Eastern Green Link 3

Marine Environmental Appraisal

Chapter 15 - Schedule of Mitigation

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

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Abbreviations/Glossary

AIS	Automatic Identification System
ALDFG	Abandoned, lost or discarded fishing gear
AEZ	Archaeological Exclusion Zone
ARPA	Automatic RADAR Plotting Aid
CBRA	Cable Burial Risk Assessment
CEMP	Construction Environmental Management Plan
COLREGs	International Regulations for Preventing Collisions at Sea
EMF	Electromagnetic Field
FLO	Fisheries Liaison Officer
FMMP	Fisheries Mitigation and Monitoring Plan
HDD	Horizontal Directional Drilling
HVDC	High Voltage Direct Current
M	Metre
MARPOL	International Convention for the Prevention of Pollution from Ships
MEAp	Marine Environmental Appraisal
NAVAREA	Navigational Areas
NAVTEX	Navigation Warnings Navigational Telex
NM	Nautical Miles
NtM	Notices to Mariners
PAD	Protocol for Archaeological Discoveries
RLB	Red Line Boundary
ROV	Remotely Operated Vehicle
SIMOPs	Simultaneous Operations
SOLAS	Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plan
SPA	Special Protection Area
TAEZs	Temporary Archaeological Exclusion Zone
UXO	Unexploded Ordnance
VTS	Vessel Traffic Services
WSI	Written Scheme of Investigation

15. Schedule of Mitigation

The Proposed Development includes embedded mitigation, measures which have been built-into or embedded into the design to avoid or reduce the likelihood of significant adverse effects occurring or that are to ensure legislative compliance. All embedded mitigation measures are treated as baseline conditions for the Proposed Development and were included within the Marine Environmental Assessment.

Project-specific mitigation measures have been proposed in the Marine Environmental Appraisal (MEAp) topic chapters to respond to the assessment outcome as needed to minimise adverse significance effects. Project specific mitigation measures were considered alongside the embedded mitigation to determine the residual effect significance.

Embedded mitigation measures and project specific mitigation measures are presented across the topic Chapters of the MEAp as relevant and are summarised in **Table 15-1** and **Table 15-2** respectively.

Table 15-1: Schedule of embedded mitigation measures

ID	Embedded Mitigation Measures
Overarching Commitments	
OMT01	Intertidal zone would be crossed by Horizontal Directional Drilling (HDD) to avoid disturbance to surface sediments and habitats.
OMT02	Drilling fluids required for trenchless operations will be carefully managed to minimise the risk of breakouts into the marine environment. Specific avoidance measures would include: ▪ the use of biodegradable drilling fluids (pose little or no risk substances) where practicable, ▪ drilling fluids will be tested for contamination to determine possible reuse or disposal; ▪ if disposal is required drilling fluids would be transported by a licensed courier to a licensed waste disposal site. ▪ Chemicals will be chosen from the list of chemicals approved under the Offshore Chemical Notification Scheme. https://www.cefas.co.uk/data-and-publications/ocns/ and a chemical risk assessment will be provided as part of the Construction Environmental Management Plan (CEMP)
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.
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.
OMT05	Where possible, cable protection materials will be selected to match the environment (e.g., when cables are installed in areas of cobbles or other natural rock features, rock of similar diameter and material as the receiving environment should be used).
OMT06	High Voltage Direct Current (HDVC) poles will be bundled to minimise the effects of Electromagnetic Fields (EMF) for electrosensitive receptors.
OMT07	As-built locations of cable and external protection will be supplied to UKHO (Admiralty), The Crown Estate Scotland and Kingfisher (KIS-ORCA).
OMT08	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 Pollution Contingency Plan (MPCP), Marine Mammal Mitigation Plan (MMMP) and a Fisheries Management and Mitigation Plan (FMMP). These documents will outline measure to be implemented to comply with legislation, such as the International Convention for the Prevention of Pollution from Ships (MARPOL) and the Safety of Life at Sea (SOLAS) convention, and the mitigation commitments proposed within this MEAp.
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).
OMT10	Designated (and as minimal as possible) anchoring areas and protocols shall be employed during marine operations to minimise physical disturbance of the seabed
OMT11	Project vessels will follow all relevant guidelines with respect to avoiding the introduction of and minimising the spread of marine invasive non-native species (GB Non-native Species Secretariat, 2015). This includes using vessel cleaning facilities and the use of anti-fouling paint. Project vessels and contractors will comply with the International Convention for the Control and Management of Ships' Ballast water and sediments. All seabed deposits will be inert with no biologically active material. Project vessels will complete a biosecurity risk assessment prior to arriving on site which will include factors such as origins of the vessels and ensuring that relevant equipment is cleaned before use.

