



Cenos Offshore Windfarm Limited



# Cenos EIA

## Chapter 2 – Need for the Project

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## ACRONYMS

ACRONYM	DEFINITION
AR6	Sixth Assessment Cycle
BEIS	Department for Business, Energy Industrial Strategy
CBF	Community Benefit Funds
CCC	Climate Change Committee
CED	Climate Emergency Declaration
CES	Crown Estate Scotland
CNS	Central North Sea
CO <sub>2</sub>	Carbon Dioxide
COP	Conference of the Parties
DESNZ	Department for Energy Security and Net Zero
EEA	European Economic Area
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EICC	Export/Import Cable Corridor
FTU	Floating Turbine Unit
GHG	Greenhouse Gas
GVA	Gross Value Added
GW	Gigawatt
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Appraisal
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAC	Inter-Array Cable
INTOG	Innovation and Targeted Oil & Gas
IPCC	Intergovernmental Panel on Climate Change
IPF	Initial Plan Framework
km	Kilometre
MHWS	Mean High Water Springs
MLA	Marine Licence Application
MPA	Marine Protected Area
MW	Megawatts

ACRONYM	DEFINITION
NCMPA	Nature Conservation Marine Protected Area
NM	Nautical Miles
NMP	National Marine Plan
NPF4	National Planning Framework 4
NPS	National Policy Statement
NSTA	North Sea Transition Authority
NSTD	North Sea Transition Deal
OEUK	Offshore Energy United Kingdom
OSCP	Offshore Substation Converter Platform
OWIC	Offshore Wind Industry Council
RED	Renewable Energy Directive
RLB	Red Line Boundary
SMP	Sectoral Marine Plan
TOG	Targeted Oil and Gas
UK	United Kingdom
UKCS	United Kingdom Continental Shelf
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
WTG	Wind Turbine Generators

## GLOSSARY

TERM	DEFINITION
<b>2023 Scoping Opinion</b>	Scoping Opinion received in June 2023, superseded by the 2024 Scoping Opinion.
<b>2023 Scoping Report</b>	Environmental Impact Assessment (EIA) Scoping Report submitted in 2023, superseded by the 2024 Scoping Report.
<b>2024 Scoping Opinion</b>	Scoping Opinion received in September 2024, superseding the 2023 Scoping Opinion.
<b>2024 Scoping Report</b>	EIA Scoping Report submitted in April 2024, superseding the 2023 Scoping Report.
<b>Area of Opportunity</b>	The area in which the limits of electricity transmission via High Voltage Alternating Current (HVAC) cables can reach oil and gas assets for decarbonisation. This area is based on assets within a 100 kilometre (km) radius of the Array Area.
<b>Array Area</b>	The area within which the Wind Turbine Generators (WTGs), floating substructures, moorings and anchors, Offshore Substation Converter Platforms (OSCPs) and Inter-Array Cables (IAC) will be present.
<b>Cenos Offshore Windfarm ('the Project')</b>	'The Project' is the term used to describe Cenoss Offshore Windfarm. The Project is a floating offshore windfarm located in the North Sea, with a generating capacity of up to 1,350 Megawatts (MW). The Project which defines the Red Line Boundary (RLB) for the Section 36 Consent and Marine Licence Applications (MLA), includes all offshore components seaward of Mean High Water Springs (MHWS) (WTGs, OSCP, cables, floating substructures moorings and anchors and all other associated infrastructure). The Project is the focus of this Environmental Impact Assessment Report (EIAR).
<b>Cenos Offshore Windfarm Ltd. (The Applicant)</b>	The Applicant for the Section 36 Consent and associated Marine Licences.

TERM	DEFINITION
<b>Cumulative Assessment</b>	The consideration of potential impacts that could occur cumulatively with other relevant projects, plans, and activities that could result in a cumulative effect on receptors.
<b>Developer</b>	Cenos Offshore Windfarm Ltd., a Joint Venture between Flotation Energy and Vårgrønn As (Vårgrønn).
<b>Environmental Impact Assessment (EIA)</b>	The statutory process of evaluating the likely significant environmental effects of a proposed project or development. Assessment of the potential impact of the proposed Project on the physical, biological and human environment during construction, operation and maintenance and decommissioning.
<b>Environmental Impact Assessment Regulations</b>	This term is used to refer to the Environmental Impact Assessment Regulations which are of relevance to the Project. This includes the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended); and the Marine Works (Environmental Impact Assessment) Regulations 2007.
<b>Environmental Impact Assessment Report</b>	A report documenting the findings of the EIA for the Project in accordance with relevant EIA Regulations.
<b>Export/Import Cable</b>	High voltage cable used to export/import power between the OSCP and Landfall.
<b>Export/Import Cable Bundle (EICB)</b>	Comprising two Export/Import Cables and one fibre-optic cable bundled in a single trench.
<b>Export/Import Cable Corridor (EICC)</b>	The area within which the Export/Import Cable Route will be planned and the Export/Import Cable will be laid, from the perimeter of the Array Area to MHWS.
<b>Export/Import Cable Route</b>	The area within the Export/Import Export Corridor (EICC) within which the Export/Import Cable Bundle (EICB) is laid, from the perimeter of the Array Area to MHWS.

