- Aggregate extraction sites
- Munitions Disposal Sites
- Ministry of Defence (MoD) Sensitive Areas
- Oil and Gas Operations
- Carbon Capture Storage (CCS) and natural gas storage sites
- Recreational activities (note that recreational boating is covered in **Chapter 11: Shipping and Navigation**)
- Angling – including chartered anglers (note that commercial fishing is covered in **Chapter 12: Commercial Fisheries**).

For the purposes of seeking the necessary consents, the Eastern Green Link (EGL) 3 Project has been split into different ‘Schemes’ i.e. English Onshore Scheme, English Offshore Scheme, Scottish Onshore Scheme and the Scottish Offshore Scheme (with the latter herein after referred to as ‘the Proposed Development’). Collectively all components of EGL 3 are referred to as “the Project”.

A description of the works expected to be undertaken during construction, operation and maintenance and decommissioning of the Proposed Development is provided in **Chapter 3: Project Description**. The Proposed Development, defined spatially by the Red Line Boundary (RLB), includes approximately 145 kilometres (km) of subsea High Voltage Direct Current (HVDC) cables. The RLB extends from mean high water springs (MHWS) at the proposed landfall at Sandford Bay, Scotland, to the boundary with adjacent English waters and is nominally 7500 metres (m) wide. This width is considered adequate to micro-route around a sensitive seabed feature or habitat, or to allow for the footprint of installation vessels and is the maximum extent of seabed in which construction and operation of the Proposed Development may take place. The RLB is shown in **Figure 13-1 (Drawing reference C01494-EGL3-MEA-INFR-002-A)**.

As set out in **Chapter 1: Introduction**, cable installation and some associated activities beyond 12 nautical miles (NM) are exempt from the requirement to obtain a Marine Licence under the Marine and Coastal Access Act 2009 as well as repair of the installed cable in onshore and offshore waters. This chapter presents an assessment of the effects of the Proposed Development from MHWS at the Sandford Bay landfall to the border with English adjacent waters. This is to provide a holistic view of the Proposed Development and any associated impacts. However, consent is not being sought for the exempt cable (either installation or repair) and only cable protection would be included in the Marine Licence beyond 12 NM.

Kilometre Points (KPs) are used within this chapter to provide context as to where within the Study Area a feature lies (see **Section 13.1.1** for definition of Study Area). KP 436 is defined at the border with adjacent English waters, while KP 580 is defined at the proposed Scottish landfall in Sandford Bay, Peterhead.

The MEA Non-Statutory Scoping Report identified that there is a source-receptor pathway between the Proposed Development and OWFs, power and telecommunication cables, CCS, aggregate extraction sites, oil and gas operations and recreational activities. The other receptors were found to have no source-receptor pathways and therefore were not considered by the Marine Environmental Assessment (MEA).

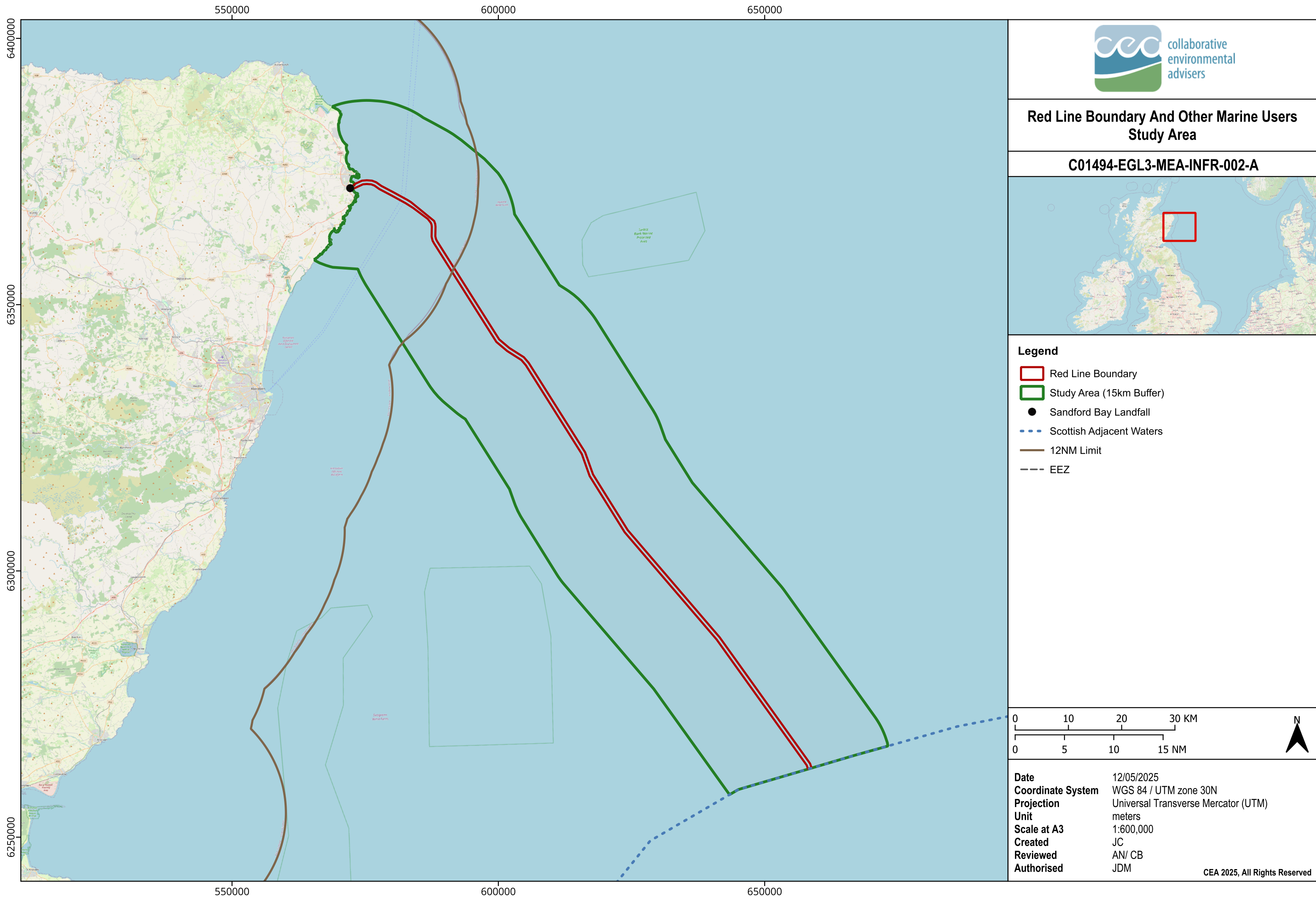
This chapter should be read in conjunction with:

- **Chapter 3: Project Description**
- **Chapter 6: Marine Physical Processes** which identifies the spatial extent of potential impacts from temporary sediment suspension and subsequent redeposition
- **Chapter 11: Shipping and Navigation** which identifies the spatial extent of potential impacts on recreational boating receptors; and
- **Chapter 12: Commercial Fisheries** which identifies the spatiotemporal extent of potential impacts on commercial fishery activities.



13.1.1. Study Area

The Proposed Development will route from MHWS at Sandford Bay, Peterhead, to the border between Scottish and English adjacent waters. The Study Area for other marine users, relevant to the MEA, includes the RLB to MHWS plus an additional 15 km buffer on either side (hereafter in this chapter referred to as the “Study Area”). **Chapter 6: Marine Physical Processes** establishes 15 km as a precautionary zone of influence (Zol) within which the deposition of suspended sediments would occur. This therefore represents the maximum Zol for direct and indirect impacts on other marine users. This buffer also encompasses the 5 NM buffer either side of the RLB consistent with the shipping and navigation assessments (**Chapter 11: Shipping and Navigation**). The Study Area is shown in **Figure 13-1 (Drawing reference C01494-EGL3-MEA-INFR-002-A)**.





13.2. Data Sources

The Other Marine Users baseline characterisation has been determined based on a review of publicly available information, project-specific survey data and consultation with relevant organisations. This provides a robust, up-to-date characterisation of the baseline within the Study Area in accordance with relevant guidance for this topic.

13.2.1. Site-Specific Survey Data

Extensive information is available regarding Other Marine Users of the North Sea. Following a detailed review of this data to inform the scope of assessment as presented, no site-specific surveys were required for Other Marine Users.

13.2.2. Publicly Available Data

A desk-based review of publicly available data sources (literature and GIS mapping files) has been used to identify infrastructure and other users which are described in this baseline.

A summary of the organisations that have supplied data, together with the nature of that data is outlined in **Table 13-1**.

