

**From:** [Gordon McLean](#)  
**To:** [Drew J \(Jessica\)](#)  
**Subject:** RE: European Offshore Wind Deployment Centre  
**Date:** 13 April 2017 13:42:31

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Hello Jessica,

Thank you for this. Having studied the maps further it appears that it all falls within Aberdeenshire and we will therefore not be submitting any comments as it is out with our jurisdiction.

Kind regards,  
Gordon

**Gordon McLean**

Environmental Planner

Environmental Policy Team

*Protecting the irreplaceable, promoting the sustainable.*

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**Communities, Housing and Infrastructure,**  
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**From:** Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]  
**Sent:** 12 April 2017 11:36  
**To:** Gordon McLean  
**Cc:** Sophie.Humphries@gov.scot; Catarina.Aires@gov.scot; MS.MarineRenewables@gov.scot  
**Subject:** RE: European Offshore Wind Deployment Centre

Good morning Gordon.

Thank you for your email of 7<sup>th</sup> April 2017, I apologise for missing your call.

In response to your query, the Developer has stated that *‘To avoid repetition and reduce the size of these plans in the Construction Method Statement we make references to the detail provided in the Cable Laying Strategy’*.

The Cable Laying Strategy (“CLS”) can be found on the Marine Scotland website [here](#).

## Humphries S (Sophie)

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**From:** Nick Salter <Nick.Salter@mcga.gov.uk>  
**Sent:** 25 April 2017 10:00  
**To:** Humphries S (Sophie); MS Marine Renewables  
**Cc:** Drew J (Jessica); Aires C (Catarina)  
**Subject:** RE: ONE WEEK REMINDER: Consultation on the Construction Method Statement for the European Offshore Wind Deployment Centre ("EOWDC")

Dear Sophie,  
I have no comments  
Regards  
Nick

Nick Salter  
Offshore Renewables Advisor  
Navigation Safety Branch | Maritime and Coastguard Agency  
Spring Place | 105 Commercial Road | Southampton | SO15 1EG  
Tel: 020 3817 2433 | [REDACTED] | Email: [nick.salter@mcga.gov.uk](mailto:nick.salter@mcga.gov.uk)



Safer Lives, Safer Ships, Cleaner Seas

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**From:** Sophie.Humphries@gov.scot [mailto:Sophie.Humphries@gov.scot]  
**Sent:** 24 April 2017 15:05  
**To:** [planning.aberdeen@sepa.org.uk](mailto:planning.aberdeen@sepa.org.uk); [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk); Nick Salter <Nick.Salter@mcga.gov.uk>; [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)  
**Cc:** [Jessica.Drew@gov.scot](mailto:Jessica.Drew@gov.scot); [Catarina.Aires@gov.scot](mailto:Catarina.Aires@gov.scot)  
**Subject:** ONE WEEK REMINDER: Consultation on the Construction Method Statement for the European Offshore Wind Deployment Centre ("EOWDC")

Dear Sir/Madam,

### **ELECTRICITY ACT 1989**

*The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000*

### **European Offshore Wind Deployment Centre ("EOWDC") Section 36 Consent Condition 13; Construction Method Statement ("CMS").**

Further to our email of 4<sup>th</sup> April 2017, requesting your comments on the CMS for EOWDC.

A gentle reminder, that the deadline for providing comments on this consultation is **2<sup>nd</sup> May 2017**. Should you be unable to meet this deadline, please contact us to arrange an extension to the consultation period to enable you to provide comments. If you have no comments to make please submit a "nil return" response.

Kind regards,

Sophie

**Sophie Humphries**  
Marine Renewables Casework Officer

# Northern Lighthouse Board

**CAPTAIN PHILLIP DAY**  
**DIRECTOR OF MARINE OPERATIONS**

Your Ref: 040417 – JD – EOWDC - (CMS)  
Our Ref: AJ/OPS/ML/O6\_03\_409

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Ms Jessica Drew  
Marine Licensing Casework Officer  
Marine Scotland – Marine Planning and Policy  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