TERM	DEFINITION
<b>Floating Turbine Unit (FTU)</b>	The equipment associated with electricity generation comprising the WTG, the floating substructure which supports the WTG, mooring system and the dynamic section of the IAC.
<b>Flotation Energy</b>	Joint venture partner in Cenos Offshore Windfarm Ltd.
<b>Habitats Regulations</b>	The Habitats Directive (Directive 92/43/ECC) and the Wild Birds Directive (Directive 2009/147/EC) were transposed into Scottish Law by the Conservation (Natural Habitats &c) Regulations 1994 ('Habitats Regulations') (up to 12 NM); by the Conservation of Offshore Marine Habitats and Species Regulations 2017 ('Offshore Marine Regulations') (beyond 12 NM); the Conservation of Habitats and Species Regulations 2017 (of relevance to consents under Section 36 of the Electricity Act 1989); the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001; and the Wildlife and Countryside Act 1981. The Habitats Regulations set out the stages of the Habitats Regulations Appraisal (HRA) process required to assess the potential impacts of a proposed project on European Sites (Special Areas of Conservation, Special Protection Areas, candidate SACs and SPAs and Ramsar Sites).
<b>Habitats Regulations Appraisal</b>	The assessment of the impacts of implementing a plan or policy on a European Site, the purpose being to consider the impacts of a project against conservation objectives of the site and to ascertain whether it would adversely affect the integrity of the site.
<b>High Voltage Alternating Current (HVAC)</b>	Refers to high voltage electricity in Alternating Current (AC) form which is produced by the WTGs and flows through the IAC system to the OSCPs. HVAC may also be used for onward power transmission from the OSCPs to assets or to shore over shorter distances.
<b>High Voltage Direct Current (HVDC)</b>	Refers to high voltage electricity in Direct Current (DC) form which is converted from HVAC to HVDC at the OSCPs and transmitted to shore over longer distances.
<b>Horizontal Directional Drilling (HDD)</b>	An engineering technique for laying cables that avoids open trenches by drilling between two locations beneath the ground's surface.



TERM	DEFINITION
<b>Innovation and Targeted Oil &amp; Gas (INTOG)</b>	In November 2022, the Crown Estate Scotland (CES) announced the Innovation and Targeted Oil & Gas (INTOG) Leasing Round, to help enable this sector-wide commitment to decarbonisation. INTOG allowed developers to apply for seabed rights to develop offshore windfarms for the purpose of providing low carbon electricity to power oil and gas installations and help to decarbonise the sector. Cenos is an INTOG project and in November 2023 secured an Exclusivity Agreement as part of the INTOG leasing round.
<b>Inter-Array Cable (IAC)</b>	The cables which connect the WTGs to the OSCP. WTGs may be connected with IACs into a hub or in series as a 'string' or a 'loop' such that power from the connected WTGs is gathered to the OSCP via a single cable.
<b>Joint Venture</b>	The commercial partnership between Flotation Energy and Vårgrønn, the shareholders which hold the Exclusivity Agreement with CES to develop the Cenos site as an INTOG project.
<b>Landfall</b>	The area where the Export/Import Cable from the Array Area will be brought ashore. The interface between the offshore and onshore environments.
<b>Marine Licence</b>	Licence required for certain activities in the marine environment and granted under the Marine and Coastal Access Act 2009 and/or the Marine (Scotland) Act 2010.
<b>Marine Protected Area (MPA)</b>	Marine sites protected at the national level under the Marine (Scotland) Act 2010 out to 12 NM, and the Marine and Coastal Access Act 2009 between 12-200 NM. In Scotland MPAs are areas of sea and seabed defined so as to protect habitats, wildlife, geology, underseas landforms, historic shipwrecks and to demonstrate sustainable management of the sea.
<b>Marine Protected Area (MPA) Assessment</b>	A three-step process for determining whether there is a significant risk that a proposed development could hinder the achievement of the conservation objectives of an MPA.
<b>Mean High Water Springs (MHWS)</b>	The height of Mean High Water Springs is the average throughout the year, of two successive high waters, during a 24-hour period in each month when the range of the tide is at its greatest.

TERM	DEFINITION
<b>Mean Low Water Springs (MLWS)</b>	The height of Mean Low Water Springs is the average throughout a year of the heights of two successive low waters during periods of 24 hours (approximately once a fortnight).
<b>Mitigation Measures</b>	<p>Measures considered within the topic-specific chapters in order to avoid impacts or reduce them to acceptable levels.</p> <ul style="list-style-type: none"> <li>• Primary mitigation - measures that are an inherent part of the design of the Project which reduce or avoid the likelihood or magnitude of an adverse environmental effect, including location or design;</li> <li>• Secondary mitigation – additional measures implemented to further reduce environmental effects to ‘not significant’ levels (where appropriate) and do not form part of the fundamental design of the Project; and</li> <li>• Tertiary mitigation – measures that are implemented in accordance with industry standard practice or to meet legislative requirements and are independent of the EIA (i.e. they would be implemented regardless of the findings of the EIA).</li> </ul> <p>Primary and tertiary mitigation are referred to as embedded mitigation. Secondary mitigation is referred to as additional mitigation.</p>
<b>Mooring System</b>	Comprising the mooring lines and anchors, the mooring system connects the floating substructure to the seabed, provides station-keeping capability for the floating substructure and contributes to the stability of the floating substructure and WTG.
<b>Nature Conservation Marine Protected Area (NCMPA)</b>	MPA designated by Scottish Ministers in the interests of nature conservation under the Marine (Scotland) Act 2010.
<b>Offshore Substation Converter Platforms (OSCPs)</b>	An offshore platform on a fixed jacket substructure, containing electrical equipment to aggregate the power from the WTGs and convert power between HVAC and HVDC for export/import via the export/import cable to/from the shore. The OSCP will also act as power distribution stations for the Oil & Gas platforms.
<b>Onward Development</b>	Transmission projects which are anticipated to be brought forward for development by 3 <sup>rd</sup> party oil and gas operators to enable electrification of assets via electricity generated by the Project. All Onward Development will subject to separate marine licensing and permitting requirements.
<b>Onward Development Area</b>	The area within which oil and gas assets would have the potential to be electrified by the Project.

