

# CAITHNESS - MORAY HVDC REINFORCEMENT

OFFSHORE INSTALLATION CUMULATIVE IMPACT REVIEW

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03	22.12.17	-		



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Revision 03 note (all revisions highlighted in yellow background):

- 1. Section 1.1 minor additions to text
- 2. General MORL changed to MOW(E)L
- 3. Section 5 minor addition to text
- 4. Section 6 amendments to programme dates and SIMOPS
- 5. Section 7 minor addition to text
- 6. Section 8 previous 4<sup>th</sup> bullet point removed



#### 1 INTRODUCTION

This latest revision (rev.3) of the Cumulative Impact Review has been updated to reflect the requirements for increased rock armour protection (and supporting marine licence), within 0-12nm of both the Moray and Caithness Coast. Significant updates are highlighted in yellow.

The purpose of this document is to summarise the cumulative impact of the Beatrice Offshore Windfarm Limited (BOWL) and Moray Offshore Renewables Limited (MOW(E)L) 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 MOW(E)L'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 MOW(E)L.

? +?√

	×	?		· ·		<b>√</b> ✓	<del></del>		
Key	No interaction		rtain		sible		kely	-	rtain
	140 Interaction	Unice	itaiii		action		action		action
Issue/mechanism	n		Cable infrastructure	Offshore wind farms	PFOW tidal projects	PFOW wave projects	Oil and gas exploration	Conservation	Coastal development
Seabed character	changes		<b>√</b> √	<b>√</b> √	<b>√</b> √	<b>√</b> √	<b>√</b> √	x	×
Water quality char sediments	nges due to re-susp	ended	?√	?√	×	×	?√	х	?√
Seascape change	s		×	<b>///</b>	<b>√</b> √	<b>√</b> √	<b>√</b> √	x	<b>√</b> √
Direct seabed dist	turbance		<b>√</b> √	<b>√</b> √	<b>√</b> √	<b>√</b> √	<b>√</b> √	x	?√
Effects on migration	ng salmon		×	?	?	?	×	×	×
Disturbance to se	abirds offshore		?√	<b>√</b> √	?√	?√	?√	x	?√
Disturbance to ma	arine mammals from	n noise	×	<b>√</b> √	×	×	<b>///</b>	x	?√
Ecological impact chemicals	s from spillages of	oil and	×	×	×	×	?√	x	?√
Disturbance to co	mmercial fishing		?√	<b>√</b> √	×	<b>√</b> √	<b>√</b> √	?√	×
Obstacle to naviga	ation from offshore		<b>√</b> √	<b>///</b>	<b>√</b> √	<b>///</b>	<b>√</b> √	x	x
Obstacle to oil & g	gas activities		<b>///</b>	<b>/ / /</b>	×	×	<b>√</b> √	<b>√</b> √	×
Benefits to the wid	der renewables sec	tor	+ < < <	+<<<	+ < < <	+<<<	x	?√	+?√
Benefits to the loc	al economy		+?√	+//	+?√	+?√	+?√	×	+<<

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

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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 MOW(E)L ES CUMULATIVE IMPACTS ASSESSMENTS

BOWL and MOW(E)L jointly commissioned ERM in 2011 to produce a Cumulative Assessment Discussion Document (MORL (i.e. MOW(E)L) 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	A11	Negligible	None Proposed	Negligible	Probable	
Introduction of new habitat	A11	Negative minor	None Proposed	Minor	Probable	
Electromagne tic Fields	A11	Negligible	None proposed	Negligible	Probable	
Operational All Noise		Negative Minor	None Proposed	Minor	Probable	

MOW(E)L'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 MOW(E)L's ES.



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

The assessments carried out by BOWL and MOW(E)L, 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)								
MOW(E)L (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 MOW(E)L 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 (including associated cable protection measures) 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 will carry out the re-scheduled cable pull-ins at Portgordon in February 2018. At that time, BOWL will not be carrying out operations in the vicinity at that time. There are therefore no expected simultaneous activities relating to SHE T's cable pull-in activities.
- SHET will carry out the remaining rock placement operations in the areas within the 12nm limit of the Noss and Portgordon coasts, conditional upon receiving the appropriate marine licences, during April and May 2018. BOWL will be installing the second export cable during that time however, any simultaneous operations are expected to be limited to periods of 3 to 4 days when the SHE T rock placement vessel ins on site placing rock.
- SHET will carry out the remaining mechanical (soil) backfill operations in the areas within the 12nm limit of the Noss and Portgordon coasts during May and June 2018. BOWL will have completed the installation of their second export cable by that time. There are therefore no expected simultaneous activities relating to SHE T's mechanical backfill activities.

