

The logo for Moray East Offshore Windfarm. It features the word "MORAY EAST" in a bold, dark blue, sans-serif font. Below it, the words "OFFSHORE WINDFARM" are written in a lighter blue, sans-serif font. The text is centered and partially overlaid by a large, light blue circular graphic on the right side, which is composed of several curved segments, resembling a stylized sun or a wind turbine hub.

MORAY EAST

OFFSHORE WINDFARM

A decorative graphic consisting of several overlapping, wavy lines in shades of blue and teal, creating a sense of movement and depth, positioned above the main title.

Offshore Transmission Infrastructure Cable Plan

Moray East Offshore Wind Farm Offshore Transmission Infrastructure (OfTI)

July 2021

Moray Offshore Windfarm (East) Limited

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List of Abbreviations

AC	Alternating Current
AIS	Automatic Information System
AtoN	Aids to Navigation
BOWL	Beatrice Offshore Wind Ltd.
CAA	Civil Aviation Authority
CaP	Cable Plan
CBRA	Cable Burial Risk Assessment
cm	Centimetre
CMB	Cable Marker Board
CMS	Construction Method Statement
CoP	Construction Programme
CPS	Cable Protection System
DECC	Department of Energy & Climate Change
DGC	Defence Geographic Centre
DIO	Defence Infrastructure Organisation
DoL	Depth of Lowering
DP	Dynamic Positioning
DSLp	Development Specification and Layout Plan
EPCI	Engineering Procurement Construction Installation
ERCoP	Emergency Response Cooperation Plan
ES	Environmental Statement
FI	Flashing
FO	Fibre Optic
HDD	Horizontal Directional Drill
HDPE	High Density Polyurethane
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IPS	Intermediate Peripheral Structure
JNCC	Joint Nature Conservation Committee
LAT	Lowest Astronomical Tide
KP	Kilometre Point (with KP 0 at the TJB)
LMP	Lighting and Marking Plan
m	Metre
MCA	Maritime and Coastguard Agency
Met Mast	Meteorological Mast

MFE	Mass Flow Excavator
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
ml	Millimetre
MOD	Ministry of Defence
Moray East	Moray Offshore Windfarm (East) Limited
MS-LOT	Marine Scotland - Licensing Operations Team
MVAC	Medium Voltage Alternating Current
NLB	National Lighthouse Board
nm	Nautical mile
NOTAM	Notice to Airmen
NSP	Navigational Safety Plan
NVIS	Night Vision Imaging System
O&M	Operation and Maintenance
OEC	Offshore Export Cable
OFCOM	Office of Communications
OfTI	Offshore Transmission Infrastructure
OfTI CaP	Offshore Transmission Infrastructure Cable Plan
OFTO	Offshore Transmission Owners
OMP	Operation and Maintenance Programme
OREI	Offshore Renewable Energy Installation
OSP	Offshore Substation Platform
PLGR	Pre-Lay Grapnel Run
Q	Quick
ROV	Remotely Operated Vehicle
RPL	Route Position List
S	Second
SAR	Search and Rescue
SHET	Scottish Hydro Electric Transmission PLC
SNH	Scottish Natural Heritage
SPS	Significant Peripheral Structure
TI	Transmission Infrastructure
TJB	Transition Joint Bay
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
V	Very

VMP	Vessel Management Plan
W	White
WTG	Wind Turbine Generator
Y	Yellow

Definitions

The following definitions have been used throughout this document with respect to the company, the consented wind farms and how these definitions have changed since submission of the Moray East Environmental Statement (ES) in 2012; the Moray East Modified Transmission Infrastructure ES in 2014 and the Moray East Offshore Substation Platform (OSP) Environmental Report in 2017.

