

Humphries S (Sophie)

From: Mark Bilsby <mark@riverdee.org>
Sent: 19 January 2017 14:29
To: MS Marine Renewables
Cc: Edwin Third; JNCCAdvicetoDTI@jncc.gov.uk; marineenergy@snh.gov.uk; MS Renewables; Stainer P (Paul) (MARLAB)
Subject: RE: Hywind - PEMP Consultation - Request for Comments by 08th February 2017
Attachments: FW: Dee DSFB's consultation response to the Hywind Scotland Pilot Park Project

Dear Catrina,


The Dee DSFB has agreed with Hywind and Marine Scotland that the monitoring of Atlantic salmon would be an integral part of the PEMP. This removed our concerns relating to the project as it would demonstrate that no damage was being caused to migrating Atlantic salmon smolts. I have included a copy of the correspondence trail between the Dee DSFB, Marine Scotland and Hywind.

The Dee DSFB remains of the opinion that this monitoring remains important. As such we would request that you consider this licencing condition and revert back prior to the February 8th deadline.

Kind regards

Mark

Mark Bilsby
River Director
Dee DSFB and River Dee Trust
River Office
Mill of Dinnet
Aboyne
Aberdeenshire
AB34 5LA


The River Dee Trust is a charity registered in Scotland, No: SC028497

From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]
Sent: 11 January 2017 13:37
To: JNCCAdvicetoDTI@jncc.gov.uk; marineenergy@snh.gov.uk; MS_Renewables@gov.scot; Paul.Stainer@gov.scot; Mark Bilsby <mark@riverdee.org>; Edwin Third <edwin@riverdee.org>
Subject: Hywind - PEMP Consultation - Request for Comments by 08th February 2017

MARINE (SCOTLAND) ACT 2010

MARINE AND COASTAL ACCESS ACT 2009 (AS AMENDED)

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

MS Marine Renewables

From: Sarah.Canning@jncc.gov.uk
Sent: 08 February 2017 11:56
To: MS Marine Renewables
Cc: Catriona Gall
Subject: RE: Hywind - PEMP Consultation - Request for Comments by 08th February 2017

Dear Catarina,

We provided comments on Hywind's environmental monitoring in our note of 16 December, having discussed this with Statoil and MSS at the meeting held 5 December. Further to this advice, our main **recommendation** is for MS-LOT and Statoil to agree on the key project contact for this monitoring work and for any associated liaison and reporting (see also our advice on the operations and maintenance plan).

We have only a few further comments on the content of this plan, as follows:

Bird monitoring

We support Statoil's proposals in this regard: the plan provides further detail on the proposed programme of guillemot and razorbill tracking studies. The programme has been developed by CEH and will provide useful information to develop the knowledge base, feed into Sporrán activities and complement other post-consent seabird monitoring.

We recommend that the plan includes some more explanation of the reasoning behind the adoption of a strategic approach to seabird monitoring. This should ensure transparency and provide a link between the proposed surveys, ES predictions and how this work will help improve our understanding of potential impacts from offshore wind farms.

Note that we disagree with Statoil's opinion about 'traditional' surveys of seabirds at sea, and we do consider that these have a place in post-consent monitoring (such as that agreed for Beatrice). We do, however, concur that such survey may not be suitable for a demonstration project like Hywind (six turbines) as it is unlikely there'd be the power to detect any changes in seabird densities or distributions on-site.

We note that the outputs from monitoring will be fed through to Sporrán and other relevant groups in addition to being published on the Seatrack website (this is discussed in section 7, albeit not in section 2).

Non-native species

Statoil is supporting a PhD to study this issue, to which SNH and MSS are also contributing. We think this should be a valuable piece of work to help inform our understanding of the risks.

Diadromous fish

We re-iterate that there is no requirement for monitoring in relation to diadromous fish from any freshwater SACs. Now that HDD has completed, there are no other pathways to impact on diadromous fish from either construction or operation of the Hywind floating wind farm.

Overall, we consider that this environmental monitoring plan for Hywind satisfies the requirements of condition 3.2.1.1.

Yours sincerely,

Dr Sarah Canning

Offshore Industries Advisor
PhD, BSc (Hons)

Joint Nature Conservation Committee
Inverdee House, Baxter Street, Aberdeen, AB11 9QA
Tel: 01224 266 550
Direct Tel: 01224 266589
Email: sarah.canning@jncc.gov.uk



<http://jncc.defra.gov.uk>



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From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]
Sent: 11 January 2017 13:37
To: JNCC Advice to DTI <JNCCAdvicetoDTI@jncc.gov.uk>; marineenergy@snh.gov.uk; MS_Renewables@gov.scot; Paul.Stainer@gov.scot; mark@riverdee.org; edwin@riverdee.org
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Dear Sir/Madam,

Hywind (Scotland) Limited (“Hywind”), having received consent under the above legislation and in order to discharge conditions of their Marine Licence (Licence Number 05515/16/0), in respect of the Hywind Scotland Pilot Park Project, has submitted to the Licensing Authority the Project Environmental Monitoring Programme (“PEMP”) which you may find attached.