### SHE T and MOW(E)L:

The subsea portions of the SHE T HVDC cables and the MOW(E)L 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 MOW(E)L wind farm zone.

Both installation programmes are available and indicate the following:

- MOW(E)L's export cable installation activities take place in 2020 i.e. in excess of 1 year after SHE T's cable is put into permanent service. There are therefore no expected simultaneous activities relating to MOW(E)L's export cable installation.
- MOW(E)L'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 MOW(E)L's wind turbine installation.

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# • 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;
- re-scheduling rock placement prior to mechanical backfill to reduce the quantity of rock required to protect the cable;
- · 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;
- the area impacted by SHE T's C-M cable is negligible as a proportion of the total area impacted by BOWL and MOW(E)L;
- 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.

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#### 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 MOW(E)L Installation programmes

## Scottish and Southern Energy

LT21 Caithness HVDC Reinforcement

Schedule of activities Date: 22/12/2017 Doc No.: LT000021-PRG-003 Revision: 12.0 Revision note: Update to include as-built programme up to 31.12.17

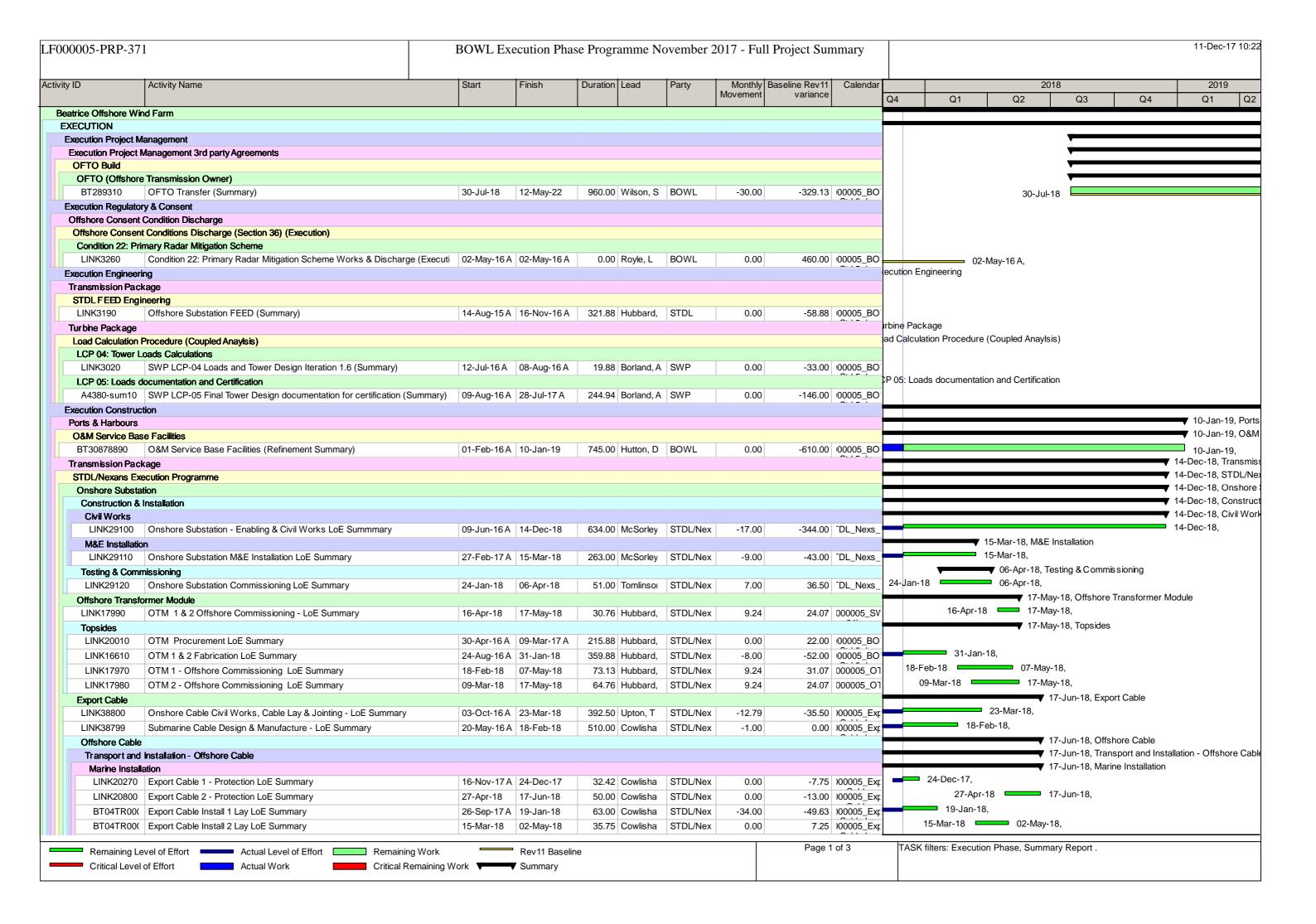
As built Planned

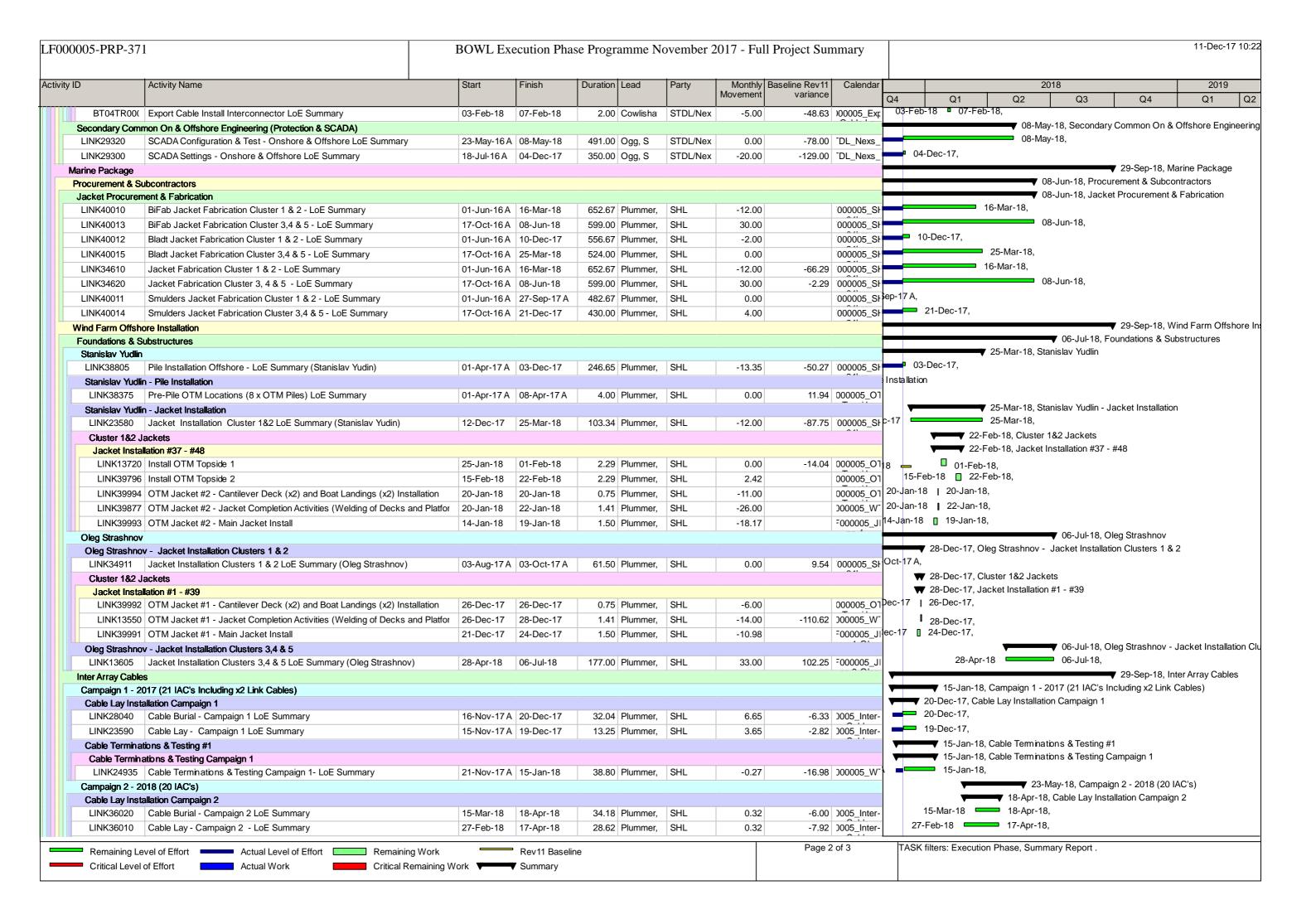
Marine Operations: as-built programme to 31st December 2017