TERM	DEFINITION
<b>Onward Development Connections</b>	Oil and gas assets located in the waters surrounding the Array Area will be electrified via transmission infrastructure which will connect to the Project's OSCPs. These transmission cables are referred to as Onward Development Connections.
<b>Project Area</b>	The area that encompasses both the Array Area and EICC.
<b>Project Design Envelope</b>	A description of the range of possible elements that make up the Project design options under consideration and that are assessed as part of the EIA for the Project.
<b>Study Area</b>	Receptor specific area where potential impacts from the Project could occur.
<b>Transboundary Assessment</b>	The consideration of impacts from the Project which have the potential to have a significant effect on another European Economic Area (EEA) state's environment. Where there is a potential for a transboundary effect, as a result of the Project, these are assessed within the relevant EIA chapter.
<b>Transmission Infrastructure</b>	The infrastructure responsible for moving electricity from generating stations to substations, load areas, assets and the electrical grid, comprising the OSCPs, and associated substructure, and the Export/Import Cable.
<b>Vårgrønn As (Vårgrønn)</b>	Joint venture partner in Cenos Offshore Windfarm Ltd.
<b>Wind Turbine Generator (WTG)</b>	The equipment associated with electricity generation from available wind resource, comprising the surface components located above the supporting substructure (e.g., tower, nacelle, hub, blades, and any necessary power transformation equipment, generators, and switchgears).
<b>Worst-Case Scenario</b>	The worst-case scenario based on the Project Design Envelope which varies by receptor and/or impact pathway identified.

## 2 NEED FOR THE PROJECT

### 2.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) presents a summary of the need for renewable energy developments such as the Project, the main climate change and energy objectives, and targets which are determining the direction of the offshore wind energy industry, as well as the relevant legislation, policy and guidance (see Section 2.2.2).

The objectives of the Project include generation of low carbon energy and supporting the decarbonisation of the oil and gas industry through electrification of surrounding assets and reduction, or elimination of the emissions directly associated with fossil fuel production activities. The decarbonisation aims of the Project will support the commitments and policies discussed in Section 2.2.2 and are further detailed in the **EIAR Vol. 2, Chapter 3: Policy and Legislative Context**. Further details on the decarbonisation of oil and gas platforms are provided in Section 2.2.4.

There is also a need for new energy infrastructure to support the United Kingdom's (UK) requirement for energy security through a well-coordinated energy transition. This key driver underpins the UK offshore oil and gas industry's North Sea Transition Deal (NSTD) with the UK Government, targeting net zero carbon emissions by 2050. Through the NSTD, the oil and gas industry has committed to a 50% reduction in Greenhouse Gas (GHG) emissions by 2030 and the North Sea Transition Authority (NSTA) is driving the process of achieving these targets by facilitating multi-industry partnerships between renewable energy developers and oil and gas asset operators. By positioning the project in the Central North Sea (CNS), the Applicant has maximised the opportunity to electrify a number of oil and gas assets with longer production timelines, as well as potential green field developments which may come online over the lifetime of the Project.

The Project would respond to the socio-economic needs of Scotland and the UK through:

- The reduction of energy importation fees by switching to locally produced energy;
- Extending the lifecycle of oil and gas assets connecting to the Project by reducing fossil fuel energy use on extraction and production activities, as well as enabling those assets to continue to meet ongoing fossil fuel demands within the UK; and
- Providing investment and job opportunities at local, regional and national scales.

Collectively, the above demonstrates how the Project can provide for a just energy transition within the remote Northeast of Scotland. An overview of the Project's socio-economic benefits is provided within Section 2.4 and further details are provided in the **EIAR Vol. 3, Chapter 19: Socio-economics, Tourism, and Recreation**.

The need for the Project is outlined in the following sections, and is centred around four key topics:

- Climate change;
- New energy infrastructure;
- Energy security; and
- Socio-economics.

## 2.2 Climate Change and New Energy Infrastructure

### 2.2.1 Overview

Climate change and the subsequent need to reduce carbon emissions are the driving force towards moving to low carbon energy alternatives. In April 2019, the First Minister of the Scottish Government ('First Minister') and subsequently the UK Parliament, declared a climate emergency, publicly stating their concern about climate change and its consequences (Climate Emergency Declaration (CED), 2019a; CED, 2019b).

The United Nations (UN) has been leading climate summits referred to as the 'Conference of the Parties' (COP) since March 1995. There is an international consensus to address the rising concerns of climate change and during COP21, in 2015, this was formally agreed with the Paris Agreement and 196 parties signing the United Nations Framework Convention on Climate Change (UNFCCC) (further details in Section 2.2.1.1). This is a legally binding document with the parties agreeing to the following:

- A long-term goal of keeping the increase in global average temperature to well below 2°C above pre-industrial levels;
- An aim to limit the increase to 1.5°C since this would significantly reduce risks and the impacts of climate change;
- The need for global GHG emissions to peak as soon as possible; and
- To undertake rapid reductions thereafter in accordance with the best scientific guidance available.

#### 2.2.1.1 COP26

The UK hosted the 26<sup>th</sup> UN Climate Change COP (COP26) in Glasgow, Scotland, in November 2021. The COP26 summit focused on accelerating action towards achieving the goals of the Paris Agreement and the UNFCCC. The main outcome of COP26 was the Glasgow Climate Pact, a series of decisions and resolutions that build on the Paris Agreement and establish what needs to be done to accelerate action on climate change within this decade. Whilst every Party at COP26 – representing almost 200 countries – agreed to the Glasgow Climate Pact, the pact itself is not legally binding. During the COP26 event the First Minister detailed how Scotland would continue to work towards maintaining a leading role to tackling climate change (Scottish Government, 2021).