The purpose of the PEMP is to attempt to satisfy the requirements of condition 3.2.1.1 of the Marine Licence issued in October 2015 and varied in November 2016.

The Marine Licence can be found on our website, following the link below:
<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Hywind>

The condition state that the PEMP is to be submitted to the Scottish Ministers for their written approval, following a consultation with the JNCC, SNH, MSS, Dee DSFB and any such other advisors as may be required at the discretion of the Scottish Ministers.

We would appreciate any comments you may have on the attached PEMP and its suitability to discharge the condition 3.2.1.1 of the Marine Licence (Licence Number 05515/16/0), in order to determine whether it is fit for purpose for the Scottish Ministers to give it their written approval. Please note that we do not seek comments on the Marine Licence nor on the conditions, which will not be amended.

If you wish to submit any comments, please do so to MS.MarineRenewables@gov.scot before the **08th February 2017**. If you are unable to meet this deadline, please contact us to arrange an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

Yours faithfully,

Catarina

Catarina Aires
Marine Renewables Casework Manager

Catarina Aires
Licensing Operations Team
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

017/OW/HYWD-11 - HYWIND SCOTLAND PILOT PARK PROJECT – PEMP

Marine Scotland Science (MSS) has reviewed the submitted PEMP and has provided the following comments.

diadromous fish

The developer correctly advises that is required to participate in the National Research and Monitoring Strategy for Diadromous Fish (“NRMSD”) but describes this as an advisory and/or coordination group which it has to participate in. It is more that it has to participate in agreed work to help fulfil the strategy than that it would necessarily be involved in any group.

MSS notes that the developer advises that it consulted the Joint Nature Conservation Committee (JNCC), the Scottish Natural Heritage (SNH) and Marine Scotland Science (MSS) prior to submission of the PEMP, and that it had got written confirmation from JNCC and SNH that the project monitoring in their view should focus on seabird interests.

The developer puts forward (my summary) that

- as impacts on diadromous fish were in general in the Environmental Statement considered to be insignificant,
- as Horizontal Directional Drilling has now been used for the cable landfall as an additional mitigation, and that
- as it believes that the electromagnetic fields now calculated by the cable manufacturer for the static cable are highly unlikely to impact on diadromous fish and other marine life that it does not consider monitoring of potential impacts on diadromous fish to be relevant.

This needs to be discussed further with the developer.

The Marine Licence condition is

3.2.1.6. National Research and Monitoring Strategy for Diadromous Fish (“NRMSD”)

The Licensee must, to the satisfaction of the Scottish Ministers, participate in the monitoring requirements as laid out in the NRMSD so far as they apply at a local level. The extent and nature of the Licensee’s participation is to be agreed by the Scottish Ministers in consultation with the FTRAG.

MSS is not aware of any discussions with Hywind over what will be appropriate for it in the way of participation, and this needs to be urgently progressed by LOT with the involvement of MSS. Appropriate participation might take the form of work or contribution to studies which will assist in improving risk assessment in relation to diadromous fish as put forward in the NRMSD. Such work

need not necessarily be solely relevant to the specific site. MSS notes that the Dee DSFB in its recent response to the PEMP consultation, also considers it important that the Marine Licence condition is complied with. A 2015 email from the DSFB which formed part of an earlier email trail which the DSFB attached, specifically requested that the “Dee DSFB therefore want monitoring of migratory fish movements to be included in the monitoring programme. The exact details of this can be agreed with Dee DSFB post consent.” The Dee DSFB considered that it was if the outline of the monitoring programme was agreed as part of the consenting process that this would address its main concerns. An email from Statoil which formed the start of the email trail indicated that the exact details of monitoring of migratory fish movements to be included would be agreed with the Dee DSFB post consent. There needs to be consideration of what the developer can do to meet both this requirement and the need to participate in the NRMSD.

marine fish ecology

MSS have no comments regarding marine fish ecology.

benthic ecology

Given the large area of seabed impacted by rock dumping and/or mattresses and the volume used, MSS believes it would be advisable to monitor invertebrate settling rates and faunal succession on these introduced substrates.

socio economics

MSS have no comments regarding socio economics.

commercial fisheries

MSS have no comments regarding commercial fisheries.

Hopefully these comments are helpful to you. If you wish to discuss any matters further contact the MSS Renewables in-box MS_Renewables@scotland.gsi.gov.uk.

Yours sincerely



Paul Stainer

Marine Scotland Science

09 February 2017