- **Moray Offshore Windfarm (East) Limited (formerly known as Moray Offshore Renewables Limited)** – the legal entity submitting this Offshore Transmission Infrastructure (OfTI) Cable Plan;
- **Moray East Offshore Wind Farm** - the wind farm to be developed in the Moray East site (also referred as the Wind Farm);
- **The Moray East site** - the area in which the Moray East Offshore Wind Farm will be located. Section 36 Consents and associated Marine Licences to develop and operate up to three generating stations on the Moray East site were granted in March 2014. At that time the Moray East site was made up of three sites known as the Telford, Stevenson and MacColl offshore wind farm sites. The Section 36 Consents and Marine Licences were subsequently varied in March 2018 with the Marine Licences additionally varied in July 2019 and April 2020, October 2020 (MacColl) and November 2020 (Telford and Stevenson);
- **Telford, Stevenson and MacColl wind farms** – these names refer to the three consented offshore wind farm sites located within the Moray East site;
- **Transmission Infrastructure (TI)** - includes both offshore and onshore electricity transmission infrastructure for the consented Telford, Stevenson and MacColl wind farms. Includes connection to the national electricity transmission system near New Deer in Aberdeenshire encompassing Alternating Current (AC) offshore substation platforms (OSPs), AC OSP interconnector cables, AC export cables offshore to landfall point at Inverboyndie continuing onshore to the AC collector station (onshore substation) and the additional regional Transmission Operator substation near New Deer. A Marine Licence for the offshore TI was granted in September 2014 and a further Marine Licence for two additional distributed offshore substation platforms (OSPs) was granted in September 2017. The onshore TI was awarded Planning Permission in Principle in September 2014 by Aberdeenshire Council and a Planning Permission in Principle under Section 42 in June 2015. In June 2018 Aberdeenshire Council granted Approval of Matters Specified in Conditions for both the cable route and substation;
- **Offshore Transmission Infrastructure (OfTI)** – the offshore elements of the transmission infrastructure, comprising AC OSPs, OSP interconnector cables and AC export cables offshore to landfall (for the avoidance of doubts some elements of the OfTI will be installed in the Moray East site);
- **Moray East ES 2012** – The ES for the Telford, Stevenson and MacColl wind farms and Associated Transmission Infrastructure, submitted August 2012;
- **Moray East Modified TI ES 2014** – the ES for the TI works in respect to the Telford, Stevenson and MacColl wind farms, submitted June 2014;
- **The Development** – the Moray East Offshore Wind Farm and Offshore Transmission Infrastructure (OfTI);
- **Design Envelope** - the range of design parameters used to inform the assessment of impacts;
- **OfTI Corridor** – the export cable route corridor, i.e. the OfTI area as assessed in the Moray East Modified TI ES 2014 excluding the Moray East site; and

- **the Applications** – (1) the Application letter and ES submitted to the Scottish Ministers on behalf of Telford Offshore Windfarm Limited, on 2nd August 2012 and the Additional Ornithology Information submitted to the Scottish Ministers by Moray Offshore Renewables Limited on the 17th June 2013; (2) the Section 36 Consents Variation Application Report for Telford, Stevenson and MacColl Offshore Wind Farms dated December 2017 and (3) the Marine Licence Applications and associated documents submitted for the OfTI Licences.

- **Moray East Offshore Wind Farm Consents** – are comprised of the following:

Section 36 Consents:

- Section 36 consent for the Telford Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Telford Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the Stevenson Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Stevenson Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the MacColl Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the MacColl Offshore Wind Farm assigned to Moray East on 19 June 2018.

Marine Licences

- Marine Licence for the Telford Offshore Wind Farm (as varied) – Licence Number: MS-00009051 (formally 04629/18/1 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- Marine Licence for the Stevenson Offshore Wind Farm (as varied) – Licence Number: MS-00008985 (formally 04627/18/1 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- Marine Licence for the MacColl Offshore Wind Farm (as varied) – Licence Number: MS-00008972 (formally 04628/18/2 - granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.

- **OfTI Licences** – are comprised of the following:

- Marine Licence for the Offshore Transmission infrastructure – Licence Number MS-00008919 (formally 05340/14/0 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OfTI Marine Licence”)
- Marine Licence for two additional distributed OSPs – Licence Number 06347/17/1 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction, operation and maintenance works and the deposit of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OSP Marine Licence”)

Executive Summary

This Offshore Transmission Infrastructure Cable Plan (OfTI CaP) has been prepared to address the specific requirements of the relevant condition attached to the OfTI Marine Licence issued to Moray Offshore Windfarm (East) Limited (Moray East).