The First Minister's address reaffirmed Scotland's renewable energy potential and the role that renewable energy developments can play in realising Scotland's targets of becoming a net zero country by 2045 at the latest. The progress achieved through the Glasgow Climate Pact per COP26 was highlighted within an address made by the First Minister to the Scottish Parliament, noting that further steps are still required, with the First Minister stating *"the world is still on a path to temperature increases of well over 2 degrees. To keep 1.5 degrees in reach, global emissions must be almost halved by the end of this decade"*. Renewable energy projects have been marked as a crucial need in the aims to achieving the climate goals and addressing the climate emergency arising from the emission of GHGs.

#### 2.2.1.2 COP27

COP27 was held in Egypt in November 2022, and the conference's key aim was to ensure full implementation of the Paris Agreement and to put negotiations into concrete actions. During COP27 it was agreed that countries would establish a fund to compensate vulnerable nations for 'loss and damage' from climate change induced disasters. As a renewable energy source, the Project would support achieving the low carbon energy to reach the net zero goals.

### 2.2.1.3 COP28

COP28 was held in Dubai, United Arab Emirates, in November / December 2023. This COP28 summit marked the conclusion of the first global stocktake in progress towards achievement of the goals of the Paris Agreement. While the results revealed that progress was insufficient in limiting global warming to 1.5°C, the main outcome of COP28 was the agreement to accelerate the transition away from fossil fuels and to significantly increase renewable energy capacity and energy efficiency by 2030. Nearly 200 countries agreed to this ambitious plan.

### 2.2.1.4 COP29

COP29 was held in Baku, Azerbaijan, in November 2024. This COP29 summit focussed on enhancing the ambition to meet the goals of the Paris Agreement and advancing global climate action. The main outcome of COP29 while facing criticism for being insufficient was an agreement on a \$300 billion climate deal to support developing countries in addressing climate change. COP29 Global Energy Storage and Grids Pledge was also launched aiming to deploy 1,500 Gigawatt (GW) of global energy storage by 2030. The conference also highlighted the need for increased collaboration to drive climate solutions and ensure a liveable planet for all.

### 2.2.1.5 Intergovernmental Panel on Climate Change (IPCC)

The IPCC is the UN's body for assessing science which relates to climate change. The IPCC is currently on its Sixth Assessment Cycle (AR6) and has published three reports from its working group which include:

- AR6 Climate Change 2021: The Physical Science – this report details the global evidence that effects arising from human-induced climate change (e.g. heatwaves, heavy precipitation, droughts) have increased. This report highlights that global surface temperatures will increase under all emission scenarios and global warming of 1.5°C and 2°C will be exceeded except for situations with drastic reductions in Carbon Dioxide (CO<sub>2</sub>);
- AR6 Climate Change 2022: Mitigation of Climate Change – this report details the impacts from human-induced climate change noting an increase in frequency of intense events which have widespread impacts resulting in loss and damage of human and nature receptors outwith natural variability;
- AR6 Climate Change 2022: Impacts, Adaption and Vulnerability – details the modelled pathways, which would limit global warming noting rapid, deep and immediate GHG emission reductions in all sectors. The strategies outlined include moving to a net zero emission strategy, moving away from the use of fossil fuels and utilising clean, renewable, alternative energy; and
- AR6 Synthesis Report Climate Change 2023: This report integrates the findings of the three working group reports described above in addition to the three special reports detailed below. This report has considered all the highlighting points in each report to provide a detailed overview of risks and impacts arising from climate change.

In addition to the AR6 reports, the IPCC has published special reports from its working groups relating to the marine environment and climate change. This includes reports such as:

- The Ocean and Cryosphere in a Changing Climate (IPCC, 2019a);
- Global Warming of 1.5°C (IPCC, 2018); and
- Climate Change and Land (IPCC, 2019b).

## 2.2.2 General Legislation and Policy

This Section provides an overview of the general legislation and policy which relate to climate change and the addition of new energy infrastructure with a focus on renewable energy projects. Figure 2-1 provides an overview of the timeframe and similarities across international, European, UK, and Scottish legislation. The following legislation and policy have been considered further within **EIAR Vol. 2, Chapter 3: Policy and Legislative Context**:

- International;
  - UNFCCC (UN, 1992);
  - The Kyoto Protocol under the UNFCCC (UN, 1998);
  - The Paris Agreement under the UNFCCC (UN, 2016);
- European;
  - Renewable Energy Directive (RED) I (2009/28/EC) (RED I) (European Union, 2009);
  - RED II (2018/2001/EU) (RED II) (European Union, 2018);
- UK;
  - Climate Change Act (2008) (UK Government, 2008);
  - The Energy Act (2013) (UK Government, 2013);
  - UK Government’s Clean Growth Strategy (Department for Business, Energy Industrial Strategy (BEIS), 2017);
  - Energy White Paper 2020 and the Net Zero Strategy: Build Back Greener 2021 (HM Government, 2021);
  - British Energy Security Strategy (2022) (UK Government, 2022);
  - The Energy Act (2023) (UK Government, 2023);
  - Overarching National Policy Statement (NPS) (EN-1) (Department for Energy Security and Net Zero (DESNZ) 2023a);
  - Overarching NPS (EN-3) (DESNZ, 2023b); and
  - Powering Up Britain: Net Zero Growth Plan - Policy paper (DESNZ, 2023c)
- Scotland;
  - The Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (UK Government, 2019);
  - The Scottish Energy Strategy (2017) (Scottish Government, 2017);
  - Scottish Government Offshore Wind Policy Statement (Scottish Government, 2020a);
  - National Marine Plan (NMP) (Scottish Government, 2015);
  - Sectoral Marine Plan (SMP) for Offshore Wind Energy 2020 (Scottish Government, 2020b);
  - SMP Offshore wind for innovation and targeted oil and gas decarbonisation: Initial Plan framework (Scottish Government, 2022);
  - Draft Scottish Energy Strategy and Just Transition Plan (2023) (Scottish Government, 2023a); and
  - National Planning Framework 4 (NPF4) (2023) (Scottish Government, 2023b).