18 April 2017

Dear Jessica,

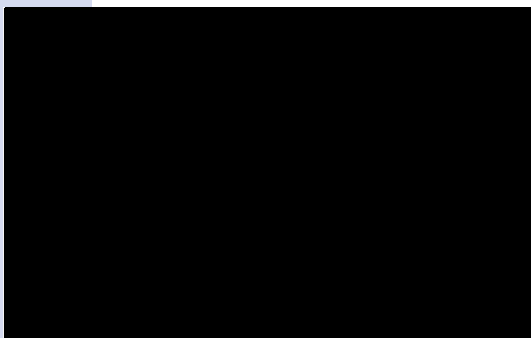
## **EOWDC SECTION 36 Consent Condition 13 – Construction Method Statement (CMS)**

Thank you for your correspondence dated 04 April 2017 regarding the submission of the proposed Construction Method Statement (CMS) to satisfy the above condition of consent by **Aberdeen Offshore Windfarm Limited** to install and operate wind turbines and the associated electrical interconnecting and export cables at their wind farm site in Aberdeen Bay.

NLB are content with the information contained within the Construction Method Statement and any procedures to be employed along with the construction related mitigation measures to reduce the risk within the marine environment.

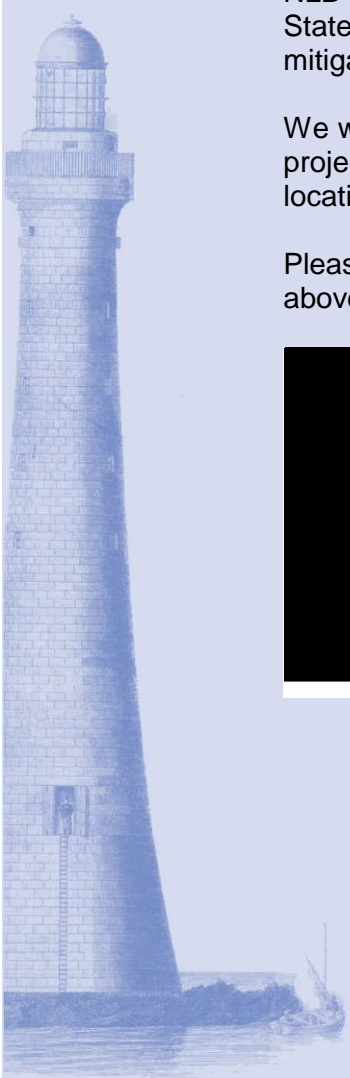
We will continue regular communications with AOWL and their representatives as the project progresses to ensure the mariner is best informed of the works and any location of operations being carried out in relation to the project.

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



the safety of

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



Our ref: PCS/152420  
PCS/152518  
PCS/152621  
Your ref: ABE-ENV-DB-0003

If telephoning ask for:  
Zoe Griffin

5 May 2017

Marine Scotland  
Marine Laboratory  
PO Box 101  
375 Victoria Road  
Aberdeen  
AB11 9DB

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

Dear Ms Humfries

## **ELECTRICITY ACT 1989**

### **The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000**

### **MARINE (SCOTLAND) ACT 2010 & MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING**

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

### **European Offshore Wind Deployment Centre ("EOWDC") Section 36 Consent Condition 13 ; Construction Method Statement and Marine Licence 04309/16/1 Condition 3.1.11.; Marine Pollution Contingency Plan ("MPCP")**

Thank you for your consultation emails of 4 April 2017, 7 April 2017 and 18 April 2017 in relation to the discharge of conditions 13 and 25 for the above Section 36 consent and conditions 3.1.11, 3.2.1.2 and 3.2.1.7 of the above Marine Licence.

We have prepared one response to these three consultations as the three documents submitted are strongly interlinked.

## **Advice for the Marine Scotland**

In summary, we **advise against the discharge** of Conditions 13, or any part of, and 25 in relation to the Section 36 and Conditions 3.1.11, 3.2.1.2 and 3.2.1.7 in relation to the Marine Licence **due to lack of information** contained within the submitted Construction Method Statement (ABE-ENV-DB-0014, dated 20/03/2017), Marine Pollution Contingency Plan (ABE-ENV-DB-0004, dated 06/04/2017) and the Cable Laying Strategy (ABE-ENV-DB-0003, dated 27/01/2017)

We give advice below on what further information will be required in order for us to advise discharge of this condition.

