

From: [REDACTED]
Subject: Re: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 10 March 2017 16:21:50

Dear Jessica,

My apologies for the supplementary response. I have just received a very late comment from the Spey Fishery Board in whose district the proposal would take place - please see below:

We have concerns that dredging for the cable-laying will cause discolouration of the water up to surface level. Furthermore, and significantly, if the operation is to be conducted during the juvenile salmon (smolt) migration period, when Atlantic salmon smolts are departing from their riverine environments and beginning their migration in the marine environment, this may cause problems. With this in mind, it would be useful if any dredging operations were not conducted 24-hours a day and instead allowed a period of 8 hours in every 24 when dredging was not carried out. This would allow any discoloured water to clear and permit salmon smolts which may have held back as a result of discoloured water to continue with their migration as it clears.

If you require any further input, please let me know.

Regards,

[REDACTED] Fisheries Management Scotland
www.asfb.org.uk

On 10 Mar 2017, at 13:32, [REDACTED] wrote:

Dear Jessica,

Many thanks for extending the deadline for us to respond to this. We have now had a chance to consult our local interests and we have no comments to submit.

With kind regards,

[REDACTED]

[REDACTED] | Dir Communications & Administration
Fisheries Management Scotland
www.fms.scot

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From: [REDACTED]
To: [Drew J \(Jessica\)](#)
Subject: RE: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 10 March 2017 13:32:33

Dear Jessica,

Many thanks for extending the deadline for us to respond to this. We have now had a chance to consult our local interests and we have no comments to submit.

With kind regards,

[REDACTED]

[REDACTED] | Dir Communications & Administration
Fisheries Management Scotland
11 Rutland Square, Edinburgh, EH1 2AS
Tel: 0131 221 6567 | [REDACTED]
www.fms.scot

Annual Conference 29 March – Book now at [Eventbrite](#)

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 07 March 2017 07:51
To: planning.aberdeen@sepa.org.uk; Douglas.Watson@thescotlandportfolio.co.uk; sarah.dolman@whales.org; fiona.read@whales.org; scotland.planning@rspb.org.uk; [REDACTED]; buckieanddistrictcc@gmail.com; Renewables@sff.co.uk; [REDACTED]; [REDACTED] FO.Buckie@gov.scot; neal.macpherson@moray.gov.uk
Subject: FW: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Dear Sir/Madam,

Further to my emails below, as we have not received a reply from your organisation, we have now assumed a 'Nil Response'.

Should you have any comment or require an extension, please do contact me immediately.

Kind regards,

Jessica

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 22 February 2017 08:21
To: Planning Dingwall; marineenergy@snh.gov.uk; navigation@nlb.org.uk; ArchieJ@nlb.org.uk; MS_Renewables@gov.scot; Rory.O'HaraMurray@gov.scot; Douglas.Watson@thescotlandportfolio.co.uk; Andrew.Erskine@transport.gov.scot; Val.Ferguson@transport.gov.scot; sarah.dolman@whales.org;

United Kingdom

INSERT +44 (0) 20381 72426
++44 (0)2380 329104
navigationsafety@mcga.gov.uk

Ms Jessica Drew
Marine Licencing
Marine Scotland

Your ref: **BOWL**
Our ref: **MNA 053/008/0028**

22 February 2017

Dear Jessica,

Alternative Installation Methodology at Cable Landfall

Thank you for the opportunity to comment on the potential impact of the above proposed works on the safety of navigation.

The Marine Licence application and supporting documentation have been considered by Navigation Safety Branch. On this occasion, the Maritime and Coastguard Agency (MCA) has no objection to consent being granted provided all maritime safety legislation is followed and the conditions/advisories below are applied:

Conditions:

1. The Licencee must ensure that local mariners and fishermen's organisations are made fully aware of the activity through local notices to mariners.
2. The Licencee must ensure that HM Coastguard, in this case nmoccontroller@hmcg.gov.uk, The National Maritime Operations Centre is made aware of the works prior to commencement.
3. The Licencee must notify the UK Hydrographic Office to permit the promulgation of maritime safety information and updating of nautical charts and publications through the national Notice to Mariners system.

In addition, the following advice should be provided to the applicant to facilitate the proposed works:

Advisories:

1. The Consent Holder should ensure suitable bunding, storage facilities are employed to prevent the release of fuel oils, lubricating fluids associated with the plant and equipment into the marine environment.