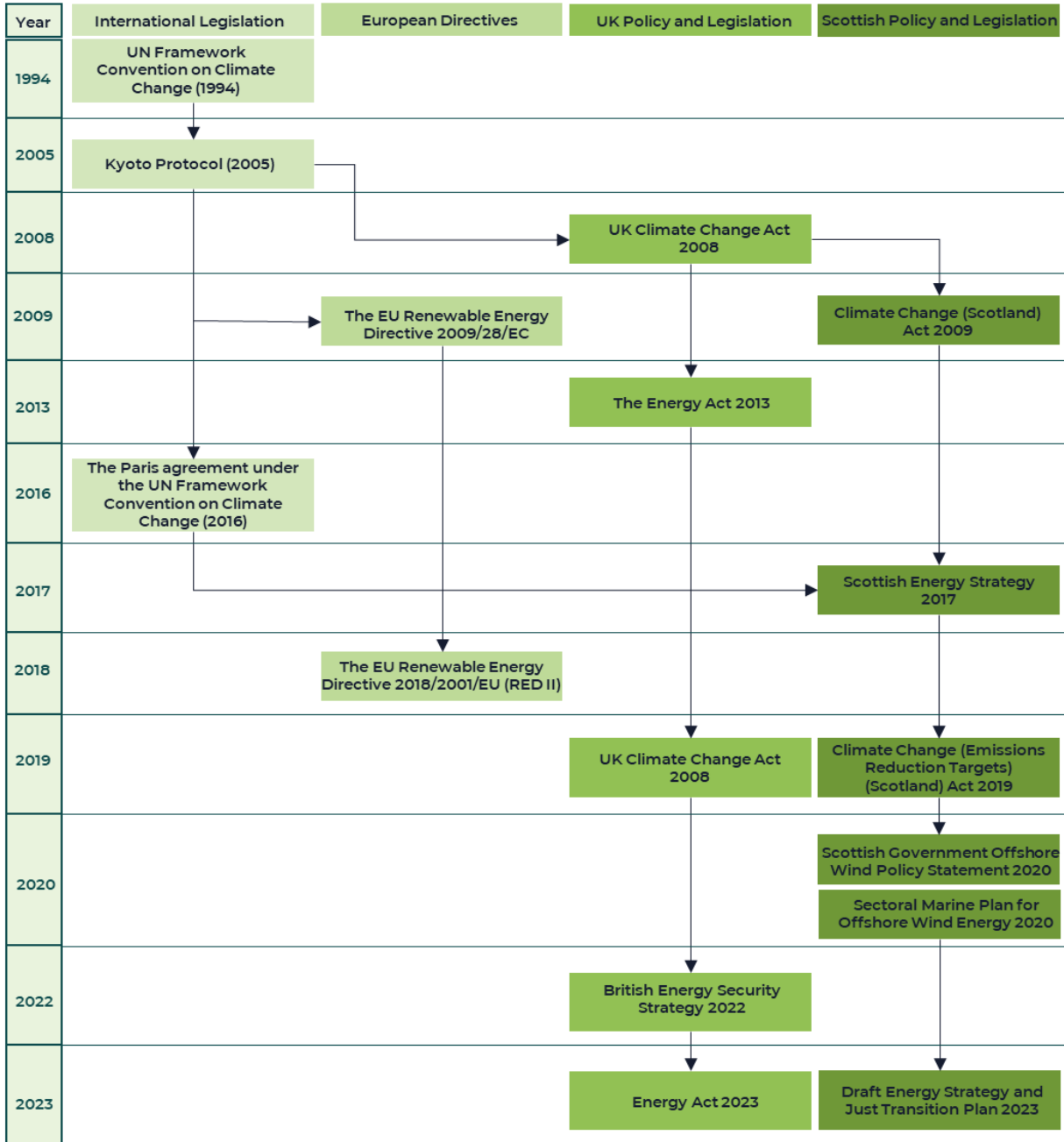


Figure 2-1 Climate change and renewable energy legislation and policy



## 2.2.3 Climate change strategies

### 2.2.3.1 Scotland's energy strategy

The Scottish Energy Strategy: The Future of Energy in Scotland (Scottish Government, 2017) sets out the Scottish Government's vision for the future energy system, focusing on a vision for Scotland by the year 2050. The Strategy states that "a diverse, well balanced energy supply portfolio or 'energy mix' will remain essential as Scotland decarbonises, providing the basis for secure and affordable heat, mobility, and power in future decades".

The Strategy sets two new targets for the Scottish energy system by 2030:

- The equivalent of 50% of the energy for Scotland's heat, transport, and electricity consumption to be supplied from renewable sources; and
- An increase by 30% in the productivity of energy use across the Scottish economy.

The Energy Strategy: Position Statement (Scottish Government 2021), published in March 2021 reinforces a commitment to remain guided by the key principles set out in Scotland's Energy Strategy, and sets out a number of key priorities for the short to medium-term.

In January 2023, the Draft Energy Strategy and Just Transition Plan was published which acknowledges the important role the oil and gas industry has played towards the Scottish economy and identity. This draft Strategy sets out policy positions on oil and gas, both offshore and onshore. It demonstrates support for the fastest possible just transition for the oil and gas sector, in order to secure *"a bright future for a revitalised North Sea energy sector focused on renewables"*.

### 2.2.3.2 Scotland's emission reduction targets

The Climate Change (Scotland) Act 2009 is an act of the Scottish Parliament creating the statutory framework for GHG reductions in Scotland (UK Government, 2019).