The cable plan addresses each part of the condition as set out in Section 1.2.1 and provides supporting specifications, engineering, planning and construction details to confirm alignment with the original Application. A separate Wind Farm Cable Plan has been produced for the Moray East Offshore Wind Farm. Details of the Offshore Substations Platform (OSP) interconnector cables are primarily set out in the Wind Farm Cable Plan. Where this OfTI CaP provides information in relation to the OSP interconnector cables then this is clearly identified in the relevant sections.

1 Introduction

1.1 Background

Section 36 Consents were granted in March 2014 for the construction and operation of three offshore wind farms (Telford, Stevenson and MacColl) within the Moray East site. Marine Licences for the three offshore wind farms were granted in September 2014 (together the Section 36 Consents and Marine Licences for the Wind Farm are referred to as the Moray East Offshore Wind Farm Consents). Moray East was granted a Marine Licence for two Offshore Substation Platforms (OSPs) in September 2014 (OfTI Marine Licence) and in 2017 a Marine Licence was granted for two additional distributed OSPs (OSP Marine Licence) (together these licences are referred to as the OfTI Licences). This OfTI Cable Plan (OfTI CaP) is also submitted in accordance with the OfTI Marine Licence.

Moray East is a joint venture partnership between EDP Renewables, Engie and Diamond Generating Europe and has been established to develop, finance, construct, operate, maintain and decommission the Moray East Offshore Wind Farm.

1.2 Objectives of this Document

The OfTI Marine Licence contains a variety of conditions that must be discharged through approval by the Scottish Ministers prior to the commencement of offshore construction. One such requirement is the approval of a Cable Plan, referred in this document as the OfTI CaP. The relevant conditions setting out the requirement for a CaP for approval are set out in full in Table 1-1 below.

This document is intended to satisfy the requirements of OfTI Marine Licence conditions by providing an OfTI CaP that can be practically implemented during the construction and operation phases of the Development. This OfTI CaP covers the offshore export cables (OEC) and a separate Wind Farm CaP has been produced to cover the inter-array cables and the OSP interconnector cables (Moray East, 2019). The OSP interconnector cables have been included within the Wind Farm CaP on the basis that that a single contractor has been selected for the engineering and installation of the inter-array and OSP interconnector cables (with a consistent approach for the design and installation of the cables within the Moray East site).

The objective of the document is to provide supporting descriptions, data and evidence that the planning for the installation and operation of the OECs within the Moray East site and OfTI Corridor are in accordance with the required consent conditions.

Table 1-1: Consent conditions to be discharged and reference sections

Consent Document	Condition Reference	Condition Text	Reference in this Cable Plan
OfTI Marine Licence	3.2.2.10	The Licensee must, no later than 6 months prior to the Commencement of the Works, submit CaP, in writing, to the Licensing Authority for their written approval. Such approval may only be granted following consultation by the Licensing Authority with the JNCC, SNH, MCA, and the SFF and any such other advisors or organisations as may be required at the discretion of the Licensing Authority. The CaP must be in accordance with the Application. The CaP must include the following:	This document sets out the OfTI CaP for approval by the Scottish Ministers.
		a. Details of the location and cable laying techniques for the cables;	Sections 3, 9 and 10

Consent Document	Condition Reference	Condition Text	Reference in this Cable Plan
		b. The results of survey work (including geophysical, geotechnical and benthic surveys) which will help inform cable routing;	Section 8
		c. A pre-construction survey for Annex 1 habitat and priority marine features to inform cable micro-siting and installation methods in consultation with the Licensing Authority and their advisors;	Sections 8 and 9
		d. Technical specification of all cables, including a desk based assessment of attenuation of electro-magnetic field strengths and shielding;	Sections 7 and 11
		e. A burial risk assessment to ascertain if burial depths can be achieved. In locations where this is not possible then suitable protection measures must be provided;	Section 10
		f. Methodologies for over trawl surveys of the cables through the operational life of the Works where mechanical protection of cables laid on the sea bed is deployed; and	Sections 11 and 13
		g. Measures to address exposure of any cables.	Sections 10 and 12

