

7 February 2019

Marine Scotland Licence
and Operations Team.

Inch Cape Offshore Wind Farm Site Investigation - European Protected Species and Marine Licence Variation

Dear MS-LOT,

Inch Cape Offshore Wind Limited (ICOL) is writing to request a variation to European Protected Species (EPS) Licence Number MS EPS 16 2018 which was granted for the purposes of undertaking geophysical survey activity within the Inch Cape Offshore Wind Farm and Offshore Export Cable Corridor boundary. ICOL would also like to seek a variation of Marine Licence 06738/18/1 (variation dated 10th July 2018) which was granted for the purpose of undertaking geotechnical survey within the Inch Cape Offshore Wind Farm and Offshore Export Cable Corridor boundary.

Site Investigation works (consisting of both geophysical and geotechnical works) progressed between July and November 2018. During this period, geophysical survey was undertaken and used to inform the geotechnical campaigns borehole target locations. Survey work was paused at the end of November due to increasingly poor weather. It is ICOLs intention to complete Site Investigation works in 2019.

Further to this, during the 2018 campaign an anomaly of unknown origin was detected which ICOL would like to investigate in greater detail to determine whether the anomaly is anthropogenic or natural in origin. In order to determine this it is necessary to modify the scope of the geophysical survey. This letter outlines the changes that are required and requests variations to the corresponding EPS Licence and Marine Licences that were granted for the survey.

European Protected Species Licence – Licence MS EPS 16 2018

Licene EPS 16 2018 was granted for the undertaking of geophysical survey within the Inch Cape Offshore Wind Farm and Export Cable Corridor. The EPS licence allows;

Inch Cape Offshore Limited is a company registered in Scotland with registration number SC373173 whose registered office is at 5th Floor, 40 Princes Street, Edinburgh, EH2 2BY with VAT number GB115073645. Inch Cape Offshore Limited is a wholly owned subsidiary of Red Rock Power Limited.

'the use of geophysical survey equipment, including sub-bottom profiler, single beam echo sounder, ultra short baseline positioning system and beacons' and is valid from '01 July 2018 to 31st August 2019'.

An EPS Risk Assessment and Supplementary Information to support an exemption (ICOL, 01/08/2018) was provided to support the EPS Licence Application.

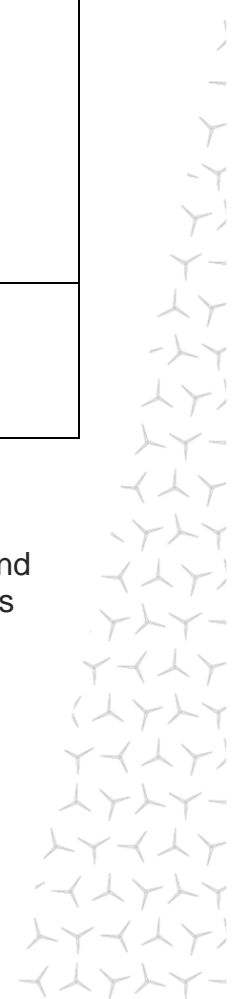
Variation Requirements to the existing licence

ICOL would like to investigate an anomaly that was detected during the 2018 section of the campaign. In order to do so, ICOL would need to undertake 3-Dimensional Ultra-High Resolution (3DUHR) over sections of the Wind Farm and Export Cable Corridor site in order to establish more information regarding the anomaly and underlying site geography.

It is currently proposed that the same vessel (Geocean III) will undertake the survey, however, in addition to the equipment outlined in the EPS Licence, the following survey equipment would be required to undertake the 3DUHR survey;

Equipment	Method	Frequency Range
Multi Channel UHR	A multi-channel UHR seismic system will be used to investigate and map shallow soil units, to a depth of approximately 100m sub-seabed. The UHR seismic system comprises up to four streamers towed in an array behind the vessel. The streamers will be separated by approximately 4m and be up to 50m in length	Noise receiver
UHR Source : Sparker	The UHR Source will be towed behind the vessel, at approximately 2-5m below sea-surface. Up to 2 Sources may be deployed simultaneously.	500Hz to 2kHz

In total, the duration of this works would be between two and four weeks and would be undertaken prior to the 31st of August which the existing licence is valid for.



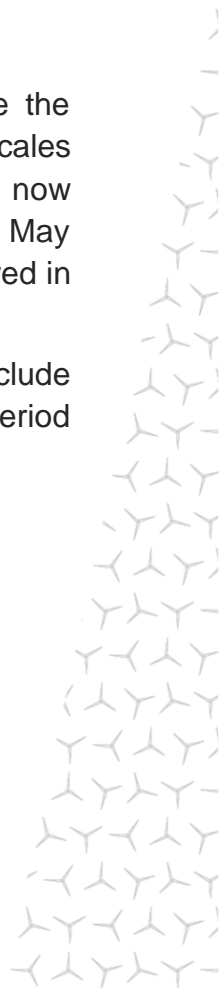
Whilst the equipment outlined above was not included in the EPS Risk Assessment used to support the EPS Licence Application, the same mitigation outlined within the Risk Assessment would be in place ie., the use of Marine Mammal Observers (MMO), Passive Acoustic Monitoring (PAM) and soft-starts. Guidance used to inform the Risk Assessment would still apply and the conclusions of the EPS Risk Assessment (Section 5.2.1) and Supplementary Information remain valid and therefore the conclusion that the risk to EPS (prior to the use of mitigation) would be negligible also remains valid. Given the short duration of the survey and that suitable best practice mitigation will be used, the risk of an offence to EPS is further reduced.

Supplementary Information was provided justification for the exemption of geotechnical survey activities from requiring to be included within the EPS Licence on the basis that there would be no significant impact on the site integrity or interest features of the following Natura 2000 sites as a result of the geotechnical works;

- Berwickshire and North Northumberland Coast Special Area of Conservation (SAC) (grey seal);
- Firth of Tay and Eden Estuary SAC (harbour seal);
- Isle of May SAC (grey seal); and
- Moray Firth SAC (bottlenose dolphin).
- Outer Firth of Forth and St Andrews Bay Complex pSPA; and
- The Firth of Forth Banks Complex MPA.

The technical scope of the geotechnical survey has not changed since the supplementary information was provided, however, due to the timescales required to complete the survey and potential weather restrictions, it is now anticipated that the geotechnical survey is likely to be undertaken between May and September 2019, rather than completion by the 31st of August as allowed in the current EPS Licence.

ICOL therefore request an update to the EPS Licence MS EPS 16 2018 to include the additional survey equipment and an extension of the licence validity period for an additional 1 month, until the 30th of September.



Marine Licence 06738/18/1

The scope of the geophysical survey has not changed since the Marine Licence application was granted and the same vessel is proposed, however, it has been necessary to pause geotechnical survey work over the winter/spring due to poor weather and vessel availability. As part of the 2018 section of the campaign, 37 locations were completed, and there are up to 42 outstanding locations to be sampled.

It is proposed that geotechnical survey will re-commence in May 2019 using the MV Geobay, however, there is a possibility that works may now extend beyond the 31st of August 2019 which is currently stipulated within the Marine Licence. On this basis, ICOL request an update to Marine Licence ML 06738/18/1 for the licence to be extended by 1 month until the 30th of September 2019.

Yours Sincerely,

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Offshore Consents Manager

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