## **1. Background**

- 1.1 Under the Town and Country Planning (Scotland) Acts we have been consulted on the onshore elements of the project including the two landfall options via two planning applications APP/2012/4219 and APP/2017/0091. Both these applications include cable works down to mean low water spring tides (MLW).
- 1.2 In relation to APP/2012/4219 Condition 5 requires submission of construction methods for the landfall cables taking into account coastal processes and other environmental considerations. Although we have not had sight of a final decision document for APP/2017/0091 we have requested by way of condition the submission of a revised CEMP and Site Investigation Report including a CMS for the proposed Horizontal Directional Drilling (HDD) and associated cabling.
- 1.3 We note that the Cable Laying Strategy (CLS) submitted to yourselves covers the two landfall options for the cables from MLW to the transition pits above mean high water level and therefore there is overlap with the Section 36 and Marine Licence works and those covered by the two planning applications. In addition, Condition 13 of the Section 36 specifically requires pollution measures associated with the landfall cabling to be included within the CMS. All three documents (CMS, CLS and Marine Pollution Contingency Plan (MPCP) refer to the landfall works and imply that they are seeking approval for this element of the works through the Section 36 and Marine Licence.
- 1.4 As such, we are concerned that if the CLS and CMS are approved as submitted they would contradict the information we will require to be submitted to satisfy our requirements for the planning application conditions.
- 1.5 Therefore, in order to avoid this scenario and any confusion we wish to ensure the documents submitted to satisfy the conditions for the Section 36 and Marine Licence will meet our requirements and be compatible with those to be submitted by the applicant for planning applications APP/2017/0091 and APP/2012/4219

## **2. Construction Method Statement (CMS)**

- 2.1 We note Condition 13 of the Section 36 consent states the CMS must include, information on the following matters:
  - (a) Commencement dates;
  - (b) Working methods including the scope, frequency and hours of operations;
  - (c) Duration and Phasing Information of key elements of construction, for example turbine structures, foundations, turbine locations, inter-array cabling and land fall cabling;
  - (d) Method of installation including techniques and equipment and depth of cable laying and cable landing sites;
  - (e) The use of Dynamic Positioning vessels and safety/guard vessels;
  - (f) Pollution prevention measures including contingency plans; and
  - (g) Design Statement

And that the CMS must be cross referenced with the Project Environmental Management Plan, the Vessel Management Plan and the Navigational Safety Plan.

- 2.2 After reviewing the CMS and in particular Section 9, there appears to be no information regarding pollution prevention measures required in (f) above with regards to the landfall works. The CMS states "...greater detail on the installation of the cables is contained within Section 9.3 of the Cable Laying Strategy" but again this does not appear to cover any mitigation measures for the two landfall options either. We have also been consulted separately on the MPCP but note that this too is also aimed solely at the offshore works.
- 2.3 In order to meet the requirements of part f of Condition 13, we request either: a separate document covering the landfall elements of the works in comprehensive detail is provided; an enhanced section 9 of the CMS document; or the information is added to the MPCP. We are not particularly concerned where the information is included, but each document will then need to be revised to make reference to it.
- 2.4 The additional information required in the CMS in relation to the landfall works should include:
- full details of construction methods and pollution mitigation proposals,
  - including timing of the works and detailed plans,
  - baseline surveys,
  - risk assessments,
  - any works undertaken to identify sensitive receptors.
- 2.5 We wish to highlight the Blackdog landfill has an ongoing problem of causing pollution through the leakage of hydrocarbons, particularly to groundwater. The potential impact of the construction and cable laying on the landfill in terms of either further direct release of pollutants into controlled waters (the North Sea) or indirect via groundwater, needs to be addressed either in the CMS or the other two documents. There is also no indication of whether or not the existing pilot remediation proposals for Blackdog landfill have been considered.

