Our Ref: 01.01.01.01-4582U
UKOP Doc Ref:1182871

Offshore Petroleum Regulator
for Environment & Decommissioning

ODE ASSET MANAGEMENT LIMITED
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Registered No.: 11331750

Date: 23rd December 2021

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

www.gov.uk/beis
bst@beis.gov.uk

Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020
BLYTHE 48/23

A screening direction for the project detailed in your application, reference PR/2209/0 (Version 4), dated 22nd December 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

Signature Not Verified
Digitally signed by Environmental Section
Date: 2021.12.23 16:47:40 GMT
Reason: On behalf of the Department for Business Energy and Industrial Strategy
Location: The Department for Business Energy and Industrial Strategy

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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

BLYTHE 48/23

PR/2209/0 (Version 4)

Whereas ODE ASSET MANAGEMENT LIMITED has made an application dated 22nd 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: 23rd December 2021

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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

This screening direction shall be valid from 23 December 2021.

2 Production level(s)

The holder of the screening direction shall ensure that the level(s) of production do not exceed the level(s) detailed in the application for the screening direction, and in the application for consent relating to the approval for the getting of petroleum issued under the relevant production licence Model Clause.

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.

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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:

The Department has no comments at this time.

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

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:

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 or assessments 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 PR/2209/0) relates to a change to the project for which a screening direction was previously issued (PR/2092/0).

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 :

- Commencement of production and short term vent consent.

Description of project :

This Screening Direction (PR/2209/0) is required due to a change to the associated Schedule 1 project (to which SoS has already given agreement). It relates to the commencement of production as the production profiles have changed slightly from those that were assessed in the associated ES. Venting is also required to depressurise the topsides for annual maintenance which will involve an annual leak test of the riser valves which will in turn require depressurisation of the topsides production manifold and venting to atmosphere. Also, the associated export pipeline

system will need to be dewatered, and therefore back-gassing of the pipeline will be undertaken. The pipeline will be inerted with nitrogen and hydrocarbon gas will then displace the nitrogen and these gases will be vented at the platform. This will be a one-off activity.

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

The earlier Screening Direction (PR/2092/0) related to the surface installation for extraction of oil and gas including the use of anchors and the anchor chains associated with the HLV, in association with the installation of the platform. The project consisted of the installation of the Blythe platform (a mono tower with three feet suctioned piled into the seabed). Operations were expected to last a total of 4 days from 14 April 2021.

The Seaway Strashnov HLV was used to locate the platform on to the seabed and positioned at the site using eight anchors. When the platform was placed on the seabed a suction levelling operation was undertaken, whereby the weight of the platform forces the three 'feet' to penetrate the seabed. The HLV anchors and mooring chains were 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 located in Block 44/23 in the southern North Sea (SNS) in an approximate water depth of 23 metres (m), approximately 36 kilometres (km) north east of the UK and 107 km west of the UK/Netherlands median line. The project area is not located within any protected areas. The closest protected areas are:

- North Norfolk Sandbanks and Saturn Reef (NNSSR) Special Area of Conservation (SAC) 15.6km away

- Southern North Sea SAC 19.9km away

- Greater Wash Special Protected Area (SPA) 25.6km away

- Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ) 25.6km away

- Haisborough, Hammond and Winterton SAC 27.1km away

- Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (SAC) 28.9km away, and

- Wash and North Norfolk Coast SAC 30.6km away.

The project is in an area characterised by circlittoral coarse sediment (gravelly sand with shell fragments) and mobile bed forms (sand waves and mega-ripples). The quantitative assessment of seabed imagery obtained during the survey indicated that the species abundance and diversity were typical of the SNS. 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. No sensitive epifaunal species were identified near the platform location.

The fishing effort in the area (ICES 35F1) is rated low and medium for shellfish. Fish spawning and nursery activity will occur in the area, which may coincide with the operations. However, operations will be undertaken outwith the herring and sandeel spawning period, and the area has been considered as 'unsuitable' for herring spawning habitat. Spawning intensity for sandeels in the area is low.

Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided 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 North Norfolk Coast SAC, provides ideal breeding site and haul out conditions, located 30.6km 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 very high from October to February (extremely high in four surrounding Blocks), high in March, April and August, moderate in September, and low from May to July.

Shipping density in the area is very high. A significant portion of vessel activity appear to be attributed to appearing to be a result of the Dudgeon Offshore windfarm which routes vessel traffic around its south western edge. 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 Blythe 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 outwith 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 vessels associated with the installation of the platform (HLV, anchor handling vessel, cargo barge, guard vessel, tug vessel), and power generation to the platform will be supplied by a small diesel generator. The one-off activity of venting emissions associated with the back-gassing of the pipeline at Blythe contribute 0.0066% of the total atmospheric emissions associated with UK oil and gas activities in a year. The annual emissions from the Blythe platform which include supply vessels, power generation and venting during maintenance have been calculated to contribute 0.0032% of the total atmospheric emissions associated with UK oil and gas activities in a year. Although cumulatively the project will contribute to GHG emissions, the contribution is very minor. The non-routine emissions are in this instance unavoidable, but temporary in nature. it is expected the emissions will be rapidly dispersed and are not likely to have a significant impact on local air quality. The effect from emissions is deemed to not have a significant effect on the environment.

The cetacean density for Atlantic white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise (Annex II species), during the operational period (April to July), are low to moderate for Atlantic white-beaked dolphin and harbour porpoise, high for harbour porpoise in July only and low for Atlantic white sided dolphin in August. 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. Any noise generated during operations is expected to be within local background levels.

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. The nearest Annex I habitat 'Sandbanks which are slightly covered by seawater all of the time' is 15.6km from the location of the operational area (NNSSR).

The physical siting of the platform will impact a total area of 542m2. The temporary placement of the anchors and mooring chains will be 28,295m2. The total seabed footprint is 28,837m2. No additional rig stabilisation material is required. 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 area of seabed impacted by the anchors and associated 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 and the temporary placement of the anchors and mooring chains will be localised and not considered to have a significant effect.

The discharge of associated production chemicals have been assessed and are 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 107 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.

The Dudgeon offshore wind farm is operational and is approximately 0.09km from the drill site and the project is not considered to have any significant in-combination impacts. There are no planned construction operations, 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 installation of the Blythe 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

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