

# Applicant Response to Request for Information

To	Marine Directorate – Licensing Operations Team (MD-LOT)		
From	Collaborative Environmental Associates (CEA) and Intertek		
Project Number	C01494a	Project Name	Eastern Green Link (EGL) 3
Subject	Request for additional information concerning likely placement of cable protection along the Proposed Development.		
Date	27/01/2026	Document Reference	C01494a_NG_MIN_D0739

## 1. Introduction

This Applicant Response is pursuant to a request received from the Marine Directorate – Licensing Operations Team (MD-LOT) on 07 January 2026 in relation to the Eastern Green Link 3 (referred to as ‘the Project’) Marine Licence application (ref: 00011429). For the purposes of seeking the necessary consents, the 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 hereinafter referred to as ‘the Proposed Development’). MD-LOT requested a map or table to be supplied to show consultees viewing the Marine Licence application where cable protection measures may be placed within the Red Line Boundary (RLB) of the Proposed Development. The request and subsequent response are only in relation to the Proposed Development.

## 2. Identifying a Need for Cable Protection Measures

Cable protection measures would be required in areas where the necessary burial depth for the cable cannot be achieved. The exact siting of cable protection measures would be determined at a later stage in the Proposed Development following pre-lay survey, finalisation of the engineering design for installation and during construction activities.

A green-amber-red traffic light colour scheme has been used in the appended map (drawing reference: P2601-PROT-001-A; **Figure 1**) to indicate the likelihood of cable protection measures being required based on the Applicant’s understanding of seabed conditions within the RLB at this time of writing. The likelihood by colour band is defined as follows:

- **Red** = A high likelihood that cable protection measures would be necessary in this area, indicated by the presence or inferred presence (identified from cone penetration testing (CPT) refusal during geotechnical surveys) of hard layers which may present a barrier to achieving sufficient burial.
- **Amber** = A medium likelihood that cable protection measures would be necessary in this area, indicated by the identified geology of the area, e.g. dense clays, which may present a barrier to achieving sufficient burial.
- **Green** = A low likelihood that cable projection measures would be necessary. Based on understanding of geology and from geophysical and geotechnical surveys it has been determined that sufficient burial should be possible; however, the need for protection measures cannot be ruled out and therefore any areas of the route that are not assessed as a high or medium risk for cable protection measures has by default been assessed as a low risk.

## 3. Assessment

The Marine Environmental Appraisal (MEAp) assessment states that an indicative area of 0.135 km<sup>2</sup> (including 0.035 km<sup>2</sup> of which relates to infrastructure crossings) of seabed may be covered by cable protection for the Proposed Development (Chapter 3 - Project Description).

The majority of the RLB is identified to be of a low likelihood that cable protection material would be required. Two high likelihood areas have been identified; one located in inshore waters from around KP578 – 580, and the other in offshore waters neighbouring the 12 nautical mile (NM) boundary within Scottish territorial waters. A further two medium likelihood areas have been identified, one within territorial waters on approach to Sandford Bay (around KP576 – 578) and one within offshore waters around KP541 – 542.

With respect to the inshore area identified to be of high likelihood to require cable protection measures, while the cable burial risk assessment (CBRA) indicates that sufficient burial depths would be met in this area, the presence of hard layers may present a barrier

to cable burial. This area includes examples of the habitats: Annex I medium stoney reef, *Laminaria hyperborea* on tide-side Atlantic infralittoral rock, and *Nephts cirrosa* and *Bathyporeia* spp. in Atlantic infralittoral sand. The offshore area identified to be of a high likelihood to require cable protection measures is sited within an area identified as presenting Annex I *Sabellaria spinulosa* low reef structures.

Nearshore, an area of medium likelihood of requiring cable protection measures is in close proximity or with the potential to overlap with areas of Annex I medium stony reef and *Nephts cirrosa* and *Bathyporeia* spp. in Atlantic infralittoral sand. No sensitive features have been identified within the offshore area of medium likelihood for cable protection measures.

The MEAp supporting the Marine Licence application for the Proposed Development assesses the worst-case scenario that all habitats and features could potentially interact with cable protection materials and consequently lead to permanent habitat loss and other associated impacts.