### **3. Cable Laying Strategy**

- 3.1 The CLS outlines the two landfall options being considered. However, after reviewing the document it is not clear which methodologies are being considered for which landfall option. We request the methodology for each option is made clearer.
- 3.2 We also request the following information is included before we can assess the proposal in relation to our interests:
- Proposed depth of any HDD (protection of groundwater)
  - If/where the HDD will intersect with groundwater (protection of groundwater)
  - Pollution prevention (protection of controlled waters)
  - Risk assessments for potential pollution sources including the Blackdog landfill (protection of controlled waters)
  - Source-receptor-pathway hazard assessments (protection of controlled waters)
  - Construction timetable (timescales for regulatory input and resource)
  - Disposal/reuse options for spoil (waste management licensing/duty of care/zero waste)
  - Mitigation for silt pollution arising from cable laying (protection of controlled waters)

- 3.3 The key constraints in section 5.2 of the CLS do not mention the Blackdog landfill or the need to ensure that any future remediation plans for the landfill site are not impeded, hampered or otherwise rendered ineffective by this proposal. We would wish to see confirmation that this has been considered.
- 3.4 On page 44 the document states: "...will pass beneath the Burn and dunes and as such will have limited ecological impact". However, this may be the case if the drilling intersects Blackdog landfill and leads to additional pollutant release, or prevents/hinders the current remediation works. Therefore this potential pollution source needs to be assessed and mitigation proposals included in the CLS or other appropriate documentation.
- 3.5 We note that the Cable Protection Plan has been incorporated into the CLS (Chapter 10). However, there appears to also be no indication in the CLS of whether dune stabilisation will be required in the long term to prevent exposure/damage to underlying cables in the landfall sections. We request this is also included in the document as part of the Cable Protection Plan for the landfall element.

#### **4. Marine Pollution Contingency Plan (MPCP)**

- 4.1 We require a more robust pollution prevention plan for undertaking all landfall works, as currently the pollution contingency plan is mainly focused on prevention of spills from ships at sea, and less concerned with prevention of direct pollution from the undertakings themselves.

#### **Advice to applicant**

##### **5 Blackdog Landfill**

- 5.1 We have made reference to the pilot remediation project for the Blackdog Landfill. For further information on this we recommend you contact Adam Ritchie, Contaminated Land Officer at Aberdeenshire Council.

#### **Regulatory advice for the applicant**

##### **6. Regulatory requirements**

- 6.1 Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Any engineering works impacting the Blackdog Burn are likely to require authorisation. However, there is insufficient information in the documentation to date to determine what level of authorisation would be required. Please note any proposed cabling under a watercourse also needs to be carried out in accordance with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). Useful guidance on the best crossing types can be found in the [CAR Practical Guide](#) and General Binding Rule 7 would have to be adhered to if boring under a watercourse such as the Blackdog Burn.
- 6.2 Further details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office at: Inverdee House, Baxter Street, Aberdeen AB11 9QA. [Tel:01224 266600](tel:01224266600).

If you have any queries relating to this letter, please contact me by telephone on 01224 266636 or e-mail at [planning.se@sepa.org.uk](mailto:planning.se@sepa.org.uk)

Conclusion

Yours faithfully

Zoe Griffin  
Senior Planning Officer  
Planning Service

Copy: Vattenfall, Ester Villoria, Environment and Consents Manager, Vattenfall, Aberdeen  
Offshore Wind Farm Ltd., 3<sup>rd</sup> Floor, The Tun Building, 4 Jackson's Entry, Holyrood Road,  
Edinburgh EH8 8PJ

*Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).*



## Humphries S (Sophie)

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**From:** Catriona Gall <Catriona.Gall@snh.gov.uk>  
**Sent:** 20 April 2017 17:09  
**To:** Drew J (Jessica)  
**Cc:** Aires C (Catarina); Bain N (Nicola) (MARLAB); Humphries S (Sophie); Erica Knott  
**Subject:** Aberdeen Bay EOWDC - SNH comments on construction plans

Dear Jessica,

Thank you for the recent consultations on the vessel management plan (VMP), construction method statement (CMS) and marine pollution contingency plan (MPCP) for Aberdeen Bay offshore wind farm. Taken together, these plans provide a helpful summary of the intended work and time lines for construction of this wind farm.

Construction is due to commence in July 2017 and anticipated to be completed during May – September 2018 (Table 6, p41 of the CMS).

For construction activity, the marine co-ordination centre will be based in Aberdeen Harbour, and crew transfers will be made from here. The suction bucket foundations are to be assembled at River Tyne and delivered to Peterhead. They will then be transferred from Peterhead to the wind farm for installation. The wind turbines will be delivered direct to site from Denmark and the cables are coming direct to site from Hartlepool (see section 5.2, p22 of the VMP).

