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Offshore Petroleum Regulator  
for Environment & Decommissioning

PERENCO UK LIMITED  
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Registered No.: 04653066

Date: 11th May 2021

Department for Business, Energy  
& Industrial Strategy

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[bst@beis.gov.uk](mailto:bst@beis.gov.uk)

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020  
PIPELINE REMEDIATION PROJECT PL23**

A screening direction for the project detailed in your application, reference PL/2086/0 (Version 3), dated 26th April 2021 has been issued under regulation 6 of the above Regulations. The screening direction notice, and any relevant conditions and comments are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact [REDACTED] on [REDACTED] or email the Environmental Management Team at [bst@beis.gov.uk](mailto:bst@beis.gov.uk).

Yours faithfully



**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020**

**SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT  
ASSESSMENT IS NOT REQUIRED**

**PIPELINE REMEDIATION PROJECT PL23**

**PL/2086/0 (Version 3)**

Whereas PERENCO UK LIMITED has made an application dated 26th April 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 11th May 2021



## **THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020**

### **SCHEDULE OF SCREENING DIRECTION CONDITIONS**

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

#### **1 Screening direction validity**

The screening direction shall be valid from 11 May 2021 until 30 September 2021.

#### **2 Commencement and completion of the project**

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: [bst@beis.gov.uk](mailto:bst@beis.gov.uk)

#### **3 Nature of stabilisation or protection materials**

##### **Rock deposits**

A total of 33, 384 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

##### **Concrete mattress deposits**

A total of 344 concrete mattresses, each measuring 6 metres x 3 metres x 0.5 metres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

##### **Rock filter units**

A total of 74 4 tonnes rock filter units. (The number of rock filter units deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

#### **4 Location of pipeline and stabilisation or protection materials**

Within an area's as described in the application.

#### **5 Prevention of pollution**

The holder of the screening direction must ensure that appropriate measures are



taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

## **6 Inspections**

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

## **7 Monitoring**

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

## **8 Check monitoring**

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

## **9 Atmospheric emissions returns**

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

## **10 Deposit returns**

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.



## **11 Unauthorised deposits**

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

## **12 Screening direction variation**

In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

## COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

### Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

#### **Leman PL23 Pipeline Stabilisation Deposit Consents**

There have been several iterations in recent weeks for PA/3457 and PA/3467, as well as this application. OPRED has used the total quantities for the entire remediation operation to inform the screening direction conditions and are satisfied that worse-case quantities have been used.

#### **Greater Wash SPA ( GW SPA)**

OPRED notes that the application fails to assess impacts of the proposed operations on the GW SPA. Whilst the proposed operations alone or in combination are not likely to have a significant effect on the GW SPA. However, there maybe a risk of displacement of red-throated diver, an Annex I interest feature of the GW SPA, from transiting to the location of the proposed works. OPRED therefore advise that the following best practice is adopted:

- Avoiding works during sensitive period 1st November - 1st March of any given year;
- restricting vessel movements where possible to existing navigation routes (to areas where RTD are likely to be lowest);
- maintaining direct transit routes (to minimise transit distances through areas used by divers);
- avoidance of over-revving of engines (to minimise noise disturbance); and,
- ensure vessel operators aware of the importance of the species (tool box talk), avoiding rafting birds either in-route from operational port and where possible avoid disturbance to areas with consistently high diver density.

#### **Long-term management of pipeline remediation**



Given the increasing requirements for pipeline remediation, by Perenco, within Marine Protected Areas (MPAs), which are designated for benthic habitats and species, OPRED would like to discuss an approach to the longer-term management of Perenco's permanent deposits within the sandbank MPAs.

### **Sufficiency of survey evidence**

OPRED and its consultees are still of the opinion that insufficient survey evidence was presented in the screening direction (variation) to allow the best provision of accurate and meaningful advice. While it is recognised that it is unlikely that survey-based data can be expanded upon for this application, the following may provide a better understanding of what is considered necessary in an application:

Survey data should at least include the area of proposed operations, unless justification is provided as to why wider area surveys are sufficiently representative of conditions at the site of proposed operations.

Survey data should provide adequate evidence that habitats and species of nature conservation concern (including Annex I habitats) are or are not present.

It is good practice to include a diagram indicating the surveyed area in the context of the proposed activity and to identify any sample points or the location of photographic evidence. Data provided should also include high resolution acoustic data, video and / or still images.

### **Sufficiency of site-specific evidence**

OPRED and its consultees is also of the opinion that insufficient site-specific evidence was presented in the application.