Table 13-1: Data sources used to inform the Other Marine Users assessment

Data Source	Description	Reference
Crown Estate Scotland (CES)	Map and documents in Scottish waters only, including spatial data for offshore renewables, cable and pipelines activities, wind export cable agreements, carbon capture and storage, and aquaculture sites	CES (2022)
The Crown Estate (TCE)	OWF lease agreement areas, Marine Aggregate sites, Carbon Capture and Storage sites (TCE, CCUS and Offshore Wind Overlap Study Report, Study Findings and Recommendations, 2021)) Natural Gas Storage sites	TCE (2023)
Marine Management Organisation (MMO)	Data sources for licensed aggregate and disposal sites and OWFs.	MMO (2025)
Kingfisher Information Service – Offshore Renewable Cable (KIS-ORCA)	KIS-ORCA data is available free of charge to skippers and includes Northern European cables and UK renewable energy structures	KIS-ORCA (2024)
North Sea Transition Authority (NSTA), Department for Energy Security and Net Zero (DESNZ), Offshore Petroleum Regulator for Environment and Decommissioning	Hosts data on current and historical oil and gas infrastructure	NTSA (2023)
EMODnet	EMODnet is a consortium of organisations assembling European marine data, data products and metadata from diverse sources in a uniform way. In this chapter human activities data will be used such as aggregates, disposal, and offshore windfarm sites	EmodNET (2023)
European Subsea Cable Association (ESCA)	Information for developers on offshore renewable and submarine cable infrastructure	ESCA (2023)
Royal Yachting Association (RYA)	UK Coastal Atlas of Recreational Boating and Search Results Where's My Nearest for sailing clubs local to the Landfall	RYA (2019)
British Sub Aqua Club (BSAC)	UK dive organisation with clubs located around the UK	BSAC (2025)
Divemap	Interactive map showing dive sites around the UK	Divemap (2025)
UK Bathing Waters	Government List of Current UK Bathing Waters	Gov.uk (2023)
Marine Scotland, National Marine Planning Interactive (NMPi)	Spatial data on dredging and disposal sites, marine aggregates, aquaculture, and recreational uses	NMPi (2022)
National Grid Electricity Transmission (NGET) and	Eastern Green Link 2 Environmental Appraisal Report	(AECOM, 2022)



Data Source	Description	Reference
Scottish Hydro Electric Transmission plc		
NMPi	Recreational and tourism studies and surveys commissioned by governmental entities, including Scottish Marine Recreation & Tourism Survey	NMPi (2015)
MMO	Mapping recreational sea anglers in English waters	MMO (2020)
STR	East Lothian Visitor Survey	STR (2021)
UK Hydrographic Office (UKHO)	Military Practice and Exercise Areas	UKHO (2021)

13.3. Consultation

13.3.1. Non-Statutory Scoping

In January 2024, a MEA Non-Statutory Scoping Report was submitted to the Scottish Government - Marine Directorate as part of a pre-application consultation exercise for the Proposed Development. Responses from consultees were received on 15 July 2024.

Table 13-2 summarises the comments received relevant to the Other Marine Users assessment, and the regard given to these in preparing the chapter.

Table 13-2: Summary of Scoping Opinion responses for other marine users

Consultee	Comments	Response
RYA Scotland	The team already have sufficient information about the movements and courses of recreational craft. Note that only about a quarter of recreational craft in these waters transmit an AIS signal. However, the tracks of those that do should be representative of all cruising recreational craft except perhaps near the landfall sites. We can supply additional information in relation to section 11.4.4 and 11.5.2 during the Navigation Risk Assessment (NRA).	The limitations of AIS coverage have been noted within the MEAp (Section 13.4.1.9).

13.4. Baseline Characterisation

13.4.1. Overview

The baseline characterisation sections include information on OWFs, power and telecommunication cables, CCS and natural gas storage sites, aggregate extraction sites, and oil and gas operations.

13.4.2. Offshore Wind Farms (OWF)

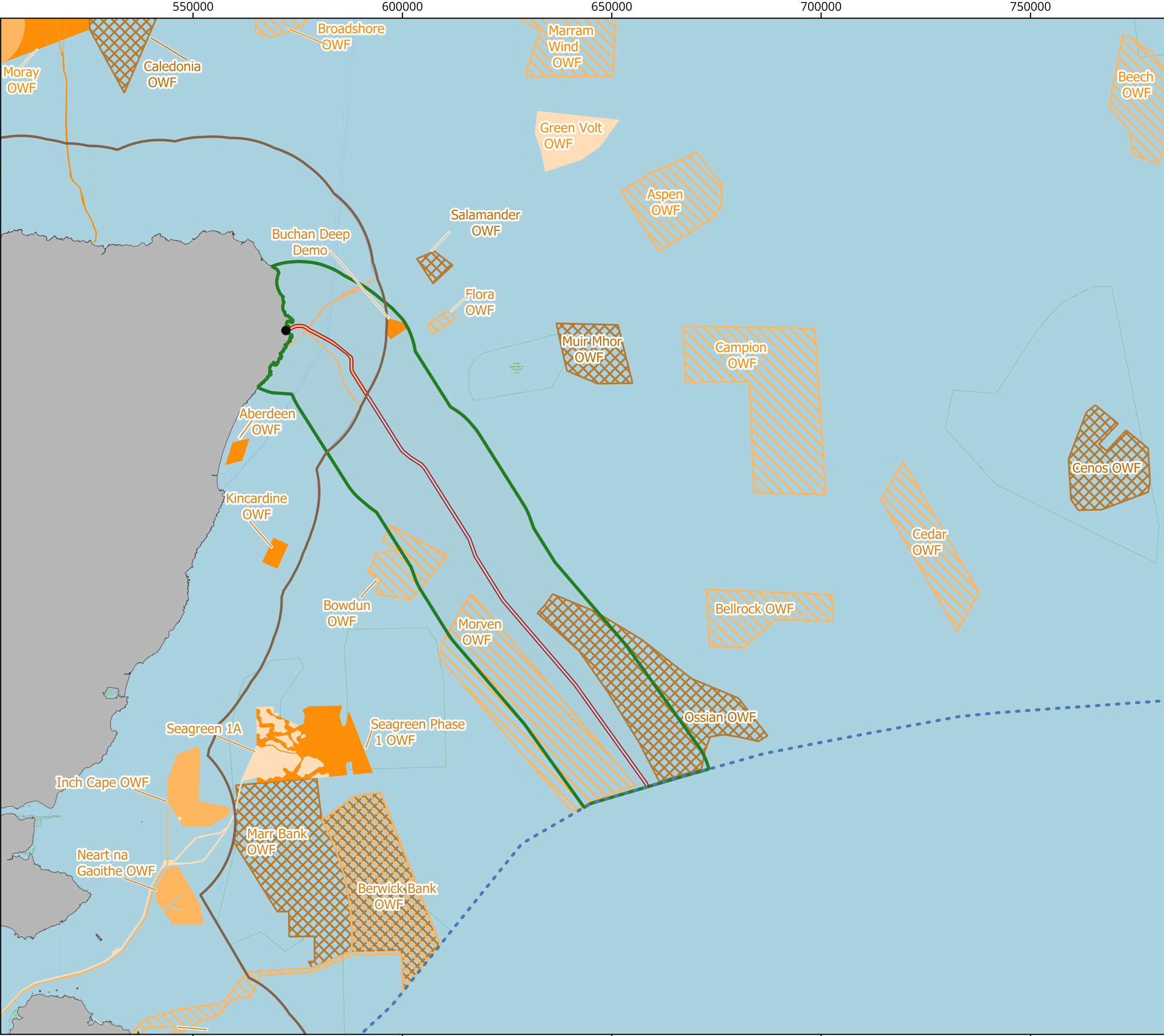
Following desktop analysis of Crown Estate Scotland GIS data, several OWFs were identified (as shown in **Figure 13-2 (Drawing reference C01494-EGL3-MEA-INFR-003-B)**). There is one operational OWF within 15 km of the Proposed Development (Hywind Demo Site at Buchan Deep). There are three OWFs within the Study Area in the planning stages; Bowdun OWF and Morven OWF are in pre-planning, and Ossian OWF is in its planning phase. **Table 13-3** shows the distance from the RLB to these OWFs. Although some of the OWFs shown in **Figure 13-2 (Drawing reference C01494-EGL3-MEA-INFR-003-B)** are more than 15 km away from the Proposed Development, their inclusion in the figure is due to the possibility that their export cables would intersect with the RLB.

