

Our Ref: 01.01.01.01-4908U  
UKOP Doc Ref:1179584



Offshore Petroleum Regulator  
for Environment & Decommissioning

SHELL U.K. LIMITED  
SHELL CENTRE  
LONDON  
SE1 7NA

Registered No.: 00140141

Date: 10th December 2021

Department for Business, Energy  
& Industrial Strategy

AB1 Building  
Crimon Place  
Aberdeen  
AB10 1BJ

Tel [REDACTED]

Fax

[www.gov.uk/beis](http://www.gov.uk/beis)  
[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  
LEMAN TO BACTON PIPELINE ROCK DEPOSIT  
PIPELINES PL25 AND PL121**

I refer to your amended application dated 10th December 2021, reference PL/2204/1 (Version 1).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, 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**

**LEMAN TO BACTON PIPELINE ROCK DEPOSIT  
PIPELINES PL25 AND PL121**

**PL/2204/1 (Version 1)**

Whereas SHELL U.K. LIMITED has made an application dated 10th December 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: 10th December 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 6 December 2021 until 30 April 2022.

#### **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

11,500 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).

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

Within an area 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**

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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.

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## 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:

N/A

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]



## **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. It summarises the information considered, the potential impacts and sets out the main reasons for the decision made.

#### **Characteristics of the Project**

Having regard to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project are as follows.

- Deposit of stabilising rock material to mitigate free spans on two pipelines (PL25 and PL121) between Leman Alpha installation and Bacton onshore.

#### Description of project

The pipelines are a Gas export pipeline (PL25) and a MEG pipeline (PL121). These pipelines are approximately 48km in length and are subject to annual inspections. The 2021 inspection identified a number of areas where potential free spans existed, and priority areas were identified for remediation. Several options were considered for remediation and rock deposit was the option selected as the most appropriate option, with up to 11,500 tonnes of rock to be used.

The placement of rock will be undertaken from a marine vessel using a fall pipe to accurately position the rock. It is expected that the deposit of rock will be undertaken in December 2021 although the direction is valid until the 30 April 2022 to allow for operational and weather delays. It is expected that activities will be completed within 10 days. The maximum area of impact will be 0.01450km<sup>2</sup>

No significant cumulative interactions are foreseen with any other existing or approved projects.

Divers will be used to assist with rock positioning but otherwise there is no risk to human health from the works to deposit the stabilising rock material on the seabed.

There is no credible potential for a major accident or disaster to affect this project.

Any wastes associated with the project will be handled in accordance with a waste management plan and no significant impacts are anticipated.





## Location of the Project

Having regard 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.

Pipelines PL25 and PL121 are located in the Southern North Sea and travel between the Leman Alpha installation and the Bacton onshore gas terminal. Water depths along the length of the pipelines ranges from 34 m to land onshore. The predominant regional current in the area is south-easterly, with north-easterly currents travelling adjacent to the continental coastal water.

Site-specific surveys identified the seabed as comprising rippled sand with areas of rock cover on the existing pipeline. The survey results revealed a dense community of fauna in both sand and rock-introduced areas. Occasional aggregations of *Sabellaria spinulosa* were observed, however the densities at which they were noted and their presence within rock-introduced habitat meant that they would not be recognised as a protected reef-forming habitat aggregation. The majority of the recognised reef areas of the site are to the south west of the protected area boundary, which is more than 40 km from the location of the works. The project works are located within the footprint of one of the sandbanks protected by the site boundary.

The project works may take place during spawning periods for sandeel, Norway lobster, whiting, lemon sole, cod and plaice. Sightings of harbour porpoise have not been recorded during the period for which the project works are planned. The project area is not within a commonly fished ground and fishing effort is historically very low. There is a large amount of other oil and gas infrastructure in the surrounding area, the project location is not within a military activity zone, and the closest renewable wind farm is located approximately 26 km to the northwest.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to 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 impacts on the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from physical presence of the installed deposits and seabed disturbance resulting from the deposit of those materials.

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

The loose rock used to remedy the pipeline span, support the pipeline, and protect it



from future erosion and fishing gear interaction will be placed under and on the pipeline using a fall-pipe from the vessel. Rock was chosen as the most appropriate material for the works given the urgency of the project and the availability and appropriateness of other alternatives. Precision in placement of protective rock will be ensured via a post-rock installation survey. The affected seabed area has been calculated based on the rock covering a 10 m corridor along the pipeline with disturbed sediment fall-out contained within an additional 10 m corridor.

The total area of seabed impacted will be 0.01450km<sup>2</sup>. The main impacts expected are from smothering and change of habitat. In areas of the pipeline that will be subject to rock deposit within the North Norfolk Sandbanks and Saturn Reef (NNSSR) SAC there are identified areas of sabellaria spinulosa. For the purposes of this impact assessment, it was assumed that all of the rock placement within the NNSSR SAC could impact the reef system in the SAC. However, it is expected that only two of the rock berms could be placed directly onto areas of sabellaria spinulosa reefs. Using the worst case scenario the potential impact on sabellaria spinulosa reefs would equate to 0.0012% of the total known reef area in this SAC. The impacts are therefore not expected to be significant. Considering the very small area of seabed to be impacted by the works, the impact to spawning fish species is not expected to be significant.

The sandbank system within the protected site is not expected to be compromised as the small area impacted by the introduction of hard substrate will not affect the sediment transport and development of the wider sandbank system. Further, the introduction of loose rock will be on an area of pipeline and seabed previously protected by rock, so the majority of seabed impacted will have previously been occupied by rock. The seabed disturbance will impact 0.0004% of the Haisborough, Hammond and Winterton SAC and 0.00019% of the NNSSR SAC. The conservation objectives of the sites will not be compromised by the project, given the expected recovery from seabed disturbance and will therefore not have a likely significant effect on the environment. In addition, the proposed remediation works are not considered to pose any risk of significant effect on the Southern North Sea SAC, impacting 0.00002% of this SAC.

Atmospheric emissions are likely from the combustion plant on the vessels involved in the pipeline works. Work plans have been optimised through planning to reduce reliance on supply materials to the vessels. Emissions measured as carbon dioxide equivalents attributed to the project when compared to the offshore industry as a whole are approximately 0.005%. The atmospheric emissions impact on the environment from the vessels, is not considered to be significant.

The physical presence of the vessels involved with the work programme will not have an exclusion area attributed to them and would be able to move away from location 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.

There are no expected transboundary impacts as a result of the project, and the project only contributes insignificantly (0.00002%) to the cumulative impacts that



have been identified given the other known existing and approved projects in the wider area.

Noise from vessel use will be of short duration and in an already busy shipping area. Consequently, there is no significant impact expected on harbour porpoise populations.

Taking all the above determinations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment.

## **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:

N/A