We do not have major comments on these plans, however, we note that it would have been helpful to have received the offshore environmental management plan (OEMP) in advance or at least alongside these subsidiary plans. We advise that the OEMP should provide an overview of project management structures, staff roles, responsibilities and project communications. In particular, SNH would welcome confirmation of the appointment of an environmental clerk of works (ECOW) and some further detail on their anticipated role and responsibilities (marine licence condition 3.2.1.4).

In this regard (as already agreed for Hywind), we have no strong concerns if an 'in-house' ECOW is used at Aberdeen Bay EOWDC. This is because it is a small-scale demonstration project using suction bucket foundations and we do not identify any major pathways to impact during construction for natural heritage interests of concern (marine mammals, seabirds, fish or benthic interests).

We had a useful presentation from Vattenfall on suction bucket technology during a pre-commencement meeting held earlier this year (7 February 2017). The CMS gives an overview of this type of foundation and its installation and we do not require any further detail here. Similarly, the cable-laying strategy addresses the export cable and intra-array cabling and we have already commented on this (SNH emails, 7 and 9 March 2017).

Our main comments on the current plans are in relation to the VMP, where we advise that the following matters should be addressed:

- Reference should be made to the **Scottish wildlife watching code** and further detail should be provided on staff training in this regard:  
<http://www.marinecode.org/>
- We require further detail on prevention measures to avoid the introduction of **invasive non-native species** especially in relation to the delivery of turbines from continental ports. Please refer to our website for further information and relevant links:  
<http://www.snh.gov.uk/land-and-sea/managing-coasts-and-sea/marine-nonnatives/>

Finally, we note that it is not a requirement for Vattenfall to submit an operations and maintenance programme prior to the commencement of development, rather this will be provided three months prior to wind farm completion / commissioning (marine licence condition 3.2.3.5).

We welcome consultation at the appropriate time, as well as on the OEMP, due shortly.

Please be aware that I am on leave w/c 24 April, so that if you have any queries in relation to this advice please direct them to: [MARINEENERGY@snh.gov.uk](mailto:MARINEENERGY@snh.gov.uk)

Yours sincerely,

**Catriona Gall**

Marine Renewables Casework Adviser - Offshore Wind

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Battleby  
Redgorton  
Perthshire  
PH1 3EW

direct dial: 01738 - 458665

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

**Sent:** 30 March 2017 08:03

**To:** navigation@nlb.org.uk; ArchieJ@nlb.org.uk; navigationsafety@mcga.gov.uk; nick.salter@mcga.gov.uk; fiona.read@whales.org; sarah.dolman@whales.org; j-gaskin@aberdeen-harbour.co.uk; a-mcintosh@aberdeen-harbour.co.uk; info@aberdeen-harbour.co.uk; MARINEENERGY; amundin@ukchamberofshipping.com; katrina.ross@broa.org; aziou@ukchamberofshipping.com; rmerrylees@ukchamberofshipping.com

**Cc:** Catarina.Aires@gov.scot; Nicola.Bain@gov.scot; Sophie.Humphries@gov.scot

**Subject:** Consultation on Vessel Management Plan ("VMP") for EOWDC

## **ELECTRICITY ACT 1989**

*The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000*

### **European Offshore Wind Deployment Centre ("EOWDC") Section 36 Consent Condition 24; Vessel Management Plan ("VMP").**

Dear Sir/Madam,

Please find attached EOWDC's Vessel Management Plan ("VMP") (Revision 0.0, issued on 06/03/2017), together with a cover letter. The intention of this VMP is to satisfy Section 36 Consent Condition 24.

The condition states that the plan must be submitted to the Scottish Ministers for their written approval. MS-LOT, on behalf of the Scottish Ministers, would like to invite comments on the VMP from Scottish Natural Heritage ("SNH"), Whale and Dolphin Conservation ("WDC"), Maritime and Coastguard Agency ("MCA") Northern Lighthouse Board ("NLB"), Aberdeen Harbour Board and the Chamber of Shipping ("CoS").

Please note that we do not seek comments on the section 36 Consent, which will not be amended.

We would appreciate any comments you may have on the attached document. If you wish to submit any comments, please do so to [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot) before the **27<sup>th</sup> April 2017**.