If you require any further information please let me know.

Yours sincerely,

Heloise Warner
Navigation Safety Branch

From: [Drew J \(Jessica\)](#)
To: [Drew J \(Jessica\)](#)
Subject: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 10 March 2017 08:00:39
Attachments: [image001.png](#)

From: Neal MacPherson [<mailto:Neal.MacPherson@moray.gcsx.gov.uk>]
Sent: 07 March 2017 10:00
To: Drew J (Jessica)
Subject: RE: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Apologies Jessica,

Moray Council have been in direct discussion with BOWL over the alternative installation methodology at the cable landfall point, as this has a bearing also upon the national level EIA planning application that was considered and consented by Moray Council in late 2015.

Having seen submissions from both the planning consent perspective and the current consultation on the Marine License consultation, Moray Council would respond with no objections to the proposed alternative methodology.

Regards,

Neal MacPherson | Principal Planning Officer | Development Management Planning
neal.macpherson@moray.gov.uk | 01343 563266 | [website](#) | [facebook](#) | [twitter](#) | [newsdesk](#)



From: Jessica.Drew@gov.scot [<mailto:Jessica.Drew@gov.scot>]
Sent: 07 March 2017 7:51 AM
To: planning.aberdeen@sepa.org.uk; Douglas.Watson@thescotlandportfolio.co.uk; sarah.dolman@whales.org; fiona.read@whales.org; scotland.planning@rspb.org.uk; moburrows@live.com; buckieanddistrictcc@gmail.com; Renewables@sff.co.uk; alan@fms.scot; brian@fms.scot; FO.Buckie@gov.scot; Neal MacPherson
Subject: FW: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Dear Sir/Madam,

Further to my emails below, as we have not received a reply from your organisation, we have now assumed a 'Nil Response'.

Should you have any comment or require an extension, please do contact me immediately.

Kind regards,

Jessica

Jessica Drew
Licensing Operations Team
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

BOWL: 003-0W-BOWL-8 - BOWL CONSULTATION FOR A MARINE LICENCE APPLICATION FOR ALTERNATIVE INSTALLATION METHODOLOGY AT CABLE LANDFALL - MLA DEVELOPMENT BOUNDARY & INDICATIVE CABLE LAYOUT

Marine Scotland Science has reviewed the submitted marine licence application and has provided the following comments.

marine fish ecology

MSS have no comments regarding marine fish ecology.

commercial fisheries

MSS have no comments regarding commercial fisheries.

benthic ecology

MSS have no comments regarding benthic ecology.

physical environment

MSS have no comments regarding physical environment.

diadromous fish

MSS's commented in December on Bowl's preferred option to install horizontal ducts for the export cable landfalls, for which a Marine Licence is now in place. In the comments it was noted that "MSS is not considering that the level of disturbance from the installation of horizontal ducts will impact on the salmon smolt runs which also will occur in spring. If the level of disturbance is likely to be higher than MSS is envisaging we would like Bowl / LOT to get back to us on this. Some advance information from various tracking studies being conducted in the Moray Firth suggests that in 2016 the peak timing for entry of smolts into the firth was in early May and that a main migratory path for migrating smolts may be eastwards close to the south side of the firth. The installation of horizontal ducts will occur in this area just to the east of the mouth of the River Spey. That the proposed timing of the work may be prior to main smolt run in early May could provide a useful additional precaution."

Bowl is now requesting that a Marine Licence is issued for open trenching to be used as an alternative method if there are problems implementing the HDD option. Open trenching with backfilling has a greater potential to interact with smolt runs than the HDD option. Although a Marine Licence is in place for open trenching to be used elsewhere on the cable route, the potential for interaction is likely to be greater when work is taking place in shallow water close to the coast.

Section 5.4 of Bowl's Alternative Landfall Cable Installation – Environmental Report looks at the potential risks to fish, including diadromous fish, including from temporary increases in suspended sediment concentration (SSC), and from underwater noise arising from the activities.

With respect to SSC Bowl advises that “Migrating fish may avoid the area affected by increased SSC, but the effects are likely to be very localised and reversible, and fish are not considered to be sensitive receptors in this situation.” and concludes that “Due to the small scale and temporary nature of the impact, the potential for rapid dispersal of the sediments, and the tolerance of the associated fish and shellfish species, the effect of increased suspended sediment and associated sediment deposition is considered to be negligible.”