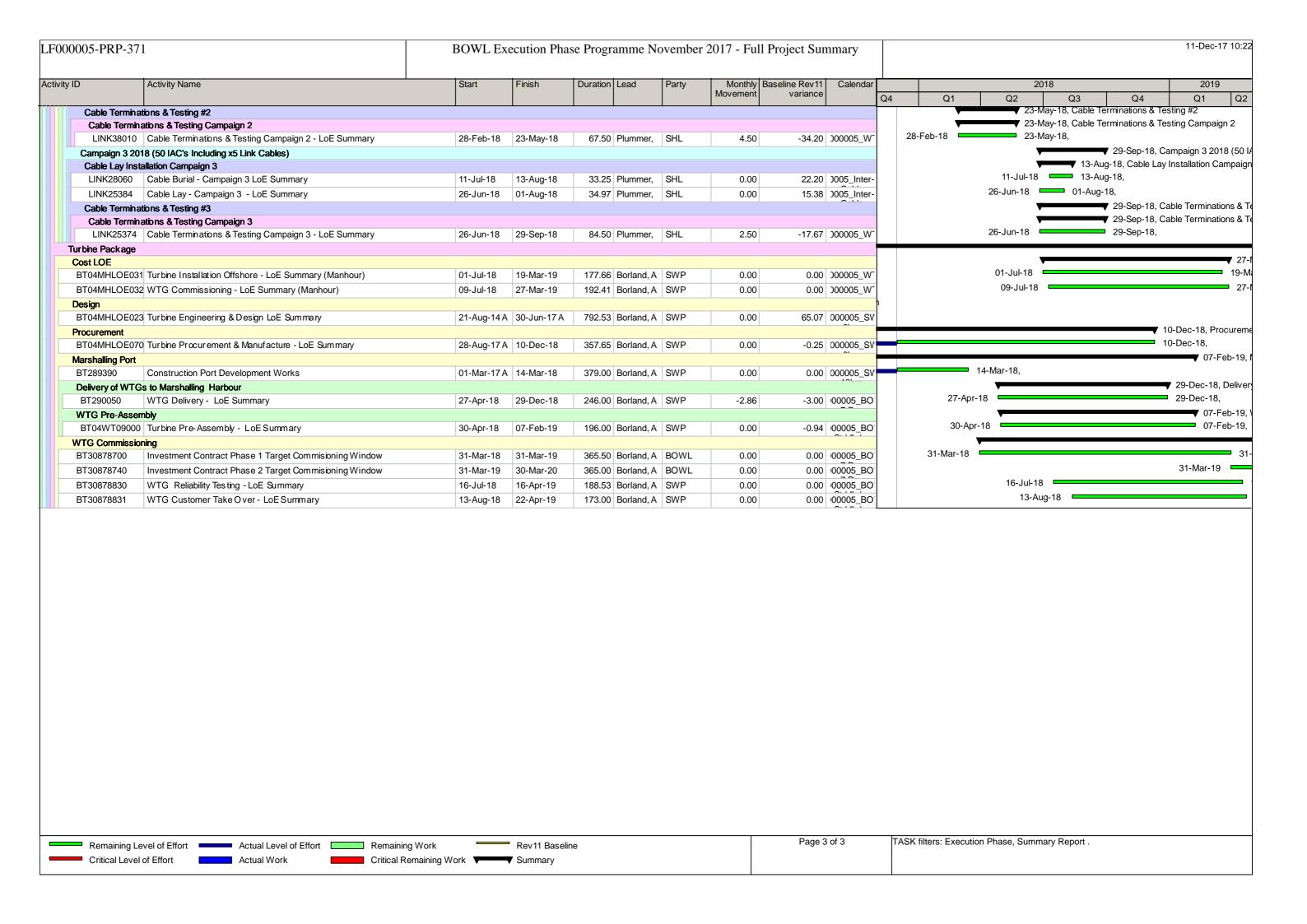
Location	Year			2016									2017 -0								2	018	
Location	Month	August	September	October	November	December	January	February	March	April	May	June 👨	July 🕺	August	September	October	November	December	January	February	March	April &	May June
Portgordon (ch. 0+000)								Boulder clearance	Post boulder clearing sur			et renching first pass	abl  (renching second pass source renching second pass source)	Cable lay cam						Caple pull-in	to be delice to the second	Trench back	ost trench backfill
No boulder clearance, renching or mechanical packfil in this soft soils area. Cable lowering by post lay jet trenching.  Cable joint (ch. 56+500)									post boulder clearing survey  Boulder clearance	Post trenching first pass north Trenching first pass north	Post trenching second pass north  Trenching second pass north  Cable	Lieuthing first bass  Lieuthing first bass  House aurite(y)	hing second pass south  hing second pass south  survey	zalgr No, 2 (incl. survey)		Cable joini		Lat transphysion 2				Rock	Post Trench backfill