Table 13-3: Distance from RLB to existing or planned OWFs within the Study Area

OWF name	Operator	Status	Distance from RLB	Proposed Development could cross OWF export cables
Buchan Deep Demo site (also known as Hywind)	Hywind (Scotland) Ltd Equinor ASA, Masdar	Floating windfarm commissioned in 2017 (operational).	9.6 km	No
Morven Windfarm, also known as Plan Option Area E1,	BP plc, EnBW Energie Baden-Württemberg AG	Pre-Planning	1.8 km	(to be determined upon consent application)



OWF name	Operator	Status	Distance from RLB	Proposed Development could cross OWF export cables
Phoenix 1A+1B (TEC Register)				
Ossian Wind Farm	SSE Renewables, Japanese conglomerate Marubeni Corporation (Marubeni) and Danish fund management company Copenhagen Infrastructure Partners (CIP)	Planning	2.4 km	(to be determined upon consent application)
Bowdun OWF also known as Cluaran Deas Ear, Plan Option Area E3	Thistle Wind Partners DEMA CONCESSIONS NV, Qair Marine (formerly Quadran Energies Marines), Aspiravi Holding NV	Pre-Planning	5.9 km	No



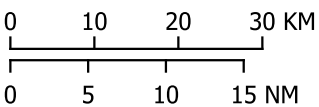
Offshore Wind Infrastructure

C01494-EGL3-MEA-INFR-003-C



Legend

- Sandford Bay Landfall
- Red Line Boundary
- Study Area (15km)
- Offshore Wind**
 - Operational
 - Under Construction
 - Consented
 - In Planning
 - Pre Planning
- Scottish Adjacent Waters
- 12NM Limit



Date	05/08/2025
Coordinate System	ETRS89 / UTM zone 30N
Projection	Universal Transverse Mercator (UTM)
Unit	meters
Scale at A3	1:900,000
Created	JC
Reviewed	AN/ CB
Authorised	JDM

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13.4.3. Power and Telecommunications Cables

Within the Study Area there is one planned interconnector project, one planned reinforcement power cable project, one active telecommunication cable, and two OWFs yet to be consented; their proposed transmission/cable routes cross the RLB. These are listed in **Table 13-4** and are illustrated in (**Drawing reference C01494-EGL3-MEA-INFR-004-D**)

Table 13-4: Distance from the RLB to existing or planned power or telecommunication cables within the Study Area

Cable Name	Developer	Type	Project information	Distance from the RLB
North Connect KS	Lyse, Agder Energi, Hafslund E-Co and Vattenfall	Interconnector	Partly Consented Application approved in Scottish waters in 2020, but Norway refused interconnector licence March 2023 (Energyworld.com, 2023). MS Application Ref: 06771 & 06870. Scottish Licence has expired, and Cenoss OWF are now taking on the licensing for the North Connect route between landfall and the associated windfarm.	This has been assessed as the Cenoss OWF.
Cenoss OWF transmission infrastructure	Flotation Energy and Vårgrønn	OWF (transmission)	Permitting - consent application submitted to MD-LOT in 2025. MS Application Ref: 00011091	Crosses
Aspen OWF transmission infrastructure	Cerulean Winds	OWF (transmission)	Pre-application stage. MS Application Ref: SCOP-0066	Crosses
Eastern Green Link 2 (EGL 2)	National Grid and Scottish and Southern Electricity Networks Transmission	Reinforcement power cable	Application submitted to MMO 2022. Provisional permission was granted by OFGEM March 2024 Marine Scotland Licence granted July 2023. Construction due to start Autumn 2024 to 2029. MS Application Ref: 00009943	Co-located at landfall
TAMPNET CNSFTC	Tampnet	Telecom	Active	Crosses
MarramWind scoping boundary	ScottisPower and Shell	OWF	Pre-Application – MS Application Ref: SCOP-0020	Crosses

Several of the OWF export cables commissioned by ScotWind (an offshore wind leasing round in Scottish waters) may cross or exist in proximity to the Proposed Development. However, at this stage the project data is not currently available to show their proposed export cable routes. Cenoss OWF and Aspen OWF therefore form the future rather than current baseline. For the purposes of assessment these have been assumed to be in place prior to construction of the Proposed Development.

13.4.4. Disposal Sites

Disposal sites within/close to the Study Area are presented in **Figure 13-3** (**Drawing reference C01494-EGL3-MEA-INFR-004-D**).

There are six disposal sites in proximity of the Proposed Development within the Study Area as shown in **Figure 13-3** (**Drawing reference C01494-EGL3-MEA-INFR-004-D**). **Table 13-5** shows the distance from the RLB to these sites.

Table 13-5: Distance from the RLB to disposal sites within the Study Area

Disposal Site Name	Status	Distance from the RLB
South Buchan Ness, CR100	Closed	Crosses
South Buchan Ness B, CR105	Closed	Crosses
Peterhead Harbour, CR071	Open	1.9 km



Disposal Site Name	Status	Distance from the RLB
Middle Buchan Ness (CR090)	Closed	1.3 km
Middle Buchan Ness B, CR095	Closed	1.1 km
Notch Buchan Ness	Closed	1.2 km

13.4.5. Oil & Gas Operations

Innovation and Targeted Oil and Gas (INTOG) is a Scottish leasing round for offshore wind projects that would directly reduce emissions from oil and gas production and boost further innovation. Whilst an INTOG Energy Application Area exists offshore from Peterhead, this is outside the Study Area.

There are only two oil and gas pipelines that cross the RLB; one is active (Forties C to Cruden Bay – PL721) and one is abandoned (Forties C to Cruden Bay - PL8). These are listed in **Table 13-7**.

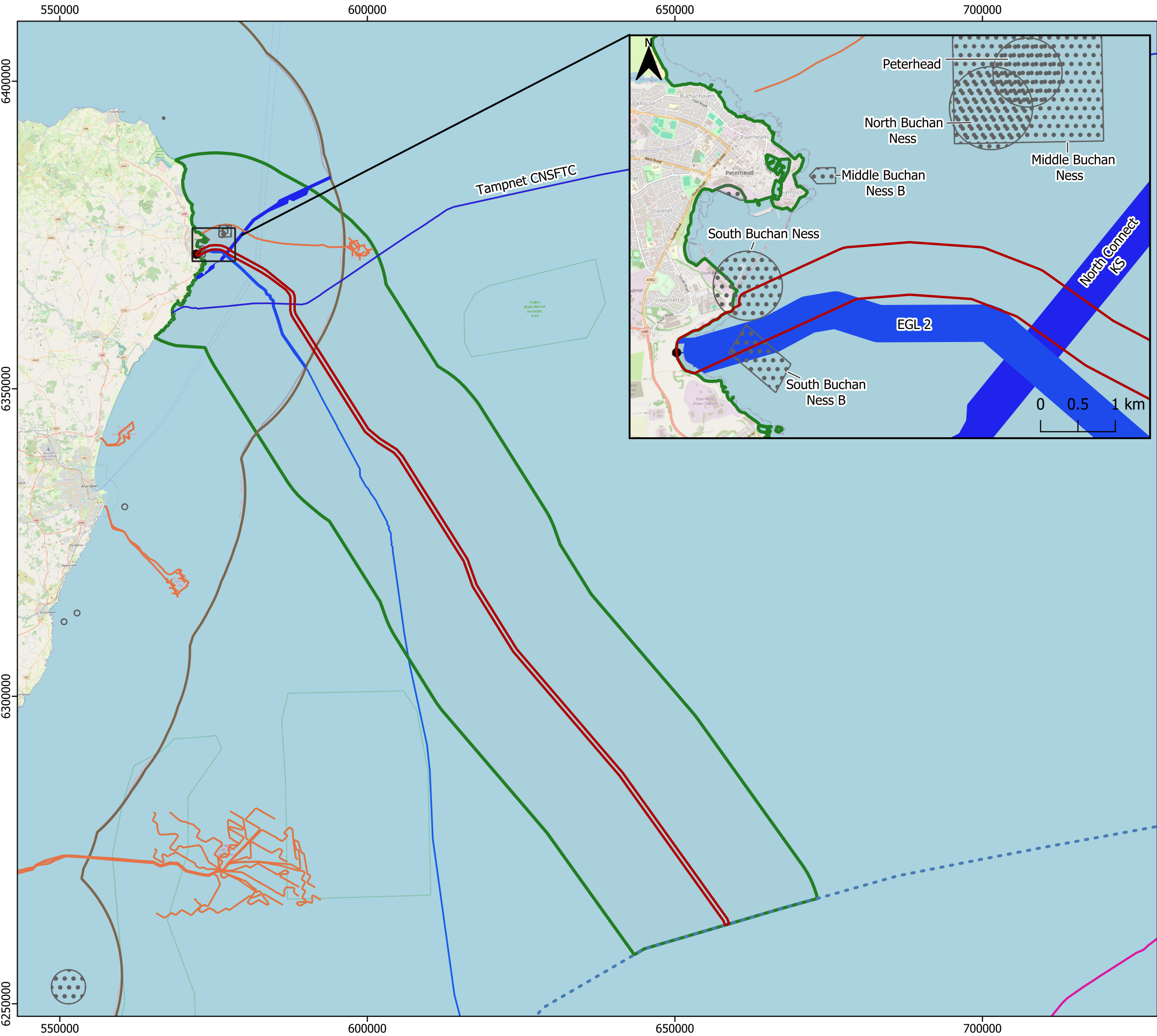
Table 13-6: Oil and Gas pipelines that cross the RLB (NSTA, 2023)

Name	Operator	Type	Status
FORTIES C TO CRUDEN BAY (PL721)	Ineos FPS Ltd	Oil	Active
FORTIES C TO CRUDEN BAY (PL8)	Ineos FPS Ltd	Oil	Abandoned

The RLB does not pass through any Scottish oil and gas licensed blocks, though the Study Area marginally intercepts a NSTA Licenced Block at the south eastern extent (**Figure 13-4 (Drawing reference C01494-EGL3-MEA-INFR-005-A)**).