The emissions reduction targets encompass achieving net zero GHG emissions by no later than 2045. Additionally, the Act stipulates interim targets, including a reduction of at least 56% by 2020, 75% by 2030, and 90% by 2040. In April 2024, the Scottish Government announced that it would scrap the interim target to 2030 with Mairi McAllan stating *"The 2030 target is now out of reach"*. In response to this announcement, the Scottish Government also confirmed they would bring forward expiated legislation to address matters (Scottish Government, 2024).

In November 2022, Crown Estate Scotland (CES) announced the Innovation and Targeted Oil & Gas (INTOG) Leasing Round, to help enable this sector-wide commitment to decarbonisation. INTOG allows developers to apply for the rights to construct offshore windfarms for the purpose of providing low carbon electricity to power oil and gas installations and help to decarbonise the sector. This is discussed further in Section 2.2.4.

### 2.2.3.3 Scotland's offshore wind commitments

The commitment to offshore wind targets was established in the Offshore Wind Sector Deal agreed between the Government and the offshore wind industry in 2019 and updated in March 2020 (Department for Business and Trade; BEIS and DESNZ, 2020). Originally targeting 30 GW of operating capacity by 2030, this figure was increased to 50

GW in the Energy White Paper published in 2020 (BEIS, 2020), as part of the plan for the green industrial revolution. In its Sixth Carbon Budget, published in 2020, the Climate Change Committee (CCC) recommended that offshore wind should become the backbone of the whole UK energy system, growing from 40 GW of capacity in 2030 to 100 GW or more by 2050 (CCC, 2020). In October 2021, the UK Government committed to decarbonise the UK's electricity system by 2035 (HM Government, 2021).

Scotland is committed to ensuring secure, reliable, and affordable energy supplies, within the context of long-term decarbonised energy generation. In October 2020, the SMP for Offshore Wind Energy (Scottish Government, 2020b) was published providing the spatial framework for commercial scale offshore wind through the ScotWind leasing round. Within the SMP there was optionality for the Scottish Ministers to explore the demand for future leasing rounds aimed at the decarbonisation of the oil and gas sector in Scotland.

The Project provides an opportunity to reduce emissions directly related to production activities associated with current oil and gas facilities located in the Targeted Oil and Gas (TOG) 'Ea Area' (see Figure 2-2), making a positive contribution towards reducing GHG emissions and ensuring a sustainable supply of renewable energy. The Scottish Government's 'Draft Energy Strategy and Just Transition Plan' (2023) details a strong dedication to scaling up offshore wind capacity, with a target of more than 20 GW of additional renewable electricity on and offshore by 2030 (Scottish Government, 2023a). Furthermore, the UK Government's 'British Energy Security Strategy' (2022) aims to install 50 GW of new offshore wind capacity by 2030, including 5 GW from floating offshore wind. Therefore, the Project will contribute to Scottish and UK targets for offshore wind in addition to reducing the GHG emissions of oil and gas assets (UK Government, 2022).

## 2.2.4 INTOG leasing round

In August 2021, the Scottish Government confirmed it would be undertaking a spatial planning exercise for INTOG projects. This was followed by the Planning Specification and Context Report in August 2021 which identified a number of proposed areas of search in which oil and gas decarbonisation projects would be considered. CES announced the INTOG Leasing Round in November 2022, which aimed to help enable this sector-wide commitment to decarbonisation. In February 2022, the Initial Plan Framework (IPF) was published; it sets out the planning framework and details the areas of seabed forming the spatial footprint for the CES leasing process. Through the INTOG leasing process, the Applicant successfully secured an Exclusivity Agreement as a TOG project in November 2023. There were nine areas identified for project use within the Scottish North Sea; the Project is wholly located within the proposed 'East a' area (E-a).