1.3 Cable Plan Scope

This OfTI CaP covers the following areas, in line with the requirements of the OfTI Marine Licence condition 3.2.2.10:

- The technical specification of OECs and overall cable system including the thermal and electromagnetic field impact;
- OEC and OSP route description (for the OSPs and interconnector cables see Wind Farm CaP);
- The results of survey work including geophysical, geotechnical, UXO and benthic surveys which will help inform cable routing;
- The cable burial risk assessment results and measures to provide cable protection;
- Pre-cable installation enabling and route preparation works;
- Cable laying techniques for the OECs;
- The method of cable burial and / or protection; and
- Measures which will be employed to monitor and address potentially exposed OEC throughout the life of the wind farm.

1.4 Cable Plan Document Structure

In response to the specific requirements of the OfTI Marine Licence condition 3.2.2.10, this OfTI CaP has been structured to clearly set out how each part of the specific requirements has been met and that the relevant information to allow the Scottish Ministers to approve the OfTI CaP has been provided. The document structure is set out in Table 1-2 below.

Table 1-2: Document Structure

Section		Summary of Contents
1	Introduction	Sets out the background, objectives and aims of the OfTI CaP, including the consent conditions related to the OfTI CaP.
2	Statements of Compliance	Sets out the statements of compliance in relation to the OfTI CaP consent conditions and the broader construction process.
3	Project Overview	Provides an overview of the whole project as background.
4	Timing of Construction Works	Sets out the key construction milestones.
5	Overall Construction Management	Sets out the manner of offshore construction management, coordination, operation and control.
6	OEC Supply and Installation Contractor	Identifies the key contractors and subcontractors for the OfTI installation.
7	OEC Specifications	Provides details of the cable specifications and the results of external electromagnetic field assessment.
8	Site Investigations	Provides information relating to survey work and routing of the OEC.
9	Cable Routing	Details the key constraints considered within route engineering and describes the geophysical, geotechnical and benthic surveys conducted to inform cable routing.
10	Cable Burial Risk Assessment	Provides details of the cable burial risk assessment conducted to determine the burial targets.
11	Requirements for the Design of the OEC Third Party Cable Crossing	Provides details on the crossing of the SHET HVDC cable.
12	Cable Installation Methodology	Briefly summarises the OEC installation methods.
13	Export Cable Operation and Maintenance	Sets out the operation and maintenance programme and remedial procedures in the event that the cables become exposed, damaged or fail.
14	Compliance with the Application	Sets out information from the Modified TI ES 2014 with regard to compliance.
15	Updated Cable Trenching Methodology	Provides a comparison of the Modified TI ES 2014 assessment of the OEC and the worst case scenario (WCS) assessment resulting from the proposed OEC installation tools.
16	References	Details all references used to develop this OfTI CaP.

1.5 Linkages with other consent plans

The consent conditions that require the development of a CaP do not explicitly identify linkages between this and other consent plans. However, other conditions require that several consent conditions plans be consistent with the OfTI CaP; these plans are identified in Table 1-3 below.

Table 1-3: Cable Plan consistency and links to other consent plans

Condition	Consent Plan	Consistency with and linkage to CABLE PLAN
Section 36 Condition 10; OfTI Marine Licence Condition 3.2.2.4	Construction Method Statement (CMS)	The purpose of the CMS is to detail the methods that will be implemented during the construction of the Development. The cable installation and burial methods detailed are consistent with the OfTI CaP.
Section 36 Condition 26; OfTI Marine Licence Condition 3.2.1.1	Project Environmental Monitoring Programme (PEMP)	Provides an overview of seabed scour and local sediment deposition monitoring. This shall be consistent with the OfTI CaP.
Section 36 Condition 12; OfTI Marine Licence Condition 5.2.6; and OSP Marine Licence Condition 3.2.2.7	Design Specification and Layout Plan (DSLPL)	The details provided on the design, layout and specifications of the OECs shall be consistent with the OfTI CaP.
Section 36 Condition 16; OfTI Marine Licence Condition 5.3.2 and OSP Marine Licence Condition 3.2.3.11	Operation and Maintenance Programme (OMP)	The OMP sets out the procedures and good working practices for the operational and maintenance (O&M) phase of the Development. The OMP must be consistent with the OfTI CaP.
Section 36 Condition 18	CaP (Wind Farm)	The Wind Farm CaP sets out evidence that the installation and operation of the inter-array cable network within the Wind Farm site are in accordance with the required consent conditions. The OfTI CaP and Wind Farm CaP must be consistent.