13.4.6. Carbon Capture Storage and Natural Gas Storage

There is one Carbon Capture Storage (CCS) project which is at the planning stage called Acorn CCS which lies to the north of Peterhead. **Figure 13-5 (Drawing reference C01494-EGL3-MEA-INFR-008-A)** shows the project's location in proximity to the Study Area. The objective of the project is to store around 240 megatonnes (Mt) of CO₂ in geological formations 2.5 km below the seabed (The Acorn Project, 2023).



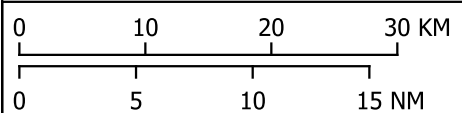
**Cables And Disposal Sites
Within The Study Area**

C01494-EGL3-MEA-INFR-004-D



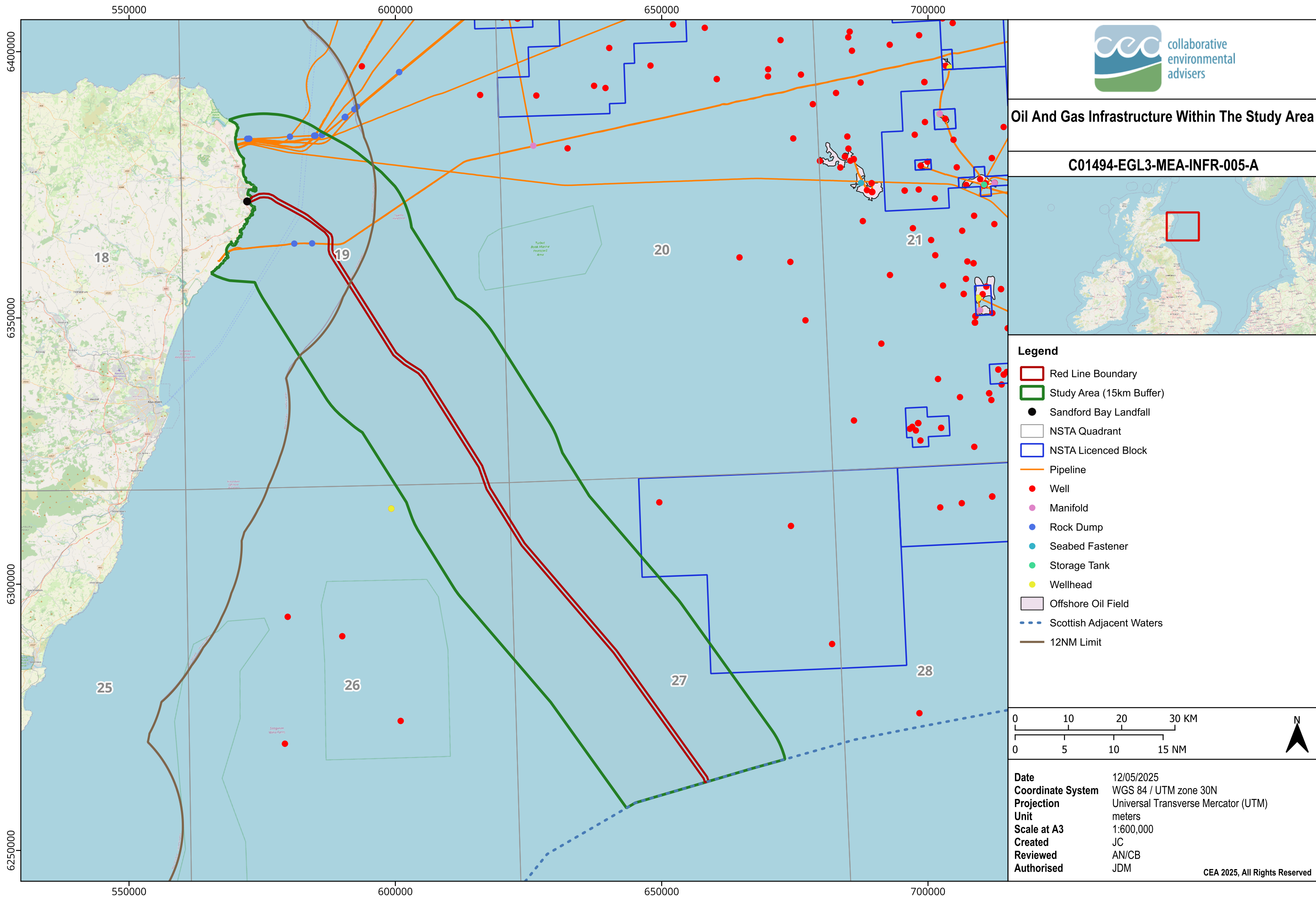
Legend

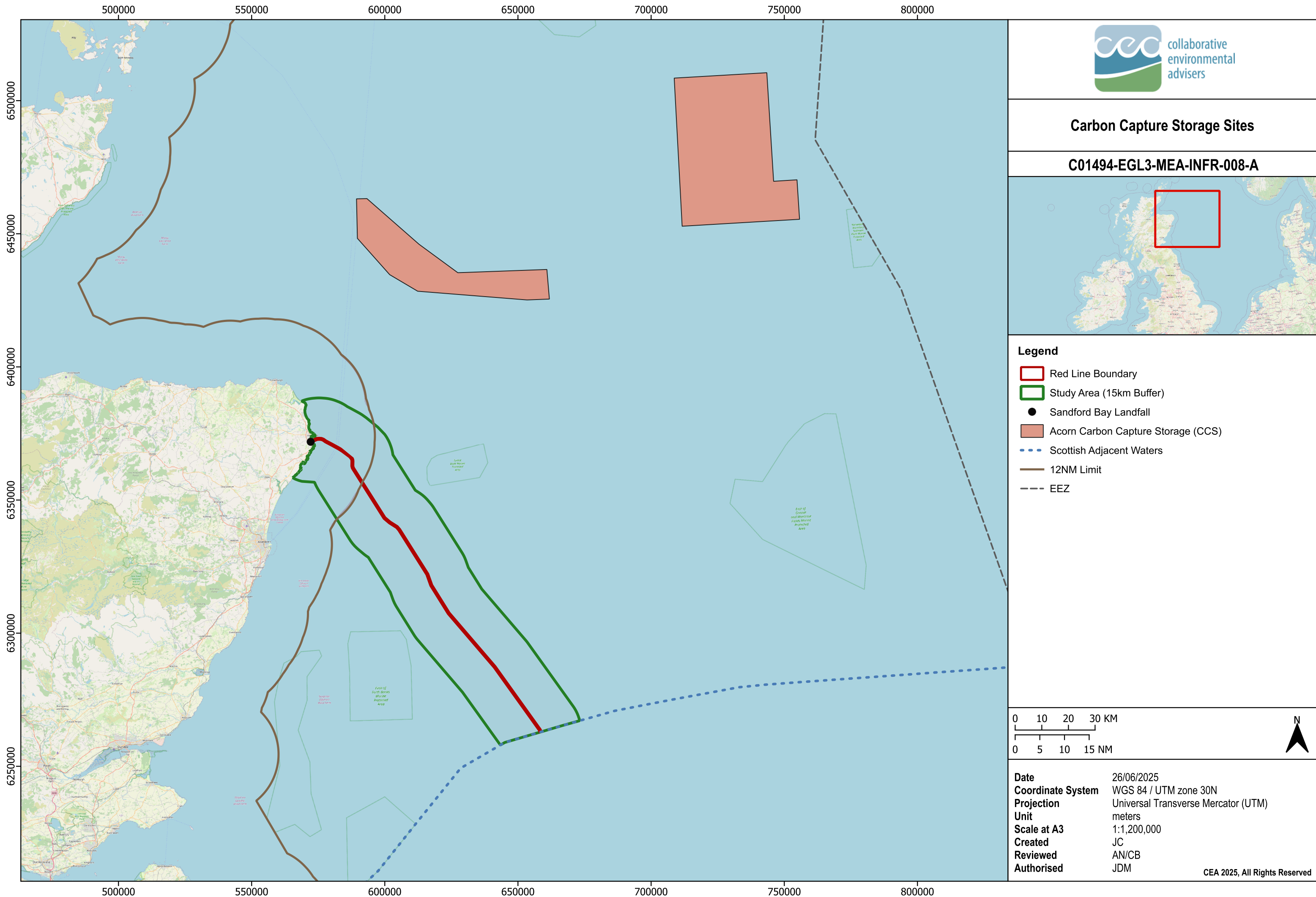
- Red Line Boundary
- Study Area (15km Buffer)
- Sandford Bay Landfall
- Disposal Sites (CEFAS)
- OWF Export Cable
- Power Cable
- Scottish Adjacent Waters
- 12NM Limit



Date	24/06/2025
Coordinate System	WGS 84 / UTM zone 30N
Projection	Universal Transverse Mercator (UTM)
Unit	meters
Scale at A3	1:600,000
Created	JC
Reviewed	AN/ CB
Authorised	JDM

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13.4.7. Recreational Activities

There are two designated 'bathing waters' close to the proposed landfall (**Figure 13-6 (Drawing reference C01494-EGL3-MEA-INFR-006-B)**). These are listed in **Table 13-8** and were classified as having a good or excellent bathing water status in 2022/23.