Regarding underwater noise Bowl advises that “Due to the low level, small scale, localised, short term and reversible (as fish will start to return to the area once activity has ceased) nature of the impact, and taking into consideration the sensitivity of the receptors (including Atlantic salmon and sea lamprey as features of the River Spey SAC), the effect of increased noise on fish and shellfish receptors is considered to be negligible”. MSS notes that any underwater noise arising from the installation of the sheet piling across the shingle bar which will presumably take place at least partly below the high water mark does not appear to be considered. It would be useful for Bowl to clarify whether this is because under the conditions work will be carried out, there will be little propagation of sound from the sheet piling installation work into the underwater environment.

Similar statements about the potential risks to fish are made in Table 6.2 Assessment of cumulative effects and Section 7 Consideration of Likely Significant Effect on Protected Areas in relation to the River Spey SAC.

MSS notes that salmon smolts are a particularly sensitive stage, and that their small size may make it more difficult for them to take avoiding action than larger fish, and that any sort of potential impact should as far as possible be avoided at times when they could be present in significant numbers. If there is reassurance in regard to any underwater noise associated with the sheet piling work, any concern would be about SSC. In the absence of predicted SSC levels expected to occur during the work, a precautionary approach would be avoid the main period when smolts may be present. Figure 2.2 gives two indicative timetables for the work, Option 1 with installation, other than the sheet piling work, being carried out sequentially at the two landfalls and Option 2 with installation being progressed simultaneously at the two outfalls. Both options would indicate that in 2017 only sheet piling across the shingle bar and preparation for trenching would be carried out during the main smolt run. If this would be the timing and the sheet piling work is confirmed as unlikely to create significant underwater noise this would largely remove any risk to smolts. However, there would be the potential for interaction with smolts in 2018, at least in Option 1, and a precautionary approach would be to phase the work to avoid this.

Even if any salmon or sea trout are in the vicinity of work where work will be taking place, they will probably not be visible. If fish are visible and showing signs of distress or injury, or if dead fish are present, the activity should be halted and appropriate action agreed with LOT.

aquaculture

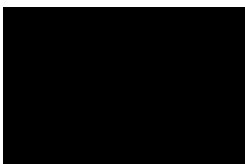
MSS have no comments regarding aquaculture.

socio economics

MSS have no comments regarding socio economics.

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

28 February 2017

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Switchboard: 0131 473 3100

Fax: 0131 220 2093

Website: www.nlb.org.uk

Email: enquiries@nlb.org.uk



Your Ref: Email 270117/JD/Beatrice Cable Method
Our Ref: AJ/OPS/ML/O6_01_389

Ms Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

10 February 2017

Dear Jessica,

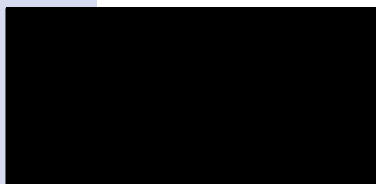
MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

We are in receipt of your email dated 27 January 2017 informing Northern Lighthouse Board of the intention of **Beatrice Offshore Windfarm Ltd** to investigate and consult on an alternative cable installation method for the export cable route associated with the Beatrice Offshore Wind Farm in the Moray Firth.

We note that the cable corridor route passes through an area designated as a Site of Special Scientific Interest (SSSI) and have previously commented through our response dated 11 July 2016 (Ref: O6-01-326).

NLB are content that the alternative method of trenching would not require any further comment from a Navigational Safety perspective and that the requirements contained within our original response are still appropriate.

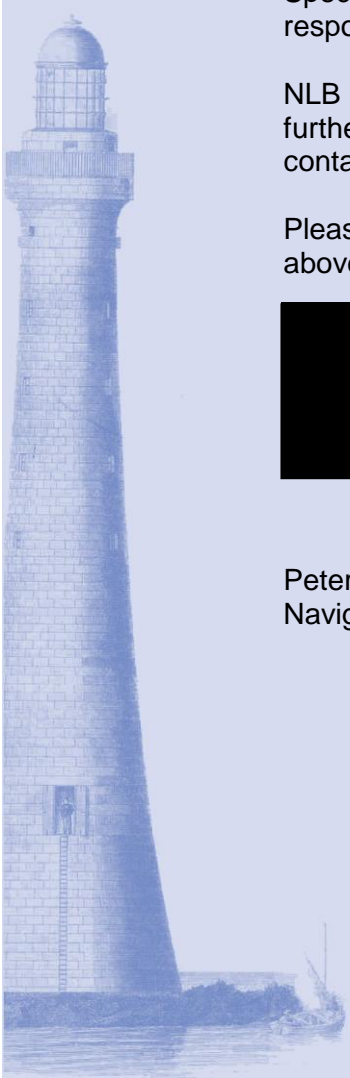
Please advise if we can be of any further assistance, or if clarification of any of the above is required.



