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Offshore Petroleum Regulator
for Environment & Decommissioning

ODE ASSET MANAGEMENT LIMITED
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Registered No.: 11331750

Date: 13th May 2021

Department for Business, Energy
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Dear Sir / Madam

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

A screening direction for the project detailed in your application, reference PR/2093/0 (Version 6), dated 13th May 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.

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**

Southwark Platform

PR/2093/0 (Version 6)

Whereas ODE ASSET MANAGEMENT LIMITED has made an application dated 13th May 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: 13th 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 14 May 2021 until 31 July 2021.

2 Surface Installation Placeholder

Surface installation placeholder.

3 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.

4 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.

5 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.



6 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.

7 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).

8 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:

The frond mattresses must be removed at the time of decommissioning, if not before.

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]

Fax [REDACTED]



SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, 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:

The information provided by the developer.

The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).

The results of any preliminary verifications or assessments of the effects on the environment of the project; and Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the Project

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

Summary of the project:

The installation of the Southwark platform including the use of scour protection, anchors and the mooring lines associated with the Heavy Lift Vessel (HLV).

Description of project:

The installation of the Southwark platform was assessed in the Blythe Development Hub Environmental Statement (ES) which was approved on the 29th April 2020 (D/4208/2018).

This Screening Direction is required due to a change to the associated Schedule 1 project (to which SoS has already given agreement) as the use of scour protection, the use of anchors and the mooring lines associated with the HLV were not assessed in the ES.

This Screening Direction relates to the construction of a surface installation for extraction of oil and gas (four-legged jacket platform suctioned piled into the seabed).



The project includes the construction of the platform including the use of scour protection on the suction buckets in form of the deposit of 32 fronded mattresses, the use of anchors and the mooring lines associated with the HLV being used for the construction of the platform. Operations are expected to last a total of 4 days and are expected to commence from 14 May 2021.

The Seaway Strashnov HLV will be used to install the platform on to the seabed. It will be positioned at the site using eight anchors. When the platform is placed on the seabed a suction levelling operation will be undertaken, whereby the weight of the platform forces the four 'feet' to penetrate the seabed. The HLV anchors and mooring chains will be removed after the installation of the platform.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The developer has control measures in place to reduce the risk of an unplanned release occurring and the probability of such an event occurring is very low.

No cumulative impacts are expected to occur with any other existing or approved projects.

It is not considered to be likely that the project will be affected by natural disasters.

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

Location of the Project

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

The project area is in Block 49/21 in the southern North Sea (SNS) in an approximate water depth of 29 metres (m), approximately 55 kilometres (km) east of the UK coastline and 65 km west of the UK/Netherlands median line. The project area is located within North Norfolk Sandbanks and Saturn Reef (NNSSR) Special Area of Conservation (SAC), and the Southern North Sea SAC. The Greater Wash Special Protected Area (The Wash) (SPA) is 36km southwest.

The project is in an area characterised by circalittoral fine sand (fine sand and medium sand with shells and shell fragments). The site lies within a group of linear ridge sandbanks. The banks are 'active', as they are progressively elongating in a north-easterly direction and are generally asymmetric with a steeper face to the northeast.

The quantitative assessment of seabed imagery obtained during the survey indicated that the species abundance and diversity was very low. Benthic communities within sandy mobile sediments of the SNS are typically low in both numbers of taxa and individuals and dominated by species adapted to a degree of physical disturbance



associated with tidal movement and wave action. Broken Sabellaria spinulosa tubes were collected in a few grab samples within the survey area but no intact Sabellaria spinulosa tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of Sabellaria spinulosa that could be classified as 'reef' (i.e., not an Annex I habitat) within the surveyed area. Species diversity appeared to increase in areas of coarser sediments (favouring epilithic attachment). Epifauna was generally sparse throughout the survey area.

The fishing effort in the area (ICES 35F2) is rated low. Fish spawning and nursery activity will occur in the area, which may coincide with the operations. However, operations will be undertaken out with the herring and sandeel spawning period. Spawning intensity for sandeels in the area is low.

Harbour porpoise, and atlantic white-beaked dolphin have been recorded in the vicinity. Densities of these species range from high to low throughout the year. Common seal and the grey seal are resident in the SNS, and the Wash and NNSSR, provides ideal breeding site and haul out conditions, located 67km southwest of the operation area. Common seals usually feed within 50km of their haul-out site and therefore may be observed within the operational area Grey seals usually feed within 100km of their haul-out site and therefore may be observed within the operational area, however it is estimated that they only spend 12% of their time at distances greater than 50 km from the coast. Seabird vulnerability is extremely high from November to February, very high in March and April and low from July to September.