Table 13-7: Bathing waters within the Study Area (SEPA, 2023)

Bathing Water Name	Area	Year of Designation	Status (2022/2023)	Distance to the RLB
Cruden Bay	Aberdeen	1999	Good	11 km
Peterhead (Lido)	Peterhead	1999	Excellent	1.1 km

Scuba Diving

According to Divemap, there is evidence of some recreational diving within the Study Area, which is distributed around the Scottish coastline. **Figure 13-6 (Drawing reference C01494-EGL3-MEA-INFR-006-B)** also provides the location of local dive clubs.

Sailing and Cruising

The east coast of Scotland is also a popular area for sailing. There are two RYA sailing clubs within the Study Area (**Figure 13-6 (Drawing reference C01494-EGL3-MEA-INFR-006-B)**). The RYA Coastal Atlas (RYA, 2019) identifies the area as of low to medium use for recreational sailing, as shown in **Figure 13-6 (Drawing reference C01494-EGL3-MEA-INFR-006-B)**. Note that sailing/cruising activity displayed on this figure has been identified from automatic identification systems (AIS), though only about a quarter of recreational craft in these waters transmit an AIS signal. However, the tracks of those which do should be representative of all cruising recreational craft, except perhaps near the landfall sites due to the vessels there likely being small.

Water Sports

The east coast of Scotland has seasonal recreational water sports along its coastline including surfing, paddleboarding, canoeing, wind surfing, canyoning and coastal rowing.

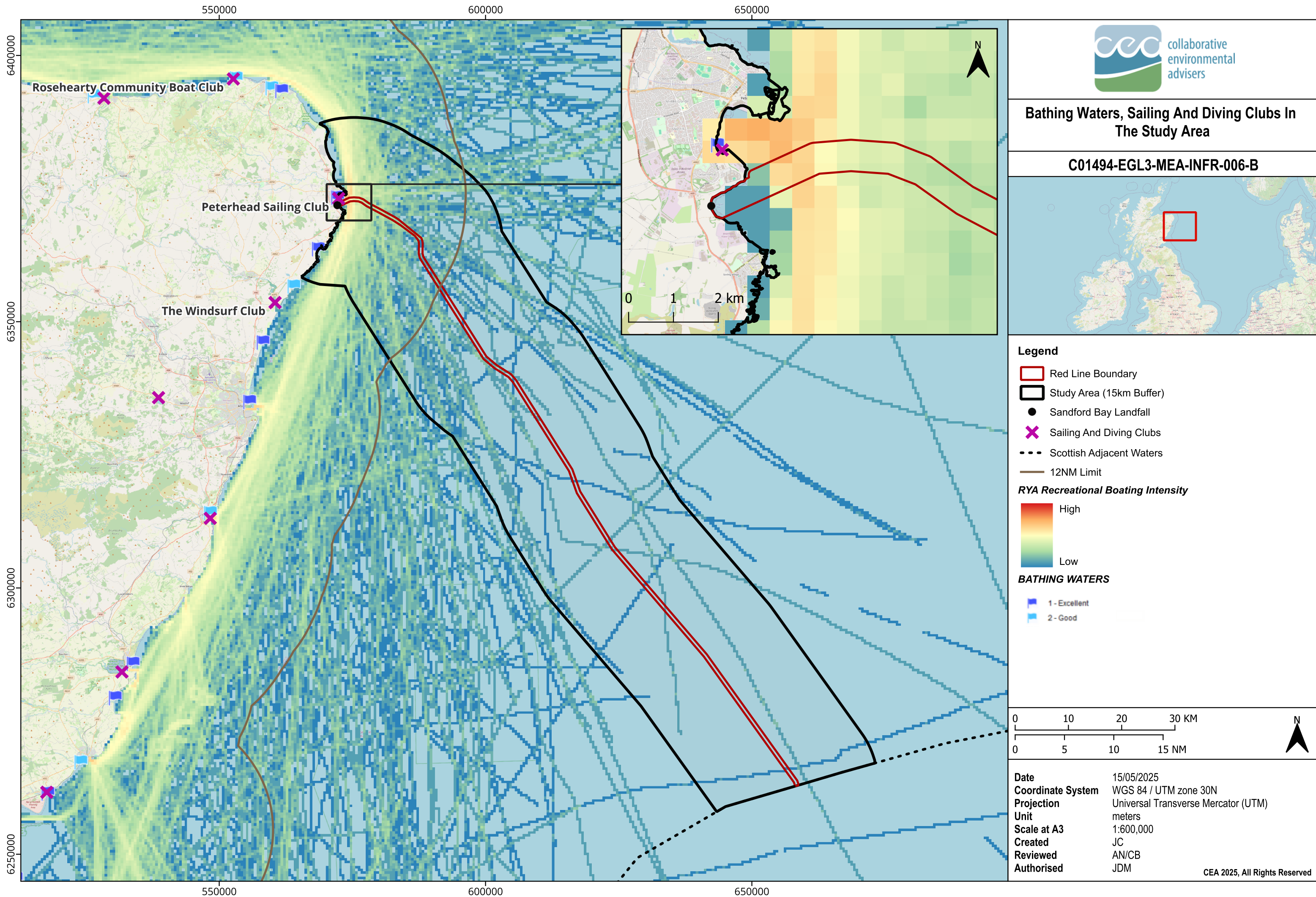
Angling

There are chartered fishing vessels on the east coast of Scotland who run fishing trips all year round. According to fishbrain.com, landed fish can include mackerel (*Scomber scombrus*) (when in season), European eel (*Anguilla anguilla*), whiting (*Merlangius merlangus*), pollock (*Pollachius virens*), and cod (*Gadus morhua*). More information on fishing can be found in **Chapter 12: Commercial Fisheries**.

13.4.8. Other Activities

A review of data sources identified that:

- There are no identified aggregate sites within the Study Area.
- There are no chemical weapon or munition disposal sites that lie within the Study Area. However, UXO munitions are frequently found in the North Sea.
- The Study Area does not intersect any MoD Practice Exercise Areas (PEXA).





13.5. Potential Pressure Identification and Zone of Influence

13.5.1. Spatial Scope

The Study Area for Other Marine Users includes the RLB plus an additional 15 km buffer on either side. This is consistent with **Chapter 6: Marine Physical Processes** and acts as a precautionary maximum Zol. The Zol incorporates the area within which there is potential for indirect impacts associated with the deposition of suspended sediments. This buffer also encompasses the 5 NM buffer either side of the RLB consistent with the shipping and navigation assessments (**Chapter 11: Shipping and Navigation**).

13.5.2. Temporal Scope

The temporal scope of the assessment of Other Marine Users is consistent with the period over which the Proposed Development would be carried out. It assumes construction of the Proposed Development would commence at the earliest in 2028 at with the latest possible completion by 2033. Within this window, construction (including pre-lay activity) is expected to take 55 months. Operation would commence in 2033 with periodical maintenance required during the operational phase. It is assumed that maintenance and repair activities could take place at any time during the life span of the Proposed Development.

The Proposed Development is expected to have a life span of more than 40 years. If decommissioning requires cessation of operation and removal of infrastructure at this point in time, then activities and effects associated with the decommissioning phase are expected to be of a similar level to those during the construction phase works albeit with a lesser duration of two years. Acknowledging the complexities of completing a detailed assessment for decommissioning works up to 40 years in the future, based on the information available, the Applicant has concluded that impacts from decommissioning would be no greater than those during the construction phase. Furthermore, should decommissioning take place it is expected that an assessment in accordance with the legislation and guidance at the time of decommissioning would be undertaken and a separate Marine Licence would be sought for decommissioning activities.

13.5.3. Identification of Pressure-Receptor Pathways

Table 13-8 provides a summary of the receptors scoped into the assessment and the potential impacts assessed. The scoping in of these impacts are based on the potential impacts identified within the MEA Non-Statutory Scoping Report. This took a precautionary approach whereby some impacts were scoped 'in' to the assessment if a strong evidence base to scope the impact 'out' was lacking.

Table 13-8: Other Marine Users receptors scoped in for assessment.