Peter Douglas
Navigation Manager

the safety of

to: ISO 9001:2000 · The International Safety Management Code (ISM) · OHSAS



From: [REDACTED]
To: [Drew J \(Jessica\)](#)
Subject: RE: BOWL Alternative Cable Landfall Application
Date: 22 March 2017 16:40:56
Attachments: [image001.gif](#)
[image002.gif](#)

Thanks Jessica for sending through and letting me catch-up on this proposal.

On the basis that the majority of works will be undertaken outside the over wintering season, and the fact they are temporary, we agree that the potential risks to the qualifying features of the Moray Firth pSPA are limited, as set out in the Dec 2016 Environmental Report.

We have no further comments to make on this specific proposal.

Best regards,

[REDACTED]

[REDACTED]

Marine Conservation Planner

Scottish Headquarters 2 Lochside View, Edinburgh Park, Edinburgh, EH12 9DH

Tel 0131 317 4100 **Mob** [REDACTED]

rspb.org.uk



RSPB logo



RSPB Scotland is part of the RSPB, the country's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 22 March 2017 14:46
To: [REDACTED]
Cc: Catarina.Aires@gov.scot; Sophie.Humphries@gov.scot
Subject: BOWL Alternative Cable Landfall Application

Good afternoon [REDACTED]

Please find attached the Alternative Landfall Cable Installation Method – Environmental Report and Development boundary map.

As the consultation period ended on 6th March 2017 the deadline for comments would be 12 pm,

From: [REDACTED]
To: [Drew, J \(Jessica\)](#)
Subject: RE: BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 03 February 2017 12:19:45
Attachments: [image001.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.png](#)
[image009.png](#)
[image010.jpg](#)

Hi Jessica,

I write to inform you that RYA Scotland has no comment to make on this application.

Kind Regards

[REDACTED]

[REDACTED]
Senior Administrator

Tel: [REDACTED]

Royal Yachting Association Scotland

T: [REDACTED]

E: [REDACTED] [@ryascotland.org.uk](mailto:[REDACTED]@ryascotland.org.uk)



[REDACTED]
[REDACTED] [REDACTED]



RYAS_footer_InstructorConfv2



From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]

Sent: 27 January 2017 16:42

To: planning.dingwall@sepa.org.uk; marineenergy@snh.gov.uk; navigationsafety@mcga.gov.uk; nick.salter@mcga.gov.uk; navigation@nlb.org.uk; ArchieJ@nlb.org.uk; MS_Renewables@gov.scot; Rory.O'HaraMurray@gov.scot; Douglas.Watson@thescotlandportfolio.co.uk; [REDACTED] Andrew.Erskine@transport.gov.scot; Val.Ferguson@transport.gov.scot; [REDACTED] planning.scotland@rspb.org.uk; [REDACTED]; [REDACTED] FO.Buckie@gov.scot; neal.macpherson@moray.gov.uk
Cc: Paul.Stainer@gov.scot; DLEEBMPPMPS@gov.scot; info@morayfirth-partnership.org; Nicola.Bain@gov.scot; Catarina.Aires@gov.scot
Subject: BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Dear Sir/Madam

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

Our ref: PCS/151700
Your ref:

If telephoning ask for:
Alison Wilson

3 March 2017

Jessica Drew
Marine Scotland
Marine Laboratory
PO Box101
375 Victoria Road
Aberdeen
AB11 9DB

By email only to: MS.MarineRenewables@gov.scot

Dear Ms Drew

**A MARINE LICENCE UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010
BEATRICE OFFSHORE WINDFARM LIMITED (“BOWL”) – ALTERNATIVE
INSTALLATION METHODOLOGY AT THE BEATRICE OFFSHORE WIND FARM
CABLE LANDFALL LOCATION IN SPEY BAY**

Thank you for your consultation email which SEPA received on the 22 February 2017, enclosing an application for open trenching as an alternative installation method to be implemented in the event that the Direct Pipe (the preferred form of HDD installation) methodology proves unsuccessful in the field.