ID	Embedded Mitigation Measures
Marine Physical Processes	
MPP01	Detailed route development and micro-routeing will be undertaken within the Red Line Boundary (RLB), informed by pre-construction data evaluation to avoid or minimise localised engineering and environmental constraints.
MPP02	The Applicant will liaise with SEPA to communicate and agree timings of works at the Sandford Bay landfall.
MPP03	Where feasible, sediment displaced for HDD exit pits and cable installation (sandwave clearance and trenching) will be locally placed and used to backfill (either manually or naturally).
Intertidal and Offshore Ornithology	
OO01	Existing shipping lanes would be utilised for vessel transiting routes to avoid additional disturbance to seabirds, where practicable.
OO02	Vessel operators will be made aware of the importance and sensitivity of relevant species to disturbance. Vessels will avoid rafting birds and areas with high densities of birds, where practicable.
OO03	Artificial lighting on vessels will be directional and only used when necessary, noting that health and safety requirements will need to be met for safe working practices.
OO04	All vessels used during the course of the Licensed Activity will adhere to the Scottish Marine Wildlife Watching Code.
Marine Mammals and Marine Reptiles	
MM01	Sub-bottom profiling shall comply with JNCC guidelines for minimising the risk of injury and disturbance to marine mammals (JNCC, 2017b)
MM02	All vessels (exceeding 20 m) shall not exceed 14 knots during construction operations within the RLB to protect marine mammals from ship strikes.
Shipping and Navigation & Other Marine Users	
OSU01	For safety purposes, all vessels will be requested to maintain a minimum distance from construction vessels to prevent interactions.
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.
OSU03	Procedures will be in place to minimise disruption near high density shipping areas. e.g. avoidance of anchoring near busy areas, passage planning of installation vessels, emergency response plan etc.
OSU04	Channels of communication will be established and maintained between the Applicant, commercial fishing interests and relevant Port Authorities.
OSU05	Communication with Vessel Traffic Services (VTS) in port areas to keep updated and update other marine users on vessel movements.
OSU06	Coordination of Simultaneous Operations (SIMOPs) with other developers and marine activities to be undertaken prior to commencement of operations.
OSU07	Project vessels will comply with the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs) as amended, particularly with respect to the display of lights, shapes and signals. The masters of other vessels are expected to be familiar with and comply with the COLREGS.
OSU08	Pilotage within Port Authority Limits as required by the Port Authority.
OSU09	Pollution events as the result of a collision will be managed through the Project Emergency Response Plan, Marine Pollution Contingency Plan and specifically the Shipboard Oil Pollution Emergency Plan (SOPEP).

ID	Embedded Mitigation Measures
OSU10	Guard vessel(s), using RADAR with Automatic RADAR Plotting Aid (ARPA) to monitor vessel activity and predict possible interactions, will be employed to work alongside the installation vessel(s) during cable installation works and to protect any temporary cable exposures during construction.
OSU11	Cable jointing operations to be planned away from high shipping activity where possible.
OSU12	Cable Burial Risk Assessment (CBRA) to be undertaken to identify appropriate target depth of burial based on geology, water depths and AIS data. This will reduce the chance of interaction with other marine users, and as per the CBRA recommendations deeper burial or cover will be implemented in areas of high shipping activity to further reduce this risk.
OSU13	Designated adverse weather shelter areas (would recommend to be further than 500 m from construction) - to be determined with the contractor.
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.
OSU15	Cables will be marked on Admiralty Charts and fisherman's awareness charts (paper and electronic format).
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.
OSU17	Client Representation from, or on behalf of the Applicant, onboard Project vessels ensuring compliance with crossing design and communications with Asset Owners.
OSU18	UXO survey and removal and /or charting of confirmed Unexploded Ordinance (UXO) targets highlighting known risks to other marine users.
Commercial Fisheries	
CF01	A Fisheries Liaison Officer (FLO) and fisheries working group(s) will be maintained throughout construction to ensure project information is effectively disseminated, dialogue is maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season. Details of the FLO will be included in the Fisheries Management and Mitigation Plan (FMMP).
CF02	Timings of any temporary areas of exclusion from fishing grounds will be clearly communicated via a Notice to Mariners (NtM).
CF03	Cable protection would be designed to prevent the risk of fishing gear snagging.
CF04	A procedure for the claim of loss of/or damage to fishing gear will be developed and details included in the FMMP.
CF05	During cable route clearance, specific activities would be completed to remove items from the seabed. Out of Service cables would be removed as per industry guidelines, larger debris including lost fishing gear would be removed prior to cable installation and a pre-lay grapnel run would be completed to ensure smaller debris is removed. If abandoned, lost or discarded fishing gear ('ALDFG') is encountered, it may be necessary in certain circumstances to bring ALDFG onto the vessel deck. In these instances, marked ALDFG will be returned to shore for onward retrieval by the owner of the marked gear, in line with existing best practice. Not all gear (particularly 'active' gear) is marked; if necessary to bring onto the vessel deck, unmarked gear will be disposed of via conventional onshore waste channels.
CF06	Cut cable end locations and associated weights shall be accurately noted and charted and positions given to the FLO at the earliest opportunity for onward communication to the fishing industry.
CF07	If cable exposures are identified during routine surveys, the location of these will be shared with fisheries stakeholders and where necessary, additional temporary measures put in place (e.g., marker buoys, use of guard vessels, etc), until a repair or remediation can be implemented.