## As-built programme dates (up to 31.12.17)

Activity	Start date	Finish date	Duration (days)	1
Boulder clearance	15/02/2017	02/03/2017	15	1
Post boulder clearance survey	22/02/2017	10/03/2017	16	
Trenching first pass north	28/03/2017	21/04/2017	24	
Post trenching first pass north survey	13/04/2017	21/04/2017	8	
Trenching first pass south	09/06/2017	26/06/2017	17	
Post trenching first pass south survey	20/06/2017	27/06/2017	7	
Trenching second pass north	23/04/2017	25/05/2017	32	
Post trenching second pass north surv	14/05/2017	25/05/2017	11	
Trenching second pass south	30/06/2017	11/07/2017	11	
Post trenching second pass south sur	08/07/2017	12/07/2017	4	
Boulder target investigations north	25/05/2017	26/05/2017	1	
Boulder target investigations south	07/07/2017	12/07/2017	5	
Cable pull-in (Portgordon)	27/07/2017	28/07/2017	1	Aborted during 1st pull-in. Will be rescheduled.
Cable lay - campaign 2 (incl. survey)	31/07/2017	06/08/2017	6	
Cable pull-in (Noss)	27/05/2017	28/05/2017	1	
Cable lay - campaign 1 (incl. survey)	28/05/2017	04/06/2017	7	
Post cable lay HMB survey	04/06/2017	05/06/2017	1	
Jet trenching	15/10/2017	30/10/2017	15	
Jet trenching	08/12/2017	17/12/2017	9	
Cable joint	01/11/2017	16/11/2017	15	
Trench backfill	15/04/2018	06/06/2018	52	
Post trench backfill survey	07/06/2018	11/06/2018	4	
Rock placement (outside 12nm)	16/10/2017	23/11/2017	38	Includes survey
Rock placement (Portgordon to 12nm)	01/04/2018	20/04/2018	19	Includes survey
Rock placement (Noss to 12nm)	21/04/2018	31/05/2018	40	Includes survey
Noss Head rock protection	06/10/2017	31/12/2017	86	Includes survey
Guard vessels (varying quantity)	23/04/2017	11/06/2018	414	