We note that no specific reason for consultation was identified and therefore we would refer you to our standing advice at [SEPA standing advice for the Department of Energy and Climate Change and Marine Scotland on marine consultations](#).

For advice on licensable marine activities, please refer to Section 3 for general advice and Table 1 for development type specific guidance. These constitute our standing advice on environmental issues within our remit. For renewables, including any associated infrastructure such as cables, the following specific advice is provided in Table 1:

Renewables	
Installation of tidal, wave and wind devices (<u>and any associated infrastructure</u>) below MHWS.	SEPA has no objection to this application and in this instance has no site-specific advice or comment to make.

Should you consider that the development proposal has potentially significant impacts on aspects of the environment regulated by SEPA which is not dealt with adequately by our standing advice, then please re consult us specifying exactly the aspect of the environment on which our advice is sought.

Regulatory advice for the applicant

Drawing number BEA_MAP-SSER-657 shows the onshore pipe thruster pits in close proximity to the Burn of Tynet and an open drain to the west. We can confirm that no licence would be required for the works under the Controlled Activities Regulations (CAR) but they will be required to comply with appropriate General Binding Rules (GBR's) when working in the vicinity of these water features. Please refer to the [CAR Practical Guide](#) and specifically GBR's 10 and 11.

If you have any queries relating to this letter, please contact me by telephone on 01224 266656 or email at planning.aberdeen@sepa.org.uk.

Yours sincerely

Alison Wilson
Senior Planning Officer
Planning Service

Ecopy to applicant: Jonathan Wilson, Beatrice Offshore Windfarm Limited,
jonathan.wilson@sse.com

From: [Malcolm Morrison](#)
To: [Drew J \(Jessica\)](#)
Subject: RE: BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 21 February 2017 15:57:03

Nil response from SFF

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 27 January 2017 16:42
To: planning.dingwall@sepa.org.uk; marineenergy@snh.gov.uk; navigationsafety@mcga.gov.uk; nick.salter@mcga.gov.uk; navigation@nlb.org.uk; ArchieJ@nlb.org.uk; MS_Renewables@gov.scot; Rory.O'HaraMurray@gov.scot; Douglas.Watson@thescotlandportfolio.co.uk; Pauline.McGrow@ryascotland.org.uk; Andrew.Erskine@transport.gov.scot; Val.Ferguson@transport.gov.scot; sarah.dolman@whales.org; planning.scotland@rspb.org.uk; [REDACTED]; buckieanddistrictcc@gmail.com; Renewables <Renewables@sff.co.uk>; alan@fms.scot; brian@fms.scot; FO.Buckie@gov.scot; neal.macpherson@moray.gov.uk
Cc: Paul.Stainer@gov.scot; DLEEBMPPMPS@gov.scot; info@morayfirth-partnership.org; Nicola.Bain@gov.scot; Catarina.Aires@gov.scot
Subject: BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Dear Sir/Madam

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

Beatrice Offshore Windfarm Limited ("BOWL") – Alternative Installation Methodology at the Beatrice Offshore Wind Farm cable landfall location in Spey Bay, approximately 1.5 km west of Portgordon harbour.

COORDINATES :

57°40.020' N 003°02.889' W
57°40.034' N 003°01.811' W
57°39.840' N 003°01.836' W
57°40.007' N 003°02.940' W

Marine Scotland Licensing Operations Team ("MS-LOT") have received the attached proposal under the above Act for a Marine Licence for an Alternative Installation Methodology at the cable landfall in Spey Bay, approximately 1.5 km west of Portgordon harbour.

Please forward any comments you may have on these proposals, in an electronic format to MS.MarineRenewables@gov.scot by **24th February 2017**.

If you are unable to meet this deadline please inform us in writing as soon as possible. We will aim to grant an extension to the consultation period.

Should you have any queries please do not hesitate to contact us.

Yours faithfully



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Marine Scotland
Licensing Operations Team
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

CNS REN OSWF Beatrice

For the attention of: Jessica Drew

23 February 2017

BEATRICE OFFSHORE WIND FARM SNH ADVICE ON ALTERNATIVE CABLE INSTALLATION

Thank you for consulting SNH on this marine licence application for an alternative installation methodology at the Beatrice cable landfall. The red line boundary for this application is shown on the accompanying map, it encompasses Spey Bay Site of Special Scientific Interest (SSSI) and nearshore waters. The purpose of the application is to allow the cable to be trenched in this area, should there be a failure of the primary installation method (direct pipe). BOWL have agreed with MS-LOT what constitutes the definition of failure.