As per BEIS guidance, the environmental description should focus on that of the actual area of the proposed operations and not just provide a generic description of the local environment. Evidence should be presented within the application confirming that the data are still relevant.

Any gaps or limitations in environmental information should be acknowledged with, where appropriate, strategies to address these gaps or limitations.

While environmental description should focus on the proposed site of operations, this area should also be placed in the context of its surroundings.

### **Assessment of Potential Significant Impacts and Mitigation**

OPRED and JNCC would like to better understand how Perenco reached the Sensitivity, Recoverability, Resistance, Resilience and Magnitude of Impact ratings associated with benthic communities and Marine Protected Areas. We would like, where possible, to see justification for conclusions reached including reference to relevant scientific evidence.

We advise that the conservation advice packages including the Conservation Objectives (COs), Advice on Operations (where available) and Favourable Condition



Status of these designated sites are considered in any assessment.

**Quality of Application (for note only)**

The commencement date quoted on page 1-2 is no longer current.

The number of RFUs to be used seems to be incorrectly quoted on page 5-1.

The number of RFUs will be 84 whereas the EIAJ states a total of 74.

The seabed impact in NNSSR SAC is incorrectly calculated in Table 5.3 and throughout the document. The impact stated is 4548.1m<sup>2</sup>, however, given the deposits in areas 1, 2, 7, 9, 10, 11 and 12 will all be within the site the actual impact on NNSSR SAC is 4746.1m<sup>2</sup>.

3) All communications relating to the screening direction should be addressed to:

**Out-of-hours emergency screening direction variations:**

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

**Routine communications**

bst@beis.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning  
Department for Business, Energy & Industrial Strategy  
AB1 Building  
Crimon Place  
Aberdeen  
AB10 1BJ

Tel [REDACTED]

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## **SCHEDULE OF SCREENING DIRECTION DECISION REASONS**

### **PL23 Pipeline Remediation Deposits**

This provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project. It summarises the information considered, the potential impacts and sets out the main reasons for the decision made.

In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

- a) The information provided by the developer.
- b) The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).
- c) The results of any preliminary verifications of the effects on the environment of the project; and
- d) Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

### **Characteristics of the project**

This screening direction (ref: PL/2086/0) relates to a change to the project for which a screening direction was previously given (ref: DEP/1981).

Having regard, in particular, to the matters identified in Schedule 5 1(a) to (g) of the Regulations, the characteristics of the project include the following:

### **Summary of project**

- The deposit of an additional 377 mattresses
- The deposit of an additional 42 Rock Filter Units (RFU)
- The deposit of 33,384 tonnes of inert rock

### **Description of project**

PL23 is a gas export pipeline from Leman AP platform to the Bacton gas terminal and is routinely inspected to monitor the development of exposures and freespans and remediation works on the pipeline are identified and undertaken as necessary. A recent pipeline inspection survey at PL23 completed in March 2021 identified the development of further freespans at several locations created by the collapse of rock berms that were previously installed a number of years ago. Perenco plans to carry out further rock placement to strengthen the historical rock berm sections, to produce a more stable base and prevent further collapse in the near future. In addition to the



proposed rock deposits, Perenco propose to deposit up to 377 additional concrete mattress and 42 additional RFUs at 15 new locations along the PL23 pipeline. The commencement date of operations is the 17th of May 2021 and a completion date for 30th September 2021.

Freespan correction and the prevention of pipeline buoyancy are essential to ensure pipeline integrity (and prevent pipeline failure) and protect the safety of other users of the sea. Fishing vessels are particularly vulnerable to snagging hazards such as these and remediation works will minimise the risk considerably by reducing the height and length of the identified spans to within acceptable limits (no longer than 10 metres in length and no higher than 0.8 metres).

No significant cumulative impacts are expected to occur between this project and other existing projects.

It is not considered to be likely that the project will be affected by natural disasters, or unplanned major accident scenarios and there is no risk to human health.

### **Location of the project**

Having regard, in particular, to the matters identified in Schedule 5 2(a) to (c) of the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows.

The PL23 pipeline is in the southern North Sea and connects the Bacton Gas Terminal on the North Norfolk Coast to the Leman AD platform in UKCS Block 49/27. The route of the PL23 pipeline crosses UKCS Blocks 48/30, 49/26, 49/27, 52/3, 52/4 and 52/5. At its closest point the PL23 pipeline is located approximately 59 km west of the UK / Netherlands median line. The project is within the area of the already developed Inde and Leman fields. The water depth in the vicinity of the deposit areas vary between 12 and 40 m and the seabed sediments are coarse sands with gravels. The faunal communities found in the area are those typically associated with sublittoral coarse sediment, sand, mud, and mixed sediments. Characterising species generally include the polychaetes *Ophelia borealis* , *Polycirrus* , *Lagis koreni* , *Scoloplos armiger* and *Nephtys cirrosa* , and the amphipod *Bathyporeia guilliamsoniana* . The whole area is faunally heterogeneous on a small spatial scale, and infaunal communities are similar between nearshore and offshore sandbanks, and between crest, flanks, and troughs.