		Start	Finish	Duration	2018	2019	2020	2021	2022
ltem	Task	date	date	Calendar days	Jan Mar Apr May Jun Jul Aug Sep Oct	Jan Mar May Jun Jul Sep Oct	Jan Mar May Jun Jul Sep Oct	Jan Mar May Jun Jul Sep Oct	Feb Mar May Jun Jul Sep Oct Dec
	FC	30-Sep-18							
Project Milestones	ION A	16-Sep-20						<u></u>	
	ION B	01-Apr-21 31-Mar-22							_
	Wind Farm Area - CPTUs	05-Nov-17	31-Jan-18	87.00					
	Landfall - Nearshore Survey	12-Mar-18	01-Apr-18	20.00					
Survey Works	Wind Farm Area - OEC route	15-Mar-18	08-Apr-18	24.00					
	Wind Farm Area - IAC Route	08-Apr-18	22-Jun-18	75.00					
	Pre construction Survey	22-Jun-18	21-Aug-18	60.00					
	HV equipment leadtime Installation - Civil Works	17-Dec-18 01-Sep-18	18-Feb-20 04-Mar-20	428.00 550.00					1
	Installation - M&E	25-Oct-19	24-Aug-20	304.00					
Onshore Works	Onshore Cable Installation	08-Nov-18	08-Jul-20	608.00					İ
	Testing & Cold commissioning	16-Dec-19	16-Sep-20	275.00	·				
	Onshore Works Energisation	16-Sep-20	26-Sep-20	10.00					
	Cable Lay	07-Jul-20	29-Sep-20	84.50 68.00					
OECs	Landfall Works OSP Termination and Testing	18-Jul-20 24-Jul-20	24-Sep-20 24-Sep-20	68.00 62.50					
OLC3	Cable Burial	01-Aug-20	01-Oct-20	61.00					1
	OEC Energisation	26-Sep-20	26-Oct-20	30.00					İ
	HV Equipment Leadtime	01-Oct-18	27-Sep-19	361.00					
	OSP Delivery	24-Dec-18	15-Jun-20	539.00					
OSP	Installation Window	01-Jun-20	01-Jul-20	30.00					
	Cold Commissioning Hot Commissioning	01-Jul-20 26-Oct-20	30-Oct-20 15-Nov-20	121.00 20.00					
	Energisation	15-Nov-20	15-Nov-20 15-Dec-20	30.00					1
	Delivery	02-Mar-19	30-Oct-19	242.00					
Piles	Installaiton - NET	01-Apr-19	27-Sep-19	179.00					İ
	Installation - P50	27-Sep-19	03-Nov-19	37.00					
	Delivery	30-Mar-20	21-Sep-20	175.00					
Jackets	Installaiton - NET	01-Jul-20	29-Sep-20	90.00					
	Installation - P50	29-Sep-20	12-Oct-20	13.00					
	Laying - NET	01-Sep-20	13-Nov-20	73.00					
	Laying - P50	13-Nov-20	27-Nov-20	14.00					İ
	Trench&Burial - NET	15-Sep-20	02-Jan-21	109.00					İ
IACs	Trench & Burial - P50	02-Jan-21	07-Jan-21	5.00					
	Testing & Termination - NET	05-Oct-20	27-Dec-20	83.00					
	Testing & Termination - P50	27-Dec-20	14-Jan-21	18.00					İ
	Energisation	15-Dec-20	03-Apr-21	109.86					
	Lead time	03-Jan-19	30-Aug-20	605.00					
	Supply	01-Sep-20	08-Jun-21	280.00					
	Transport	03-Sep-20	11-Jun-21	280.20					
	Pre assembly	07-Sep-20	23-Aug-21	349.90					
	Installation	01-Jan-21	15-Sep-21	257.00					
	M&E	11-Jan-21	23-Sep-21	255.00					
WTG	Energisation	16-Jan-21	26-Sep-21	252.90					
	Commissioning	22-Jan-21	04-Oct-21	255.00					
	Test on Completion (per WTG)	01-Apr-21	14-Oct-21	196.38					
	Technical Issue/Re-testing	14-Oct-21	13-Nov-21	30.00					
	Final TSA Availability Test	13-Nov-21	03-Dec-21	20.00					ĺ
	Taking Over Documentation and Approval	03-Dec-21	12-Jan-22	40.00					
	Facilities Agreement Availability Test	12-Jan-22	01-Feb-22	20.00		ĺ			
Completion Works	OCPs to LCCC and Approval	01-Feb-22	02-Mar-22	29.00					
	COD docs to Lenders and Approval	02-Mar-22	31-Mar-22	29.00					
	PF				I .	1	1	1	