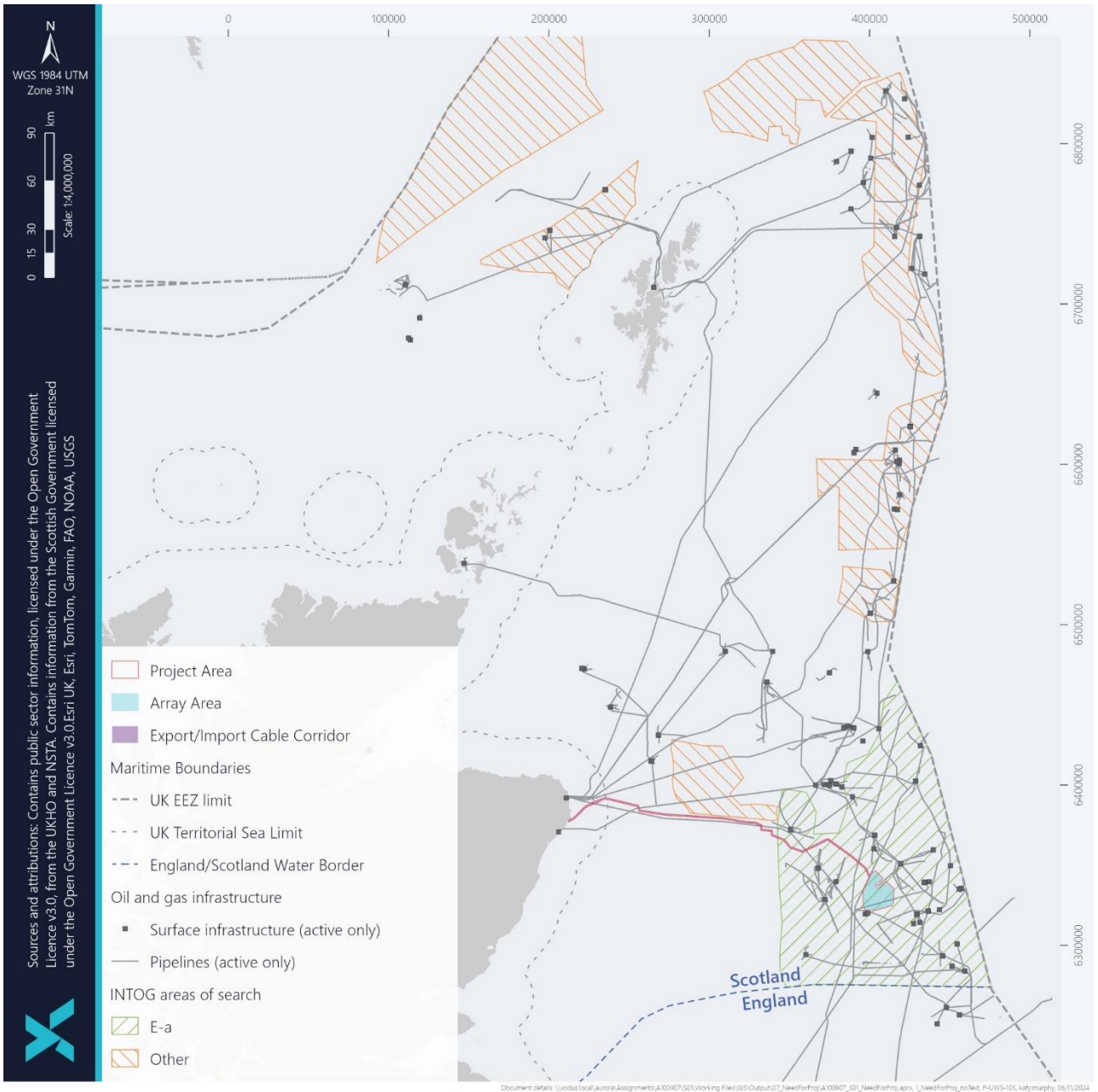


Figure 2-2 Project INTOG area and associated oil and gas infrastructure

#### 2.2.4.1 North Sea Transition Deal (NSTD)

In March 2021, the NSTD which is a sector deal between the UK Government and the oil and gas industry, with the aim to facilitate the decarbonisation of the oil and gas sector, was established, encouraging the UK to harness the power of the UK offshore oil and gas industry to deliver the 2050 net zero target. The UK oil and gas industry has committed to reductions of:

- 10% CO<sub>2</sub> reduction by 2025;
- 25% CO<sub>2</sub> reduction by 2027; and
- 50% CO<sub>2</sub> reduction by 2030.

It is acknowledged that platform electrification is a key component of the NSTA vision for an integrated energy basin. Outcome 1 of the NSTD is for investment and deployment of new technologies that allow for a step change in emissions reductions, in particular platform electrification and decarbonisation.

The Marine Directorate are responsible for the integrated management of Scottish seas. In line with the management of Scottish seas, a SMP for INTOG Decarbonisation is under development. This will offer projects included within the final plan with an Option Agreement, however, there is currently no firm publication date and therefore, the INTOG SMP has not been considered further within the Project EIAR. Option Agreements are anticipated to be awarded following the completion of the SMP for INTOG. However, CES have confirmed they are willing to enter into Option Agreements with any INTOG developer who has been granted a Section 36 consent and Marine Licence(s).

#### 2.2.4.2 Onward Development Connections

A central aim of the Project is to provide the opportunity for oil and gas assets located in the waters surrounding the Array Area to electrify via transmission infrastructure connecting to the Project's electricity hub (i.e. OSCPs). These future projects form part of the anticipated future Onward Development which would be originated by the Project, referred to as Onward Development Connections.

The Onward Development Connections for oil and gas electrification will be finalised and brought forward by 3<sup>rd</sup> party oil and gas operators, subject to separate marine licencing and permitting requirements (including separate EIAs, as appropriate). At this very early stage in the process, the information available about these connections is limited and cannot be confirmed by the Project. In accordance with standard practice and relevant industry guidance, the level of information available means there is insufficient detail to enable full inclusion within a cumulative effects assessment. However, recognising industry feedback and a keen interest in this topic from stakeholders, the Applicant has provided a qualitative assessment of the combined impact of the Project and Onward Development Connections, to the extent it can with the limited details on possible Onward Development. Please refer to EIAR Vol. .3, Chapter 22: Statement of Combined Effects for further details.

The relevant oil and gas legislation will be taken into account when the Marine Licences associated with the Onward Development Connections are applied for.

## 2.3 Energy Security

Energy supply is required to be reliable, secure and affordable. Historically, fossil fuels have been the primary source of energy however in line with climate change goals such as the UK net zero target and the Climate Change (Scotland) Act 2009, a new alternative is required for energy security. This alternative is required to support the UK and Scotland's net zero targets whilst still ensuring the energy produced is reliable, secure and affordable (UK Government, 2009). The new alternative energy supply would require new energy infrastructure to support these goals and it is important for the new infrastructure to seek to maximise the economic and supply opportunities for Scotland and the UK (see Section 2.4).

As highlighted in the relevant legislation and policy,<sup>1</sup> the development of renewable energy projects is the key to achieving these goals. A particular focus for this Project is the 'Draft Energy Strategy and Just Transition Plan' published by the Scottish Government in January 2023. This document highlights that it is vital for the energy security of the country for Scotland to:

- Develop its own resources;
- Create additional storage of energy; and
- Decarbonise oil and gas platforms.

The Project contributes to important aspects of energy security through:

- Supporting the continuation of existing indigenous oil and gas production whilst reducing the GHGs associated with the operations;
- Growth of renewable electricity, addressing domestic electricity requirements; and
- Reducing the reliance on foreign energy importation, as set out in the Draft Energy Strategy and Just Transition Plan (2023) a focus to 'deliver a fairer, more secure energy system that is no longer reliant on volatile international commodity markets and delivers lower costs for consumers.' (Scottish Government, 2023a).