Shipping density in the area is high to the north and north west of the Southwark site. In-field traffic at Southwark is mainly associated with the Leman Alpha gas production platform complex, 7.4km south of the operational area. Fishing activity is identified in the areas surrounding the operational area, but the major traffic is associated with general shipping and passing vessels. The project location is within the East Offshore Marine Plan area, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites have been identified within 40km of the operation.

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

Type and characteristics of the potential impact

In accordance with paragraph 3 of Schedule 5 to 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 atmospheric emissions, seabed disturbance, physical presence, planned discharges and accidental spills. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.



A 500m exclusion zone will be located around the Southwark platform excluding unauthorised access of vessels and prohibiting access to fishing vessels. There are no navigational concerns in relation to the proposed location, and no objections were received from the navigational consultees. The temporary placement of the anchors and associated mooring lines will be out with the 500m zone, however there will be a guard vessel on patrol, and the anchors and chains will only be present for a period of four days. The impacts of the anchors and platform on commercial fisheries are not anticipated to cause a significant effect.

Power generation by the associated vessels (HLV, anchor handling vessel, cargo barge, guard vessel, tug vessel) will result in the emission of gases to the atmosphere, however it is expected the emissions will be rapidly dispersed and are not likely to have a significant impact.

The cetacean density for Atlantic white-beaked dolphin, and harbour porpoise (Annex II species), during the operational period (May to July), is low for Atlantic white-beaked dolphin in May and high for harbour porpoise in July only, moderate in June and low in May. The proposed operations are unlikely to have a significant impact on these species. Due to the distance of the operational area from shore, harbour seals and grey seals (Annex II species), are not likely to be encountered regularly at the operational area. As the platform will be installed using suction footings, as opposed to piling, this will significantly reduce the expected noise impacts. The sound generated during the operation is anticipated to be localised and short-term. Very high frequency species such as harbour porpoise are unlikely to be affected, although they may show avoidance behaviour during the 4 day duration of the operation. The impact of sound generated is therefore not anticipated to significantly impact the conservation objectives of the SNS SAC. Prey associated with the diets of harbour porpoise are also unlikely to be significantly impacted by the operations.

Broken Sabellaria spinulosa tubes were collected in a few grab samples within the survey area but no intact Sabellaria spinulosa tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of S. spinulosa that could be classified as 'reef' within the surveyed area. No evidence of any potential Annex I Habitats have been found in the vicinity.

As a worst case, the area of the seabed likely to be impacted by the operations is estimated to be 0.0343 km². This includes the physical siting of the platform (including scour protection) which will impact a total area of 0.0013 km², and the temporary placement of the anchors and mooring chains which will impact an area of 0.0330 km². The suction cans, placement of anchors and mooring lines will create sediment suspension which will be confined to the immediate vicinity of the project location. The North Norfolk Sandbanks and Saturn Reefs SAC is 3,603.41km² and the SNS SAC is 36,951km². It is therefore anticipated that the seabed impact from the operation is likely to be restricted to approximately <0.001% of the total North Norfolk Sandbanks and Saturn Reefs SAC area. The area of seabed impacted by the anchors and associated mooring lines is expected to recover rapidly following



removal due to the hydrographic conditions in the Southern North Sea. The impacts on benthic fauna from the physical siting of the platform, the scour protection and the temporary placement of the anchors and mooring chains will be localised and not considered to have a significant effect. The scour protection in the form of fronded mattresses will be removed at the time of decommissioning.

Only one chemical is required to be used and discharged during operations (for platform cleaning). This has been assessed and is not considered to have a likely significant effect on the environment.

There are no expected transboundary effects from the operations due to the localised and temporary nature of the disturbance and the 65 km distance from the UK/Norway Median Line. It is not considered likely that any planned operational discharge will be detectable at this distance from the project location.

Although not a planned activity, an unplanned release of diesel from a vessel was assessed. The developer has mitigation and control measures in place to prevent such. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low.

There is no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites within the vicinity of the proposed operations. The operations are in accordance with the East Offshore Marine Plan's objectives and policies.

It is considered that the construction and installation of the Southwark platform is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

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

Not applicable.