

# CAITHNESS – MORAY HVDC REINFORCEMENT

## OFFSHORE INSTALLATION CUMULATIVE IMPACT REVIEW

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## Contents

1	Introduction .....	3
2	Review of Noss to Hub ES Cumulative Impact Conclusions .....	4
3	Review of Shetland to Moray EA Cumulative Impact Conclusions .....	6
4	Review of BOWL and MORL ES Cumulative Impacts Assessments .....	7
5.	Caithness – Moray HVDC cable contribution to the overall cumulative impact.....	8
6.	Cumulative impact during installation .....	9
7.	SHE T mitigation measures .....	11
8.	Conclusion .....	12
	Appendix A.....	13
	Appendix B.....	14

### Revision note:

1. New Section 6 added for Cumulative Impact During Installation.
2. Consideration given in Section 6 to simultaneous installation activities by BOWL and SHE T.
3. Reference to cumulative impact during installation removed from Section 5.
4. Appendix B (SHE T, BOWL and MORL installation programmes) added.

## 1 INTRODUCTION

The purpose of this document is to summarise the cumulative impact of the Beatrice Offshore Windfarm Limited (BOWL) and Moray Offshore Renewables Limited (MORL) windfarm developments and Scottish Hydro Electric Transmission plc's (SHE T) Caithness - Moray High Voltage Direct Current (CMHVDC) cable development on commercial fishing in the Moray Firth.

This document forms an addendum to SHE T's Fisheries Liaison Mitigation and Action Plan (FLMAP), SHE T's Socio-economic Assessment, BOWL's Environmental Statement (ES) and MORL's ES. It should be read in conjunction with these documents.

It should be noted that this review does not repeat the work already done by others but instead draws on their findings.

SHE T's CMHVDC cable is critical national infrastructure and, as such, SHE T has determined that the cable requires to be protected along its entire length.

## 2 REVIEW OF NOSS TO HUB ES CUMULATIVE IMPACT CONCLUSIONS

SHE T commissioned Aquatera in 2011 to produce an Environmental Statement (ES) in support of the application for a marine licence for the “Hub to Noss” section of the Caithness – Moray HVDC cable across the Moray Firth. This licence has been granted.

Chapter 11 of the ES (Cumulative and In-combination Issues) sets out possible synergies and antagonisms from the CMHVDC cable, other projects and plans. Table 11.1 below highlights the interactions between commercial fishing and cable infrastructure and notes that the interaction between the Noss to Hub Section of the C-M cable and commercial fisheries as being “possible”. This is a lesser level of interaction than that noted between commercial fishing and offshore wind farms such as BOWL and MORL.

Key	x	?	+?✓	+✓✓	+✓✓✓
	x	?	?✓	✓✓	✓✓✓
	No interaction	Uncertain	Possible interaction	Likely interaction	Certain interaction

Issue/mechanism	Cable infrastructure	Offshore wind farms	PFOV tidal projects	PFOV wave projects	Oil and gas exploration	Conservation	Coastal development
Seabed character changes	✓✓	✓✓	✓✓	✓✓	✓✓	x	x
Water quality changes due to re-suspended sediments	?✓	?✓	x	x	?✓	x	?✓
Seascape changes	x	✓✓✓	✓✓	✓✓	✓✓	x	✓✓
Direct seabed disturbance	✓✓	✓✓	✓✓	✓✓	✓✓	x	?✓
Effects on migrating salmon	x	?	?	?	x	x	x
Disturbance to seabirds offshore	?✓	✓✓	?✓	?✓	?✓	x	?✓
Disturbance to marine mammals from noise	x	✓✓	x	x	✓✓✓	x	?✓
Ecological impacts from spillages of oil and chemicals	x	x	x	x	?✓	x	?✓
Disturbance to commercial fishing	?✓	✓✓	x	✓✓	✓✓	?✓	x
Obstacle to navigation from offshore structures	✓✓	✓✓✓	✓✓	✓✓✓	✓✓	x	x
Obstacle to oil & gas activities	✓✓✓	✓✓✓	x	x	✓✓	✓✓	x
Benefits to the wider renewables sector	+✓✓✓	+✓✓✓	+✓✓✓	+✓✓✓	x	?✓	+?✓
Benefits to the local economy	+?✓	+✓✓	+?✓	+?✓	+?✓	x	+✓✓

Table 11.1 Possible synergies and antagonisms within the current project and with other future projects and plans.