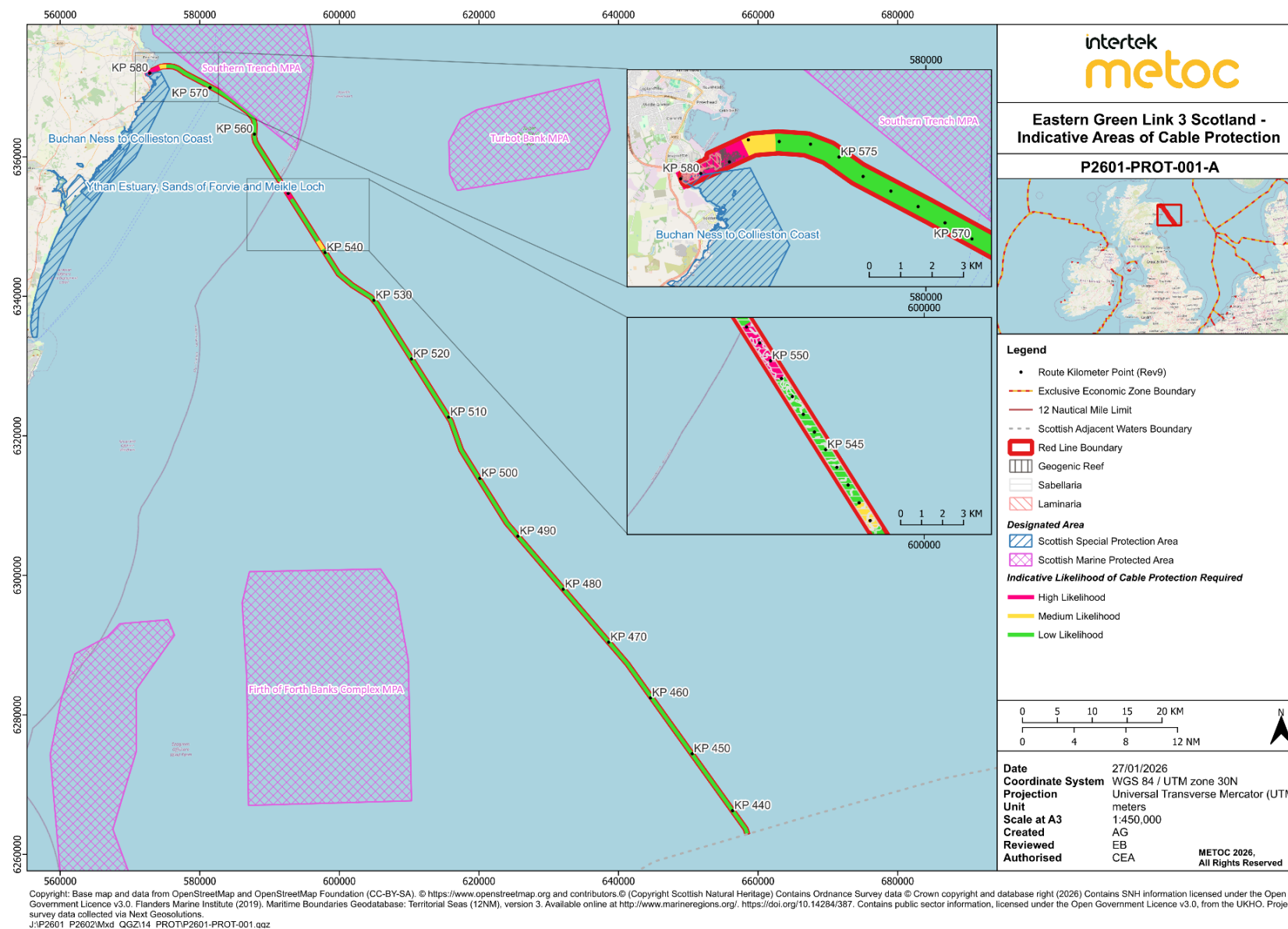


Figure 1. Map showing indicative areas where cable protection measures will be installed for Eastern Green Link (EGL) 3 in Scotland. A green-amber-red traffic light colour scheme has been used to indicate the likelihood of cable protection measures being required. Drawing reference: P2601-PROT-001-A