SNH has discussed this cable trenching in detail with BOWL (at the meeting held 15 September 2016) and provided pre-application advice in our note of 11 October 2016.

SNH advice on the alternative cable installation

We have considered the effects of cable trenching on Spey Bay SSSI and in relation to other natural heritage interests potentially affected. We confirm that the key matter to address is the SSSI coastal geomorphology interest and that the cable trenching will have no significant effect on any other SSSI features. In **Annex A**, we discuss good working practice and mitigation measures relevant to the cable trenching activity. Adoption of these measures will avoid any significant impacts on the geomorphology interests of Spey Bay SSSI.

We confirm that cable trenching does not present any significantly different impacts to other natural heritage interests, compared to those previously assessed for the primary installation method (direct pipe). Our advice is as follows:

- **Marine mammals**

We've identified the southern Moray Firth coastline as important for marine mammal interests, especially bottlenose dolphin, but we note that the nearshore waters within this application boundary are too shallow for marine mammals to be routinely present. We therefore agree that the proposed cable trenching will not significantly affect marine mammals – the duration of activity is relatively short and the possible impacts all minor.

We note that potential disturbance to European protected species of whale and dolphin has already been addressed via the EPS licence issued for Beatrice construction work, covering cable installation and associated vessel movements.

- **Diadromous fish**

We recommend that cable trenching through nearshore waters is timed to avoid peak smolt runs of Atlantic salmon from the River Spey Special Area of Conservation (SAC). This mitigation will avoid any likely significant effects on SAC interests and is the same as that agreed for the primary installation method.

- **Benthic interests**

We confirm that trenching the Beatrice cable will not significantly affect intertidal or benthic interests. The amount of habitat disturbance is small scale and temporary and the communities will recover in time.

- **Ornithology**

We have considered the proposed Special Protection Area (pSPA) in the Moray Firth. As the cable trenching crosses the pSPA there will be connectivity between the development proposal and the pSPA features of interest. We do, however, advise that there is no likely significant effect on pSPA birds species, this is because the cable trenching works are taking place over the summer whereas the greatest presence of birds is in the winter. We also note that the extent of the works is small relative to the size of the pSPA, so that disturbance is localised and without significant cost to any such birds which are disturbed by this activity.

Further information

If you have any queries or comments in relation to this advice, please don't hesitate to get in touch.

Yours sincerely,

Catriona Gall

Marine Renewables Casework Adviser (Offshore Wind)
SNH Policy & Advice

ANNEX A

We met with BOWL on 15 September 2016 to discuss this proposed cable trenching in detail, particularly in relation to the geomorphological interest of Spey Bay SSSI. In the environmental report, BOWL have addressed the points we raised at this meeting alongside those we'd raised previously in our response to the primary installation method (direct pipe), 16 August 2016.

We're satisfied with the final "Geomorphological Assessment of Alternative Landfall Option" included as Appendix A of the environmental report. We have the following advice to provide on good working practice and mitigation measures during the cable trenching. Adoption of these measures will avoid any significant impacts on the geomorphology interests of Spey Bay SSSI.

Sediment transport

The cable trenching includes placement of sheet piling on either side of the trench, to stabilise the walls and to minimise the amount of excavation required. We welcome this proposal as it minimises the cut width of the trench and therefore the level of disturbance to the gravel ridge.

However, this sheet piling may dam the natural longshore transport of gravel by storm waves. Using very rough calculations we think the maximum volume dammed may be one order of magnitude less than the annual net transport rate quoted in the report – i.e. several hundred m³ compared to several thousand. We advise that this would be a minor impact. On this basis, we do not consider that 'sediment bypassing' – i.e. using an excavator to shift gravel from one side of the trench to the other – is necessary to avoid any adverse impact to the geomorphological interest of the SSSI.