However, this assessment was only carried out in relation to the Noss to Hub section and is therefore not representative of the entire CMHVDC cable route although, it does include the impact from the now discontinued Moray Firth Offshore Hub and the associated 33kV power



supply cable. Thus, the assessment of the impacts on commercial fishing detailed in this document is conservative when compared to the scope of works actually being planned by SHE T.

However, this low level of interaction is consistent with the findings subsequently set out in 2016 in SHE T's Socio-Economic Assessment (for the whole CMHVDC route), which concluded that although there was interaction with fisheries, the likely socio-economic consequences of this was likely to be small.

### **3 REVIEW OF SHETLAND TO MORAY EA CUMULATIVE IMPACT CONCLUSIONS**

SHE T commissioned Entec in 2008 to produce an Environmental Appraisal (EA) in support of their application for a marine licence for the “Shetland HVDC Link”. This licence was granted.

At that time, other developments of significance were considered to be at an early stage in their lifecycle with no formal consenting process having commenced and it was deemed unlikely that any such development would coincide with SHE T's subsea HVDC cable installation. Hence, cumulative effects were not considered likely.

However, SHE T recognises that this snapshot is no longer representative of the developments that are now planned for the Moray Firth. Therefore, the content of this EA is not considered further in this review.

#### 4 REVIEW OF BOWL AND MORL ES CUMULATIVE IMPACTS ASSESSMENTS

BOWL and MORL jointly commissioned ERM in 2011 to produce a Cumulative Assessment Discussion Document (MORL ES Technical Appendix 1.3D) which set out the methodologies that these developments would use to assess and quantify their cumulative impacts.

BOWL's ES assessed the cumulative impacts of developments in the Moray Firth (including SHE T's C-M cable). Section 16.7 details the developments that were considered in the cumulative impact assessment. The output from this assessment is set out within Section 16 of BOWL's ES and broadly states that the impact on commercial fishing in the Moray Firth is expected to be minor to negligible, though it is considered that these impacts are probable. Table 16.8 from BOWL's ES (set out below) illustrates these findings for selected commercial species.

*Table 16.8 Summary of Assessment on Haddock, Scallops and Squid (Operational Phase)*

Effect	Receptor	Predicted Significance	Mitigation Proposed	Residual Effect Significance	Probability
Loss of habitat	All	Negligible	None Proposed	Negligible	Probable
Introduction of new habitat	All	Negative minor	None Proposed	Minor	Probable
Electromagnetic Fields	All	Negligible	None proposed	Negligible	Probable
Operational Noise	All	Negative Minor	None Proposed	Minor	Probable

MORL's ES assessed the cumulative impacts of developments in the Moray Firth (including SHE T's C-M cable). Table 15.1-1 discusses the impacts of individual developments against a variety of receptors. In summary, this notes that there will be moderate displacement of scallop, squid and nephrops fisheries within the wind farm areas and minor displacement of whitefish in the same area. It also notes that the impact will be similarly split for complete loss or restricted access to traditional fishing grounds.

Furthermore, there is no expected cumulative effect on crab and lobster fisheries. Full detail is set out in Section 15.1 of MORL's ES.

## 5. CAITHNESS – MORAY HVDC CABLE CONTRIBUTION TO THE OVERALL CUMULATIVE IMPACT

The assessments carried out by BOWL and MORL, as summarised above, indicate that the cumulative impact of all of the planned developments in the Moray Firth is generally considered to be moderate. However, there are some elements that are considered to be minor or negligible.

SHE T's Socio-economic Assessment describes and quantifies the impacts of the C-M cable on commercial fisheries. These are generally considered to be minor or negligible as set out in Section 3.3.