The project location is within the marine protected areas; North Norfolk Sandbanks and Saturn Reef (NNS) Special Area of Conservation (SAC), with sub-tidal sandbank and reef features and within the Haisborough Hammond and Winterton (HHW) SAC which is designated for the protection of Annex 1 habitat (reef features), the Greater Wash Special Protection Area (SPA) and the Southern North Sea SAC, designated for harbour porpoise.

No areas of *Sabellaria spinulosa* reefs were identified during the pipeline inspection surveys. In addition, the deposits will be made in areas where the pipeline and some



existing deposits are already in place, therefore the potential impact on undisturbed sediments has been kept to a minimum.

Approximately 9.5 km of the PL23 pipeline route is Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ), which has been designated for the protection of seabed features, such as chalk beds. No deposit locations are within the MCZ.

Harbour porpoise and white-beaked dolphin have been sighted in the area with surveys indicating that there is an increased potential of cetacean presence in May, June, August and September.

Peak spawning for mackerel, *nephrops* and sprat may coincide with the project works. The project area is not within a commonly fished ground and fishing effort is historically very low.

Oil and gas activity in the vicinity of the project is high and the Inde and Leman areas of the SNS have extensive oil and gas infrastructure. The closest offshore wind farm, North Vanguard West, is located approximately 15km to the south west and is currently in the planning stage. Due to the proximity of key ports around the Norfolk and Lincolnshire coasts, the density of shipping traffic is high in the southern North Sea but low at the project location itself.

The nearest Royal Airforce Practice and Exercise Area (PEXA) is approximately 17 km north of the pipeline. It is not considered to be likely that this will be affected by the project. There are no active dredging or dredge disposal sites or charted wrecks.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely be affected by the project.

### **Type and characteristics of the potential impact**

In accordance with Schedule 5 paragraph 3 of the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects on the environment from the activities associated with the project were assessed, including impacts arising from physical presence of a vessel on location and seabed disturbance.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

The physical presence of the single vessel involved will not have an exclusion area, however the vessel will be subject to navigational provisions and able to move away in an emergency. The project is in a very low-level fishing area and so the impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions impacts are not considered to be significant.

The overall remediation programme has the potential for the deposit of up to 33,384



tonnes of rock, 434 concrete mattresses and 74 RFUs along the pipeline, including those described for this project. This will cause seabed disturbance and loss of soft sediment habitat in an area of up to 12,470.2 m<sup>2</sup> along the pipeline corridor (e.g., some deposits will be laid on the pipeline and on previous deposits). This is a conservative estimate as it assumes that all the deposit material will be used, including contingency amounts. This is a relatively small area compared to the wider southern North Sea with similar soft sediment habitat. The total area of impact within each marine protected area is 0.0045481 km<sup>2</sup> for the North Norfolk Sandbank and Saturn Reef SAC; 0.0012996 km<sup>2</sup> for the Haisborough Hammond and Winterton SAC; and 0.0121057 km<sup>2</sup> for the Southern North Sea SAC which equates to 0.00026%, 0.000089% and 0.000033% of the area of each MPA respectively.

The placement of the deposits will have a permanent impact on the local sediment faunal communities, potentially smothering any flora and fauna directly beneath it. No notable species of conservation importance (i.e., areas of *Sabellaria spinulosa* reefs) were identified during the recent pipeline inspection surveys. In addition, the deposits will be made in areas where the pipeline and some existing deposits are already in place, therefore the impact on undisturbed sediments has been kept to a minimum. Given the above, it is not anticipated that the proposed deposits will significantly reduce the extent and distribution of subtidal sandbank communities or reef aggregations across the North Norfolk Sandbanks and Saturn Reef SAC, Haisborough Hammond and Winterton SAC. The structure and function of the sandbanks will also not be significantly adversely impacted by the pipeline deposit operations. The proposed placement of deposits is also not likely to significantly adversely impact harbour porpoise in the SNS SAC.

There are no expected transboundary impacts because of the project and no significant cumulative impacts have been identified given the other known approved projects in the wider area.

## Decision

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

## 2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not applicable for the proposed activities.