Potential impact	Activity	Project stage	Receptor	Zone of Influence	Justification
Interaction with other seabed infrastructure	Damage caused by anchored vessels and weaknesses in protection between crossing points, and changes to marine physical processes which may affect cable/pipeline stability/integrity.	Operation	Cables and pipelines	15 km	If the cable is installed correctly the likelihood of it requiring maintenance and repair is significantly reduced. However, there remains the potential that localised repair works, or remedial external cable protection may be required which potentially could affect any new or existing infrastructure. If this occurs discussions would take place with the cable owners ahead of works taking place and would be agreed through the Crossing Agreements.
Occupancy of seabed – Below seabed	Presence of cables	Operation	Oil and Gas, aggregates, power and telecom cables, OWFs and CCS.	15 km	The presence of the cables in the seabed may disrupt the placement of future infrastructure/offshore activities.



Potential impact	Activity	Project stage	Receptor	Zone of Influence	Justification
Occupancy of seabed – on seabed	External cable protection	Operation	Oil and Gas, aggregates, power and telecom cables, OWFs and CCS.	15 km	The presence of external cable protection may disrupt the placement of future infrastructure/offshore activities.

13.5.4. Guidance

The Other Marine Users assessment has been undertaken in accordance with relevant guidance and has been compiled in accordance with professional standards. The guidance and standards which relate to this assessment are:

- European Subsea Cable Association (ESCA) Guideline No. 6: The Proximity of Offshore Renewable Energy Installations & Submarine Cable Infrastructure in UK waters (ESCA, 2023)
- ESCA Guideline No.19. Marine Aggregate Extraction Proximity Guidelines (ESCA, 2016)
- International Cable Protection Committee (ICPC) Recommendation No.13-2C. The Proximity of Offshore Renewable Wind Energy Installations and Submarine Cable Infrastructure in National Waters (ICPC, 2024)
- ICPC Recommendation No.3-10C. Telecommunications Cable and Oil Pipeline/ Power Cables Crossing Criteria (ICPC, 2024)
- International Cable Protection Committee (ICPC) Recommendation No.2-12C. Recommended Routing and Coordinating Criteria for Submarine Telecommunications Cables in Proximity to Other Such Cables (ICPC, 2024)
- Scotland's National Marine Plan (Scottish Government, 2015)

13.6. Key Parameters for Assessment

13.6.1. Realistic Worst-Case Design Scenario

The assessment has followed the Rochdale Envelope approach as outlined **Chapter 3: Project Description**. The assessment of effects has been based on the description of the Proposed Development and parameters outlined in **Chapter 3: Project Description**. However, where there is uncertainty regarding a particular design parameter, the realistic worst-case design parameters are provided below with regards to Other Marine Users along with the reasons why these parameters are considered worst-case. The assessment for Other Marine Users has been undertaken on this basis. Effects of greater adverse significance are not likely to arise should any other development scenario (e.g., different infrastructure layout within the RLB), to that assessed here, be taken forward in the final design plan, provided the development scenario is within the Rochdale Envelope parameters set out.

In relation to Other Marine Users, the following assumptions are made regarding the Project design parameters to ensure a realistic worst-case assessment has been undertaken; these assumptions are based on expert judgement and precedent from applications of a similar nature and the activities that present the greatest opportunity for disruption to Other Marine Users.

Regarding activities that would temporarily interact or disrupt asset owners from accessing their assets, or recreational users from accessing recreational areas, the following assumptions present the greatest opportunity for interaction.

- 1 survey vessel will be deployed for a pre-construction survey
- 1 construction support vessel (CSV) will be deployed to undertake a pre-lay grapnel run (PLGR), during construction.
- 1 CSV will be deployed to undertake sand wave pre-sweeping, during construction.
- 1 CSV will be deployed to undertake boulder clearance, during construction.
- 1 CSV and 1 rock placement vessel will be deployed to undertake crossing preparation, during construction.
- 1 jack-up barge (JUB), 1 tug vessel, 1 crew transfer vessel, and 2 small workboats will be deployed for the landfall enabling works, during construction.
- 1 cable-lay vessel (CLV), 1 CSV, 2 tug/anchor handlers, 5 guard vessels, and 1 rock placement vessels will be deployed for the cable lay and burial, during construction.



13.7. Embedded Mitigation Measures

As set out in **Chapter 4: Marine Environmental Appraisal Scope and Methodology**, embedded mitigation measures form part of the design for which consent is sought and can be characterised as ‘design measures’ or ‘control and management measures.’ This embedded mitigation would be implemented as part of the Proposed Development and secured by way of condition in the Marine Licence as relevant.

Several management plans would be provided to discharge Marine Licence conditions prior to the start of construction. These would include a Construction Environmental Management Plan (CEMP), Marine Mammal Mitigation Plan (MMMP), a Marine Pollution Contingency Plan (MPCP) and a Fisheries Management and Mitigation Plan (FMMP). These documents will outline measures to be implemented to comply with legislation, such as Prevention of Pollution at Sea (MARPOL) and Safety of Life at Sea (SOLAS), and the mitigation commitments proposed within this MEAp (Embedded Mitigation OMT08). An Outline CEMP is provided as **Appendix 3B: Outline Construction Environmental Management Plan**. In addition, design measures identified through the MEAp process have been applied to avoid or reduce potential significant effects

Table 13-9 outlines the embedded mitigation measures that would be implemented for the Proposed Development that have been considered by the other marine users assessment.

Table 13-99: Embedded mitigation measures used for the Other Marine Users assessment

Receptor	Project Activities	Embedded mitigation measures
Recreational users	Construction and operation	OMT07 - As-built locations of cable and external protection will be supplied to UKHO (Admiralty), The Crown Estate Scotland and Kingfisher (KIS-ORCA)
Recreational users	Construction, operation, and decommissioning	OMT09 - All project vessels must comply with the International Regulations for Preventing Collisions at Sea (1972) (IMO, 2019a), regulations relating to International Convention for the Prevention of Pollution from Ships (the MARPOL Convention 73/78) (IMO, 2019e) with the aim of preventing and minimising pollution from ships and the International Convention for the Safety of Life at Sea (SOLAS, 1974).
Recreational users	Construction and operation	OMT04 - Cable protection features would only be installed where considered necessary for the safe operation of the Proposed Development. This includes the repair of cables due to accidental damage, where depth of lowering is not achieved and at infrastructure crossings.
Third Party Infrastructure	Construction and operation	OSU16 - Crossing and/or proximity agreements will be agreed with cable and pipeline owners. The crossing agreement describes the rights and responsibilities of the parties and the design of the crossing. Crossing design will be in line with industry standards, using procedures and techniques agreed with the cable and pipeline owners.
Recreational users	Construction, operation, and decommissioning	OSU02 - Timely and efficient communication will be given to sea users in the area via Notices to Mariners (NtM), Kingfisher Bulletins, Radio Navigation Warnings Navigational Telex (NAVTEX and Navigational Areas (NAVAREA) warnings and /or broadcast warnings.
Recreational users	Construction	OMT03 - The intention is to bury the cables in the seabed, except in areas where burial is not possible e.g. where ground conditions do not allow burial or at infrastructure crossings.
Recreational users	Construction	OSU14 - All vessels associated with the Proposed Development would display appropriate marks and lights and would always broadcast their status on Automatic Identification System (AIS) if appropriate.
Recreational users	Construction	OSU17 - Client Representation from, or on behalf of the Applicant, onboard Project vessels ensuring compliance with crossing design and communications with Asset Owners.
Third Party Infrastructure	Construction	OSU18 - UXO survey and removal and /or charting of confirmed UXO targets highlighting known risks to Other Marine Users.

13.8. Significance Assessment

The generic project-wide approach to the assessment methodology is set out in **Chapter 4: Marine Environmental Appraisal Scope and Methodology**. However, whilst this has informed the approach that has been used in this Other Marine Users assessment, it is necessary to set out how this methodology has been applied, and adapted as appropriate, to address the specific needs of this Other Marine Users assessment. Details are provided below.



The criteria for characterising the sensitivity and magnitude for Other Marine Users are outlined in **Table 13-10** and **Table 13-11**, respectively. Once sensitivity and magnitude have been defined these are combined according to the significance matrix provided in **Table 13-12**.

The assessment of sensitivity has been made with consideration of the vulnerability of the receptor to an impact and its ability to adapt and accommodate the change. Vulnerability can differ between different receptor groups and will also vary depending on the impact pathway. The assessment of magnitude has been made with consideration of the extent of the area impacted and the duration and frequency of the impact.

The impact assessment for the purposes of this MEA has used available evidence, professional judgement and knowledge of Other Marine Users to determine the level of impact.

Table 13-1010: Definitions of sensitivity for Other Marine Users

Receptor sensitivity	Description
High	Receptor is economically valuable and/or has low/no capacity to return to pre-impact conditions, e.g., low tolerance to change and low recoverability such as loss of access with no alternatives or the impact will have major financial consequences for the receptor
Medium	Receptor is of intermediate economic value and/or is tolerant to change e.g., acceptable alternatives with minor financial consequences.
Low	May affect behaviour but is not a nuisance to user, with acceptable financial consequences e.g., short-term, reversible changes.
Negligible	The receptor is tolerant to change with no effect on its character.