The table below sets out the impacted areas from each of the projects:

Project	Impacted area, i.e. excluded from mobile gear fishing
BOWL	285,348 m <sup>2</sup> (86 No. foundations x 3,318m <sup>2</sup> - assumed)
MORL (Round 3 Zone worst case)	1,393,689 m <sup>2</sup> (420 No. foundations x 3,318m <sup>2</sup> )
SHE T C-M cable	262m <sup>2</sup> (over the Noss Head MPA)

This indicates that the contribution from the C-M cable to the overall impacted area in the Moray Firth is less than 0.1% of the area impacted by the combination of the BOWL and MORL turbine foundations (excluding inter-array or export cables, the inclusion of which would increase the impacted area). This is based upon mobile gear fishing not being prevented over the C-M cable however, some vessels may choose not to fish over the cable route.

The above is notwithstanding any legislation or conventions in place (detailed in **Appendix A**) that protect subsea telecommunications or high voltage electricity cables from injury, nor does it preclude the vessel master's responsibility to protect the safety and welfare of his vessel and crew.

SHE T would seek to recover the costs of any losses incurred as a result of the injury to the C-M cable from the party responsible for the injury.

## 6. CUMULATIVE IMPACT DURING INSTALLATION

There is a potential for simultaneous activities being carried out by various organisations and these are considered below:

- SHE T and BOWL:

The subsea portions of the SHE T CMHVDC cables and the BOWL AC export cables are relatively close to each other within the first 7.5km off the Moray coastline. At the coastline, the cables are approximately 800m apart and at kp 7.5, the cables are approximately 100m apart. Beyond this, the cables diverge.

Both installation programmes are available and indicate the following:

- SHE T landfall horizontal directional drilling takes place between August 2016 and February 2017. BOWL landfall direct pipe drilling takes place between March and April 2017. There are therefore no expected simultaneous activities relating to the landfall duct installation operations. SHE T will carry out their offshore trenching work in the area off the Moray coastline in April 2017 but this operation is physically displaced from the landfall duct installation operations.
- BOWL will carry out some nearshore backhoe trenching work at the Moray coastline between late June and early July 2017. Immediately prior to this, SHE T will have pulled in their cables through their landfall ducts and, by the date when BOWL commence their backhoe trenching work, will already be approximately 25km away from the Moray coastline. There are therefore no expected simultaneous activities relating to BOWL's nearshore backhoe trenching operations.
- BOWL will carry out a pre-lay grapnel run in July 2017. SHE T will have no operations in the area near the Moray coastline ongoing at that time.
- BOWL will install their first cable circuit in September 2017. SHE T will have no operations in the area near the Moray coastline ongoing at that time.
- BOWL will carry out their cable protection work (post-lay burial) between September and October 2017. SHE T will be carrying out rock protection works where necessary during this time but will be carrying this out at the Caithness end of the Caithness – Moray cable route. There are therefore no expected simultaneous activities relating to BOWL's cable protection operations.

- SHE T and MORL:

The subsea portions of the SHE T HVDC cables and the MORL AC export cables cross each other approximately 40km off the Moray coastline. Furthermore, the SHE T HVDC cables are within 100m of the eastern periphery of the MORL wind farm zone.

Both installation programmes are available and indicate the following:

- MORL's export cable installation activities take place in 2020 i.e. in excess of 2 years after SHE T's cable is put into permanent service. There are therefore no expected simultaneous activities relating to MORL's export cable installation.
- MORL's wind turbine installation activities take place between 2019 and 2021 i.e. in excess of at least 1 year after SHE T's cable is put into permanent service. There are therefore no expected simultaneous activities relating to MORL's wind turbine installation.
- Ardesier redevelopment:
  - This project is on hold pending re-sale. Therefore, potential construction programme overlap is unlikely.
- Nigg Harbour piling:
  - This work was completed in 2015. Therefore, there is no installation programme overlap.