We note, however, that sediment bypassing may be needed for engineering reasons or health and safety and we have no objection to it being undertaken. If it is required, then we make the following recommendations on good practice working methods:

- i. If sediment bypassing requires the use of excavators or other vehicles outwith the mapped working corridor (i.e. on the 'far' side of the trench) then this should be kept to a minimum; any tracking on gravel should, if possible, only be on areas where gravel is being placed.
- ii. Subject to (i) above, placement of gravel on the 'far' side of the trench should mirror the original location in terms of position on the ridge profile and distance from the trench.
- iii. If and when there are two cable trenches 'in situ', any placement of dammed-up gravel should be between the two trenches (unless this causes an undesirable build-up of its own).
- iv. Each of these sediment bypass operations should be fully recorded in terms of volumes of gravel moved, together with source and destination locations as discussed under (ii) above.

SNH would welcome the opportunity for a site visit to observe the cable trenching work and any required sediment bypassing.

Reinstatement of the gravel ridge after works

The environmental report commits to exact re-instatement of the gravel ridge after works are completed. If there's been a damming-up of naturally transported gravels during the works (net of any sediment bypassing that may have been undertaken), this commitment could only be delivered by re-distributing the excess gravel elsewhere. We advise that the excess should instead be smoothly re-profiled through the re-instated working corridor, i.e. re-instating the surface form of the ridge even though its volume has increased. Natural processes would then be left to re-work the excess.

Stockpile locations

The environmental report says gravels stockpiled for trench infilling would be “located well outside the SSSI boundary” (Table 4.1) or “landward of the SSSI boundary (Table 2.2). We welcome this commitment as any stockpiling (and subsequent removal) on the ridge itself, including any landward gravel overwash lobes, could damage the landform. The agreed area(s) for stockpiling should be clearly and correctly demarcated on any mapping, with clear instruction that stock-piling should only take place on the vegetated fields and not on any areas of gravel.

Catarina Aires
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory,
375 Victoria Road,
Aberdeen,
AB11 9DB

Your ref:

Our ref:
TS00538

Date:
21/02/2017

MS.MarineRenewables@gov.scot

Dear Sirs,

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

BEATRICE OFFSHORE WINDFARM LIMITED (“BOWL”) – ALTERNATIVE INSTALLATION METHODOLOGY AT THE BEATRICE OFFSHORE WIND FARM CABLE LANDFALL LOCATION IN SPEY BAY, APPROXIMATELY 1.5 KM WEST OF PORTGORDON HARBOUR

With reference to your recent correspondence on the above development, we acknowledge receipt of the Environmental Report prepared by RPS Energy in support of the above development.

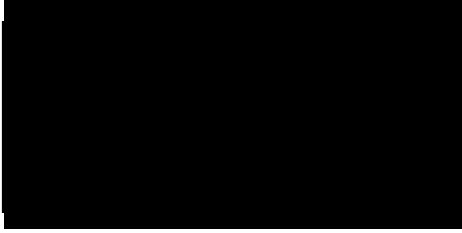
This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the review undertaken, Transport Scotland would provide the following comments.

We understand that the existing Marine License (Ref: 04461/16/0) permits the installation of transmission cables at the landfall location. As a project risk management measure, Beatrice Offshore Windfarm Limited are seeking consent for an alternative installation methodology to be implemented in the event that the preferred form of installation proves unsuccessful in the field. The alternative method is for open trenching between the original proposed landward pipe entry points and offshore final exit points of the original profile. The export cable landfall location is approximately 1.5km west of Portgordon harbour, directly within Spey Bay in Moray. The nearest trunk road to the site is the A96(T), located approximately 7.8km to the south.

Having reviewed the submitted information, we note that the alternative installation methodology does not significantly impact on the trunk road area and as such, Transport Scotland has no objection to the proposal in terms of environmental impact on the trunk road receptors.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 226 6923.

Yours faithfully



John McDonald

**Transport Scotland
Trunk Road and Bus Operations**

cc Alan DeVenny – SYSTRA Ltd

From: [Drew J \(Jessica\)](#)
To: [Drew J \(Jessica\)](#)
Subject: FW: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall
Date: 10 March 2017 08:00:53

From: Fiona Read [<mailto:fiona.read@whales.org>]
Sent: 08 March 2017 10:35
To: Drew J (Jessica)
Subject: RE: Reminder - BOWL Consultation for a Marine Licence Application for Alternative Installation Methodology at Cable Landfall

Dear Jessica,

Sorry for the late reply. No comments from WDC on the Alternative Installation Methodology for BOWL.

Best wishes,

Fiona

Fiona Read
Policy officer
End Bycatch
whales.org

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Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo le gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh, leig fios chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.