Table 13-1111: Definitions of impact magnitude criteria for Other Marine Users

Impact Magnitude	Definition
High	Total loss of, or major alteration to key elements or features of the pre-project conditions, such that the post-project character or composition of the feature would be fundamentally changed.
Medium	Loss of or alteration to key elements or features of the pre-project conditions, such that the post-project character of the feature would be partially changed.
Low	Minor alteration from pre-project conditions
Negligible	No or unquantifiable change to pre-project conditions.

Table 13-1212: Significance matrix

		Sensitivity			
		High	Medium	Low	Negligible
Adverse magnitude	High	Major	Major	Moderate	Minor
	Medium	Major	Moderate	Minor	Minor
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Minor	Minor	Negligible	Negligible
Beneficial magnitude	Negligible	Minor	Minor	Negligible	Negligible
	Low	Moderate	Minor	Negligible	Negligible
	Medium	Major	Moderate	Minor	Negligible
	High	Major	Major	Moderate	Minor



13.8.1. Interaction with Other Seabed Infrastructure – All phases

Other Marine Users (cables and pipelines) could be affected by:

- Damage to cables and pipelines because of disturbance to the seabed, such as damage caused by, for example, anchored vessels, and weaknesses in protection measures between crossing points;
- Changes to marine physical processes affecting the stability or integrity of cables and pipelines (operation only); or
- Restriction of cable and pipeline maintenance activity (operation only).

Installation and repair work may involve the use of jack-up vessels or anchored vessels that have the potential to cause damage to third party cables or pipelines. As subsea cables and pipelines are of international importance given they contribute to our security of energy supply, damage could have large financial and social implications and cause long term disruption to services and energy supply. As part of the embedded mitigation, pre-works surveys would be undertaken to locate all existing infrastructure, and following analysis of this information, appropriate plans would be put in place to avoid or to cross existing subsea cables or pipelines with the use of external cable protection. Individual crossing agreements would be set up with cable and pipeline owners following guidance from the ICPC and ESCA. If new infrastructure is identified crossing agreements would need to be reached between the parties ahead of works taking place. Considering the embedded mitigation, the **sensitivity** of the receptor has been assessed as **high**, the **magnitude** of impact has been assessed as **negligible** as appropriate safeguarding procedures would be in place to ensure assets are not damaged. Therefore, the **significance** of effect has been assessed as **Minor and Not Significant**.

There is the potential for scour to occur local to the cable protection laid to support crossing of third-party infrastructure, affecting the integrity of the third-party infrastructure over which the Proposed Development is laid. The scour assessments conducted as part of **Chapter 6: Marine Physical Processes** indicates that scour is not expected beyond the immediate vicinity of the cables or cable crossings and would be minor and therefore would not be affected by stability or integrity issues. Furthermore, the design of the crossings would take account of any potential for scour. The **sensitivity** of the receptor has been assessed as **high**, the **magnitude** of impact has been assessed as **negligible** as it is predicted the receptors are tolerable to any minor changes. Therefore, the **significance** of effect has been assessed as **Minor and Not Significant**.

There is the potential for the physical presence of associated infrastructure to restrict third party cable and pipeline maintenance activity. Cable routing and design has sought to minimise and avoid interaction with third party cables and pipelines, except for crossing points. Crossing Agreements would be agreed with asset owners with provisions for access during periods of maintenance. Given the infrequency of required maintenance visits / surveys and that cable repairs are likely to be minimal during the operational life of the cables, the **magnitude** of effect has been assessed **negligible**. Combined with the **high sensitivity** of the receptor, the **significance** of the effect has been assessed as **Minor and Not Significant**.

13.8.2. Occupancy of Seabed – Below Seabed – Operation and Maintenance

During operation the presence of the cables may restrict the future use of the seabed by Other Marine Users. In consideration of the future baseline all projects currently in planning have been taken into consideration within the design of the Proposed Development, i.e., cable separation distance maintained, and infrastructure crossings are according to guidelines. It is likely that new projects would arise within the Study Area beyond those which are currently noted. It would be the onus of the third party developers to take the Proposed Development into consideration as part of their consideration of options and design. Engagement would be undertaken with owners and operators of assets to ensure all future developments can coexist.

The Applicant is seeking consent for the area required for installation of cables and would engage with future developers to agree Crossing Agreements for their assets as appropriate and in line with relevant legislation and guidance.

The **sensitivity** and **magnitude** for these receptors has been assessed as **low** and the **significance** of the effect has been assessed as **Minor and Not Significant**; there would be a change to pre-project conditions, however future developments can continue with appropriate agreements in place.

13.8.3. Occupancy of Seabed – On Seabed – Operation and Maintenance

During operation the presence of external cable protection (such as rock protection) may disrupt the placement of future infrastructure/offshore activities.

In consideration of the future baseline all projects currently in planning have been taken into consideration within the design of the Proposed Development, i.e., cable separation distance maintained, and infrastructure crossings are according to guidelines. It is likely that new projects would arise within the Study Area beyond those which are currently noted. It would be the onus of the third-party developers to take the Proposed Development into consideration as part of their consideration of options and design. Engagement would continue with owners and operators of assets to ensure all future developments can coexist.



The Applicant is seeking consent for the minimum area required and would only place cable protection where required. Note, the aim of the Proposed Development is to bury the cables beneath the seabed during installation. However, there may be areas in which the cable cannot be buried or cannot be buried to target depth due to the type of substrate on the seabed. In these instances, the installation of cable protection would be required to ensure that the asset is protected from accidental or deliberate damage, for example due to anchor snagging. Cable protection would be likely to take the form of a rock berm or rock bags, with the exact methodology to be determined prior to installation. The maximum width of external cable protection is 10 m, with a maximum area of 0.135 km² of seabed covered by cable protection including infrastructure crossings.

The **sensitivity** and **magnitude** for these receptors has been assessed as **low** and the **significance** of the effect is assessed as **Minor and Not Significant**; there would be a change to pre-project conditions, however future developments can continue with appropriate agreements in place.

In line with the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, all future developments would be subject to their own environmental assessments. In addition, there is a requirement to seek Crossing Agreements, as appropriate. The Crossing Agreements would ensure the ability of a cable/pipeline operator to access their cable/pipeline throughout all phases of the Proposed Development, which would involve close communication and planning between parties to minimise potential disruption.

13.9. Project Specific Mitigation Measures

The assessment of the impacts of the Proposed Development on other marine user receptors identified effects not exceeding 'minor' significance for the construction, operation and maintenance and decommissioning phases. No project specific mitigation has been proposed.

13.10. Residual Effect

The appraisal of the impacts of the Proposed Development on other marine user receptors identified no significant adverse effects. No residual effects are predicted.

13.11. Cumulative Effects

If the construction or decommissioning of other plans and projects have a temporal overlap with the construction of the Proposed Development, there is potential for cumulative adverse effects on Other Marine Users greater than that caused solely by the Proposed Development. As outlined by **Chapter 4: Marine Environmental Appraisal Scope and Methodology**, a four-stage approach has been undertaken to assess the cumulative adverse effects from other plans and projects in-combination with the construction of the Proposed Development.

13.11.1. Stage 1: Identification of ZOI

Section 13.5 justified a ZOI of 15 km for Other Marine Users, for consistency with **Chapter 6 Marine Physical Processes** and **Chapter 11: Shipping and Navigation**, which acts as a precautionary maximum ZOI. The ZOI incorporates the area within which there is potential for indirect impacts associated with the deposition of suspended sediments, and is also specific to interaction with other seabed users, and occupancy of seabed (above, and on the seabed). All plans and projects within the ZOI are assessed in-combination with the Proposed Development to determine if there would be any significant cumulative adverse effects to Other Marine Users (**Section 13.11.4**).

13.11.2. Stage 2: Shortlist Of Plans and Projects Relevant to Other Marine Users

Chapter 4: Marine Environmental Appraisal Scope and Methodology outlines a longlist of plans and projects within 30 km of the Proposed Development. From this longlist, nine plans/projects within 15 km of the Proposed Development have been shortlisted to inform the cumulative effects assessment for Other Marine Users (**Table 13-13**), based on the maximum ZOI used in the alone assessments (**Table 13-8**). Infrastructure within this ZOI that is already operational has been scoped out, since the effects of the maintenance of operational projects has influenced the baseline assessment.