## 2.4 Economic Benefit

The installation of renewable infrastructure has the opportunity to provide multiple areas of economic benefit to Scotland and the UK. The following is a summary of the potential economic benefits which may occur as a result of the Project noting further details are provided in **the EIAR Vol. 3, Chapter 19: Socio-economics, Tourism and Recreation**.

The Project will electrify oil and gas assets which are located within the Onward Development Area. Electrification refers to electricity generated from fuel gas (hydrocarbon) on offshore installations being replaced by electricity of lower carbon intensity e.g. from renewable sources. The NSTD aims to secure and create high-value jobs (Section 2.4.3), creating opportunity for growth while progressing net zero objectives. Electrification is considered essential to the industry retaining its social licence to operate, as per the NSTA Stewardship Expectation 11 which

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<sup>1</sup> Relevant legislation and policy includes: Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, Scottish Government Offshore Wind Policy Statement (2020), British Energy Security Strategy (2022), Draft Scottish Energy Strategy and Just Transition Plan (2023)

requires the industry to reduce upstream GHG emissions, as far as reasonable, to assist in meeting net zero targets (NSTA, 2021).

The Project aligns with the UK Government's objectives of achieving net zero emissions and enhancing energy security by aiding the decarbonisation of the offshore energy sector through the electrification of existing oil and gas infrastructure in the Onward Development Area.

### 2.4.1 Importation Fees

The production of home-grown energy will avoid the requirement for Scotland and the rest of the UK to spend money on the importation of energy. By increasing local energy production, Scotland can reduce its reliance on imported energy. This directly cuts down on importation fees, which can be substantial. The reduced expenditure of importing energy from other countries will allow for funds to be dedicated to other resources required. With a secure and stable local energy supply, Scotland can avoid the volatility of international energy markets. This stability can lead to more predictable and often lower energy costs for consumers and businesses.

Oil and gas activity on the United Kingdom Continental Shelf (UKCS) accounted for 3% of net UK GHG emissions in 2021 (NSTA, 2022). In 2022, UK upstream GHG emissions fell by an estimated 3% year-on-year, contributing to a total of 23% reduction between 2018 and 2022 (NSTA, 2022). This demonstrates industry commitment to reducing associated GHG emissions by 25% by 2027, and 50% by 2030 against a 2018 baseline. In 2022, 79% of upstream oil and gas emissions were from the combustion of hydrocarbons for offshore power generation, with a lower percentage from contributions from flaring and venting. Electrification of oil and gas assets will help the UK secure the energy required when considering current predictions for 2050, which indicate a deficit of approximately 3–7 million tonnes of oil equivalent and 5–15 million tonnes of gas (DESNZ, 2024).

### 2.4.2 Investment Opportunities

The Project has the potential to boost the economy at local, regional, and national levels by increasing investment opportunities, creating job opportunities within the supply chain, and requiring skilled workers. According to the Office for National Statistics, private investment in UK renewable energy reached approximately £6.4 billion in 2020 (Office for National Statistics, 2024). With respect to oil and gas, it was highlighted by Offshore Energy United Kingdom (OEUK), that for every £1 million of Gross Value Added (GVA) provided by the industry, approximately £2.1 million is generated within the UK economy (OEUK, 2023). The Project would require skilled workers during the construction and operation and maintenance of the Project and therefore there is a high likelihood that this would result in a positive impact on the economy (Section 2.4.3). The Project would also provide opportunities for skilled workers to transition from the oil and gas field to the renewable energy sector.

### 2.4.3 Job Opportunities

The Offshore Wind Industry Council (OWIC) in June 2023 recorded that the offshore wind industry supported approximately 32,257 jobs in the UK (noting a 4% increase from 31,082 in March 2022). This number is predicted to rise to 69,800 by 2026 and to 105,000 by 2030 (OWIC, 2023). In relation to the Scottish renewable energy industry and the associated supply chain, approximately 15,005 jobs in 2021 were created as a result of the industry which

would not exist otherwise (Scottish Renewables, 2023). This level of job creation is recognised by the UK Government which has set a target of 50 GW of new offshore wind capacity to be installed by 2030 with the aim to reach net zero emissions by 2050, emphasising the potential job creation which could result (UK Government, 2022).

#### 2.4.4 Community Benefit Fund (CBF)

The Project will take into consideration the available guidance of the 'Good Practice Principles for Community Benefit from Offshore Renewable Energy Developments' (Scottish Government, 2018) and should it become available, the new draft guidance (Scottish Government, 2023a). The draft guidance consultation looks to build the evidence base of community benefits and explore the potential for shared ownership of offshore renewable energy, with an aim of 2 GW of community and locally owned renewable energy by 2030.

Cenos is fully committed to delivering a community benefit scheme in line with UK Government guidance, which is due to be published this year. Ahead of the guidance being published we have been working with local people, businesses and organisations to identify key themes and projects that will deliver strategic benefits and directly support the local community and local priorities. We welcome further input from the local community to help shape the community benefit scheme and encourage you to reach out to the project team via [hello@cenosoffshorewind.com](mailto:hello@cenosoffshorewind.com).

#### 2.4.5 Conclusion

The objectives of the Project include generation of low carbon energy and supporting the decarbonisation of the oil and gas industry through electrification of surrounding assets and reduction, or elimination of the emissions directly associated with fossil fuel production activities. There is a need for new energy infrastructure to support the UK's requirement for energy security through a well-coordinated energy transition.

The Project would respond to the needs of Scotland and the UK through:

- Contributing to 2030 and 2045/2050 net zero targets;
- The reduction of energy importation fees by switching to locally produced energy;
- Extending the lifecycle of oil and gas assets connecting to the Project by reducing fossil fuel energy use on extraction and production activities, as well as enabling those assets to continue to meet ongoing fossil fuel demands within the UK; and
- Providing investment and job opportunities at local, regional and national scales.



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