## 7. SHE T MITIGATION MEASURES

SHE T's mitigation measures include:

- routing the cable to optimise burial in sediments;
- establishing a target trench depth at 1.8m;
- determining a minimum depth of cover being 1.0m;
- allowing for up to 0.65m of trench backfill between trenching and cable laying (noting that the cable diameter is 0.15m);
- issuing Notices to Mariners through agreed channels;
- provision of guard vessels during the installation phase;
- surveying of the trench profile, cable placement and mechanical backfill;
- placing rock where surveys indicate that minimum depth of cover has not been achieved;
- final surveying of completed installation; and
- ongoing monitoring of the installation during its operational lifespan.

Scotland's National Marine Plan states the following:

*New cables should implement methods to minimise impacts on the environment, seabed and other users, where operationally possible and in accordance with relevant industry practice.*

*Cables should be buried to maximise protection where there are safety or seabed stability risks and to reduce conflict with other marine users and to protect the assets and infrastructure.*

*Where burial is demonstrated not to be feasible, cables may be suitably protected through recognised and approved measures (such as rock or mattress placement or cable armouring) where practicable and cost-effective and as risk assessments direct.*

It is therefore evident that the mitigation measures detailed above discharge SHE T's obligations in this respect.

## 8. CONCLUSION

The following conclusions can be drawn from the above:

- SHE T acknowledges that the cumulative impact of all planned developments in the Moray Firth will have a moderate impact on mobile gear commercial fishing;
- it is not certain that all planned developments included in the cumulative impact assessment will proceed;
- the timeframes for the delivery of the planned developments other than SHE T's C-M cable are not defined;
- it is not possible to consider cumulative impacts during installation as the programmes for other projects are not available to SHE T, or are not firm;
- the area impacted by SHE T's C-M cable is negligible as a proportion of the total area impacted by BOWL and MORL;
- the mitigation measures that will be implemented by SHE T on the C-M cable are in accordance with the requirements set out in Scotland's National Marine Plan; and
- the mitigation measures that will be implemented by SHE T on the C-M cable are proportionate to its contribution to the cumulative impact of developments in the Moray Firth.

## APPENDIX A

The International Convention for the Protection of Submarine Cables, 1884, as extended by the Convention on the High Seas, 1958 stipulates:

*vessels shall not remain or close within 1 mile of vessels engaged in laying or repairing submarine cables or pipelines, and vessels engaged in such work shall show the signals laid down in the International Regulations for Preventions of Collisions at Sea 1972. Fishing gear and nets shall also be removed to, or kept at, a distance of 1 mile from vessels showing those signals, but fishing vessels shall be allowed 24 hours after the signal is first shown for them to get clear.*

The International Regulations for Preventions of Collisions at Sea 1972 rule 18/c states:

*a vessel engaged in fishing when underway shall, so far as possible, keep out of the way of:*

- (i) A vessel not under command*
- (ii) A vessel restricted in her ability to manoeuvre.*