Table 13-1313: Shortlist of projects

Application Reference	Plan or project	Type of project	Distance from RLB	Status
SCOP-0056	Bowdun OWF	OWF	5.78 km	Pre Application - Scoping Report
00011026	Muir Mhor OWF	OWF	~3 km	Application – EIA submitted



Application Reference	Plan or project	Type of project	Distance from RLB	Status
00010861	Ossian Floating OWF	OWF	2.66 km	Application – EIA submitted
00010344	Morven OWF	OWF	1.98 km	Pre Application - Scoping Report
06771 & 06870	NorthConnect	Cable	0 km / crosses	Licence expired (cable have has been taken on by Cenoss offshore wind farm as detailed below)
00011091	Cenoss Floating OWF – transmission infrastructure	OWF	0 km/crosses	Application – EIA submitted
SCOP-0066	Aspen Floating OWF – transmission infrastructure	OWF	0 km/crosses	Pre-application – Scoping Report
SCOP-0020	MarramWind OWF	OWF	0 km/crosses	Pre Application – Scoping Report
00009943	Eastern Green Link 2 (EGL 2)	Cable	0 km/crosses	Licence granted

13.11.3. Stage 3: Information Gathering and Identification of Pressure-Receptor Pathways

Construction of the Proposed Development is scheduled to commence in 2028 with the latest possible completion by 2033. Within this window, construction (including pre-lay activity) is expected to take 55 months.

NorthConnect was planned to cross the Proposed Development at approximately KP 576. However, construction of NorthConnect has been placed on hold by the Norwegian Government, and the current Marine Licence for this project has expired (expiration date 2024) (NorthConnect, 2025). It is understood that the Cenoss OWF has taken on the planned cable route from NorthConnect and a new licence application has been submitted. NorthConnect is therefore not considered further, however Cenoss OWF is detailed further below and taken forward for assessment.

Bowdun OWF is situated approximately 5.57 km from the Proposed Development and is due to commence construction in 2029, with commercial operation scheduled to begin in 2032-2033. There may therefore be a small window of overlap in the construction of the Proposed Development and Bowdun OWF.

The export cable corridor of Miur Mhòr OWF is situated approximately 3 km from the RLB of the Proposed Development. Miur Mhòr OWF is currently in its application phase, having submitted EIA in December 2024 (application reference number: 00011026) (Scottish Government, 2024), and is scheduled to commence construction in 2030, with construction activities lasting up to four years (MMOWF Ltd, 2024). As such, there may be a direct temporal overlap in construction between the two projects and potential for cumulative adverse effects from interaction with other seabed infrastructure, occupancy of seabed (below seabed) and occupancy of seabed (on seabed).

MarramWind OWF is currently in pre-application, having submitted the Scoping Report in January 2023 (application reference number: SCOP-0020) (Scottish Government, 2023). Construction is scheduled to begin in the late 2020s, following planning decisions in 2026, and MarramWind OWF is scheduled to be operational in the 2030s. Therefore, there may be a direct temporal overlap in construction between the two projects. The scoping boundary of MarramWind OWF overlaps with the RLB of the Proposed Development at Peterhead nearshore. However, due to the application stage of MarramWind OWF, there is no EIA available for this project and its project-alone impact to Other Marine Users receptors is unknown. Therefore, MarramWind OWF cannot be assessed in-combination with the Proposed Development and will not be taken forward to stage 4 of the cumulative effects assessment.

Ossian Floating OWF is situated approximately 2.66 km from the Proposed Development and is anticipated to commence construction in 2031. There may therefore be a window of overlap in the construction of the Proposed Development and Ossian.

Morven OWF is situated approximately 1.98 km from the Proposed Development and is due to commence construction in 2027, with commercial operation scheduled to begin in 2030 (Power Technology, 2024). Thus, there would be a direct temporal overlap in construction between the two projects.

Cenoss Floating OWF's transmission crosses the Proposed Development. It is currently in its permitting phase (EIA reports have been submitted) and it is anticipated to begin construction from 2030, with operation in 2031. As such, there may be a direct temporal overlap in construction between the two projects.



Aspen Floating OWF's transmission crosses the Proposed Development and is currently in its pre-application phase. It is anticipated that construction may begin in 2028, with operation in 2029/2030. As such, there may be a direct temporal overlap in construction between the two projects.

The construction of EGL 2 is currently underway, with cable operation scheduled for 2029 (Eastern Green Link 2, 2025). Additionally, EGL 2 and the Proposed Development share the same landfall at Sandford Bay, Peterhead. Therefore, it is expected that there would be a temporal overlap in construction with the Proposed Development for one year. The Marine Licence application for EGL 2 has been submitted and can be viewed using the marine.gov.scot website (application reference number: 00009943) (Scottish Government, 2025).

13.11.4. Stage 4: Assessment

13.11.4.1. Interaction with other seabed infrastructure

This MEAp concludes in **Section 13.9** that there are no significant adverse effects of interaction with other seabed infrastructure,

An EIA has not yet been published for Morven OWF, Bowdun OWF, or Aspen Floating OWF; thus, a project alone significance assessment is not available to inform this cumulative effect assessment. For these wind farms to be consented, the projects would need to mitigate any significant adverse impacts that may arise from their development and, due to the scale of footprint of these wind farms compared to the Proposed Development, the impact would be significantly larger than that of the Proposed Development.

Ossian Floating OWF is scheduled for a 35-year operation and maintenance duration, with 500 m safety zones around infrastructure during periods of major maintenance. It is further anticipated that up to 5 % of cables may be repaired annually, with reburial of up to 5 % of cables annually and a maximum of 27 inter-array cable ancillary equipment repair instances each year. Cable protection may need replacing twice over the lifetime of the wind farm, and interconnector cables would occur once every five years. During operation, this impact was assessed as having a minor adverse significance, which is not significant.

Cenos Floating OWF is to be operational for 35 years, with 500 m safety zones around infrastructure during periods of major maintenance. The transmission infrastructure would consist of either one offshore substation and converter platform (OSCP) fully integrated to provide HVDC power transmission and HVAC power distribution, or two OSCP's to provide HVDC power transmission and HVAC power distribution. The latter scenario would include two OSCP jackets positioned adjacently at the same location, with a 50 m minimum spacing between jackets. There is no anticipated interaction between the offshore wind farm infrastructure and the Proposed Development as the latter is anticipated to interact and cross the export cable only. Cable burial depth is anticipated to be 0.4 m minimum (target of 1 m), with a maximum depth of 1.5 m. During operation, this impact was assessed as having a negligible significance, which is not significant.

The EGL 2 cable system is anticipated to have minimal need for scheduled maintenance (AECOM, 2022), with no routine maintenance planned for the cables/associated infrastructure over the project's lifetime. If repairs are necessary, safety zones would be implemented (a 500 m safety zone around vessels). The EGL 2 project assessed effects from disruption to Other Marine Users and offshore infrastructure, and damage to interference with a third-party asset as being not significant.

The cumulative effect of interaction with other seabed infrastructure is therefore has been assessed as **Minor and Not Significant**.

13.11.4.2. Occupancy of seabed – below seabed

This MEAp concludes in **Section 13.8.2** that there are no significant adverse effects of occupancy of seabed (below the seabed).

As mentioned in **Section 13.11.4.1**, there is currently no EIA for Morven OWF, or Bowdun OWF and therefore, a project alone significance assessment is not available to inform this cumulative effect assessment.

Ossian Floating OWF proposes installation of up to 265 floating wind turbines, which would require up to 12 cable crossings of 1,261km of inter-array cabling and up to 236km of interconnector cabling. During operation, this impact was assessed as having a minor adverse significance, which is not significant.

Cenos Floating OWF's parameters are detailed in **13.11.4.1** and are assessed as not significant.

The EGL 2 parameters are detailed in **Section 13.11.4.1**. The EGL 2 project assessed occupancy of seabed as being not significant.

The cumulative effect of occupancy of seabed (below the seabed) is therefore has been assessed as **Minor and Not Significant**.

13.11.4.3. Occupancy of seabed – on seabed

Section 13.8.3 of this MEAp concludes that there are no significant adverse effects of occupancy of seabed (on the seabed).

As mentioned in **Section 13.11.4.1**, there is currently no EIA for Morven OWF, or Bowdun OWF and therefore, a project alone significance assessment is not available to inform this cumulative effect assessment.

Ossian Floating OWF parameters are given in **Section 13.11.4.2**. During operation, this impact was assessed as having a minor adverse significance, which is not significant.



Cenos OWF's parameters are detailed in **13.11.4.1** and are assessed as not significant.

The EGL 2 parameters are detailed in **Section 13.11.4.1**. The EGL 2 project assessed occupancy of seabed as being not significant.

The cumulative effect of occupancy of seabed (on the seabed) is therefore has been assessed as **Minor** and **Not Significant**.

13.11.4.4. Stage 4 assessment conclusion

Cumulative effects have been assessed for interaction with other seabed infrastructure, occupancy of seabed (below seabed), and occupancy of seabed (on seabed), for projects Bowdun OWF, Muir Mhór OWF, Ossian Floating OWF, Morven OWF, NorthConnect, Cenoss Floating OWF, Aspen Floating OWF, MarramWind OWF, and EGL 2. In all cases, no cumulative effects were concluded.



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