ID	Embedded Mitigation Measures
Marine Archaeology	
MA01	Archaeological Exclusion Zones (AEZs) and Temporary Archaeological Exclusion Zones (TAEZs) will be implemented around identified (known) and potential marine archaeological receptors. The extent of exclusion zones will be determined by the potential significance of the receptor, the seabed dynamics, the potential impacts and extent of any outlying debris. The AEZs will be agreed with the Archaeological Curator and will remain for the lifetime for the Proposed Development or an until further works are undertaken to allow re-assessment.
MA02	The Proposed Development will retain the services of an archaeological consultant, the 'Retained Archaeologist', to implement the Written Scheme of Investigation (WSI). The Retained Archaeologist will provide guidance as to the requirements for archaeological assessment of further pre-construction surveys and the specifications of such surveys. This can include, but is not limited to, geophysical, hydrographic, Remotely Operated Vehicle (ROV), diver and geotechnical surveys. The Retained Archaeologist will provide input into site preparation, pre-construction and construction activities where appropriate and where archaeological monitoring of such works may be required.
MA03	The archaeological assessment of geotechnical samples will be undertaken as necessary, informed by the interpretated potential of the marine archaeology Study Area. The archaeological assessment of geotechnical samples will be preceded by a Method Statement and will follow a staged process after *Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector* (Gribble and Leather, 2011).
MA04	The Protocol for Archaeological Discoveries (PAD) will follow best practice outlined in *Protocol for Archaeological Discoveries: Offshore Renewables Projects* (The Crown Estate, 2014). The PAD provides the mechanism for the reporting of unexpected finds of potential archaeological interest, and the subsequent treatment of such finds. The PAD does not replace archaeological processes but enhances the protection for the historic environment. The PAD also provides additional mitigation for geophysical anomalies interpreted as of low archaeological potential.
MA05	The WSI will follow the best practise as outlined in *Archaeological Written Schemes of Investigation for Offshore Windfarm Projects* (The Crown Estate, 2021). The WSI will: ▪ Set out the roles and respective responsibilities of the Applicant, Contractors and Retained Archaeologist and Archaeological Contractor(s). ▪ Outline the known and potential archaeological receptors that could be impacted by the Project. ▪ Set out the importance of research frameworks in setting objectives that may be delivered through realisation of the known and potential archaeology. ▪ Outline the agreed mitigation and archaeological actions that are to take place in various circumstances; and ▪ Provide methodologies for these archaeological actions, to be employed on archaeological work conducted in the post-consent period.

Table 15-2: Schedule of project specific mitigation measures for the Proposed Development

ID	Project Specific Mitigation Measures
Ornithology	
PSM01	▪ All project vessels operating within 12 Nautical Miles (NM) of the coastline will have the boundary of the Buchan Ness to Collieston Coast SPA marked on their navigational systems. ▪ Vessel transit routes will be planned to avoid entering the Buchan Ness to Collieston Coast Special Protection Area (SPA). ▪ Vessels must avoid entering the Buchan Ness to Collieston Coast SPA (the seaward extension of which extends 2 km from the coastline as shown in Error! Reference source not found.) during the period 01 March to 15 September inclusive. Where the RLB overlaps with the SPA, vessel should remain within the RLB. If such vessels are required to enter the SPA outside of the RLB this must be for the purposes of safe navigation (or as agreed with NatureScot), they must avoid approaching cliffs where nesting birds are present and adhere to the Scottish Marine Wildlife Watching Code.