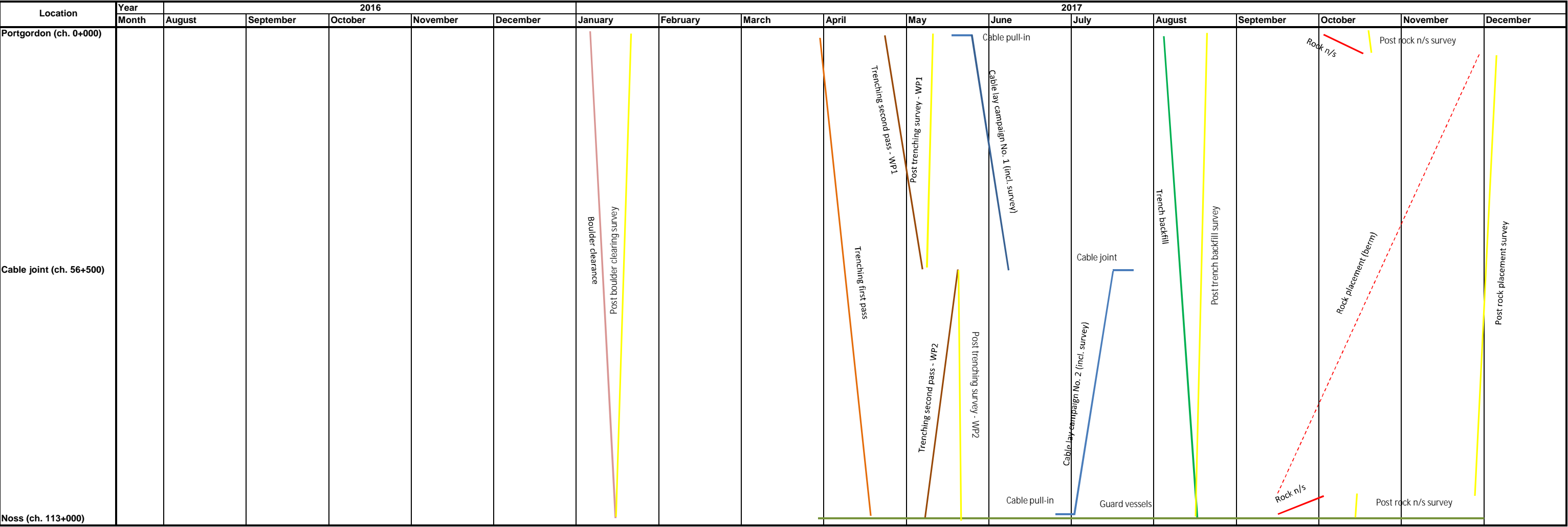
United Nations Convention on the Law of the Sea Article 113 states:

### *Breaking or injury of a submarine cable or pipeline*

*Every State shall adopt the laws and regulations necessary to provide that the breaking or injury by a ship flying its flag or by a person subject to its jurisdiction of a submarine cable beneath the high seas done wilfully or through culpable negligence, in such a manner as to be liable to interrupt or obstruct telegraphic or telephonic communications, and similarly the breaking or injury of a submarine pipeline or high-voltage power cable, shall be a punishable offence. This provision shall apply also to conduct calculated or likely to result in such breaking or injury. However, it shall not apply to any break or injury caused by persons who acted merely with the legitimate object of saving their lives or their ships, after having taken all necessary precautions to avoid such break or injury.*

## **APPENDIX B**





SHE T, BOWL and MORL Installation programmes



Programme dates

Activity	Start date	Finish date	Duration (days)
Boulder clearance	11/01/2017	21/01/2017	10
Post boulder clearance survey	21/01/2017	26/01/2017	5
Trenching first pass	31/03/2017	19/04/2017	19
Trenching second pass WP1	23/04/2017	06/05/2017	13
Post trenching survey WP 1	06/05/2017	08/05/2017	2
Trenching second pass WP2	09/05/2017	22/05/2017	13
Post trenching survey WP 2	22/05/2017	24/05/2017	2
Cable pull-in (Portgordon)	19/05/2017	24/05/2017	5
Cable lay - campaign 1 (incl. survey)	24/05/2017	08/06/2017	15
Cable pull-in (Noss)	26/06/2017	01/07/2017	5
Cable lay - campaign 2 (incl. survey)	01/07/2017	16/07/2017	15
Cable joint	16/07/2017	23/07/2017	7
Trench backfill	03/08/2017	17/08/2017	14
Post trench backfill survey	17/08/2017	22/08/2017	5
Rock placement (berm)	16/09/2017	25/11/2017	70
Post rock placement survey	25/11/2017	06/12/2017	11
Rock n/s (Noss)	16/09/2017	02/10/2017	16
Rock n/s (Portgordon)	02/10/2017	18/10/2017	16
Post rock n/s survey (Noss)	18/10/2017	19/10/2017	1
Post rock n/s survey (Portgordon)	19/10/2017	21/10/2017	2
Guard vessels (varying quantity)	31/03/2017	30/11/2017	244



 Remaining Level of Effort     Milestone  
 Actual Work     Summary  
 Remaining Work  
 Critical Remaining Work



Consortium Baseline Programme			
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# High Level Programme