2 Statements of Compliance

The following statements re-affirm the Moray East commitment to ensuring that the Development is constructed and operated in such a manner as to meet the relevant legislative requirements set out by the Section 36 Consents and OfTI Marine Licence.

2.1 Statements of Compliance

Moray East in undertaking the construction and operation of the Development will ensure compliance with this OfTI CaP as approved by the Scottish Ministers (and as updated or amended if required).

Where significant updates or amendments to this OfTI CaP are required, Moray East will ensure the Scottish Ministers (and relevant stakeholders) are informed as soon as reasonably practicable and where necessary the OfTI CaP will be updated and amended.

Moray East in undertaking the construction and operation of the Development will require compliance with other relevant consent condition plans as approved by the Scottish Ministers and identified in Section 1.5 above.

Moray East in undertaking the construction and operation of the Development will ensure compliance with the limits defined by the original Applications (including the project descriptions defined in the Moray East ES 2012 and Modified TI ES 2014) referred to in Annex 1 of the Section 36 Consents and Part 2 of the OfTI Marine Licence and in so far as they apply to this OfTI CaP (unless otherwise approved in advance by the Scottish Ministers) (see Section 2.2 below).

Moray East will, in undertaking the design and construction of the Development, require compliance with the approved OfTI CaP (and all other relevant, approved Consent Plans) by the key contractors and subcontractors through condition of contract and by an appropriate auditing process.

2.2 Management of Change to the OfTI Cable Plan

Should there be a reason to modify methodologies brought about during the engineering stages of the project, such changes will be made to this document and resubmitted following the same review process as described above.

As required by the Marine Licence conditions, any updates or amendments made by the Licensee, will be submitted, in writing, by the Licensee to the Licensing Authority for their written approval.

3 Project Overview

The OfTI Marine Licence requires that the OfTI CaP includes the following:

“Details of the location and cable laying techniques for the cables.”

This section provides a brief overview of the Development relevant to the OfTI CaP, including details of the location, and sets out the main roles and responsibilities in relation to Moray East and the key contractors. Details of the cable laying techniques are provided in Section 12.

3.1 Development Overview

The Development will consist of the following main components:

- A total generating capacity of approximately 950 MW, however the total generation capacity will be constrained by the Development’s grid connection transmission entry capacity of 900 MW (further details provided within the DSLP (Moray East, 2018b));
- 100 WTGs of no greater than 10 MW (further details provided in the DSLP);
- Jacket substructures each installed on three pile foundations driven into the seabed;
- Three AC OSPs to collect the generated electricity and transform the electricity for transmission to shore;
- A network of buried or (if sufficient burying is not possible) mechanically protected, subsea inter array cable circuits to connect strings of turbines together and to connect the turbines to the OSPs (as defined in the Wind Farm CaP (Moray East, 2019));
- Two buried or (if sufficient burying is not possible) mechanically protected subsea inter-connector cable circuits that link the OSPs to one another;
- Three buried or (if sufficient burying is not possible) mechanically protected subsea export cable circuits to transmit the electricity from the OSPs to the landfall at Inverboyndie Bay and connecting to the onshore buried export cable circuits for transmission to the onshore substation and connection to the national electricity transmission system; and
- Minor ancillary works such as the deployment of met buoys and permanent navigational marks as defined in this OfTI CaP.

An overview of the OfTI boundary within the Moray Firth is provided in Figure 3-1 below.

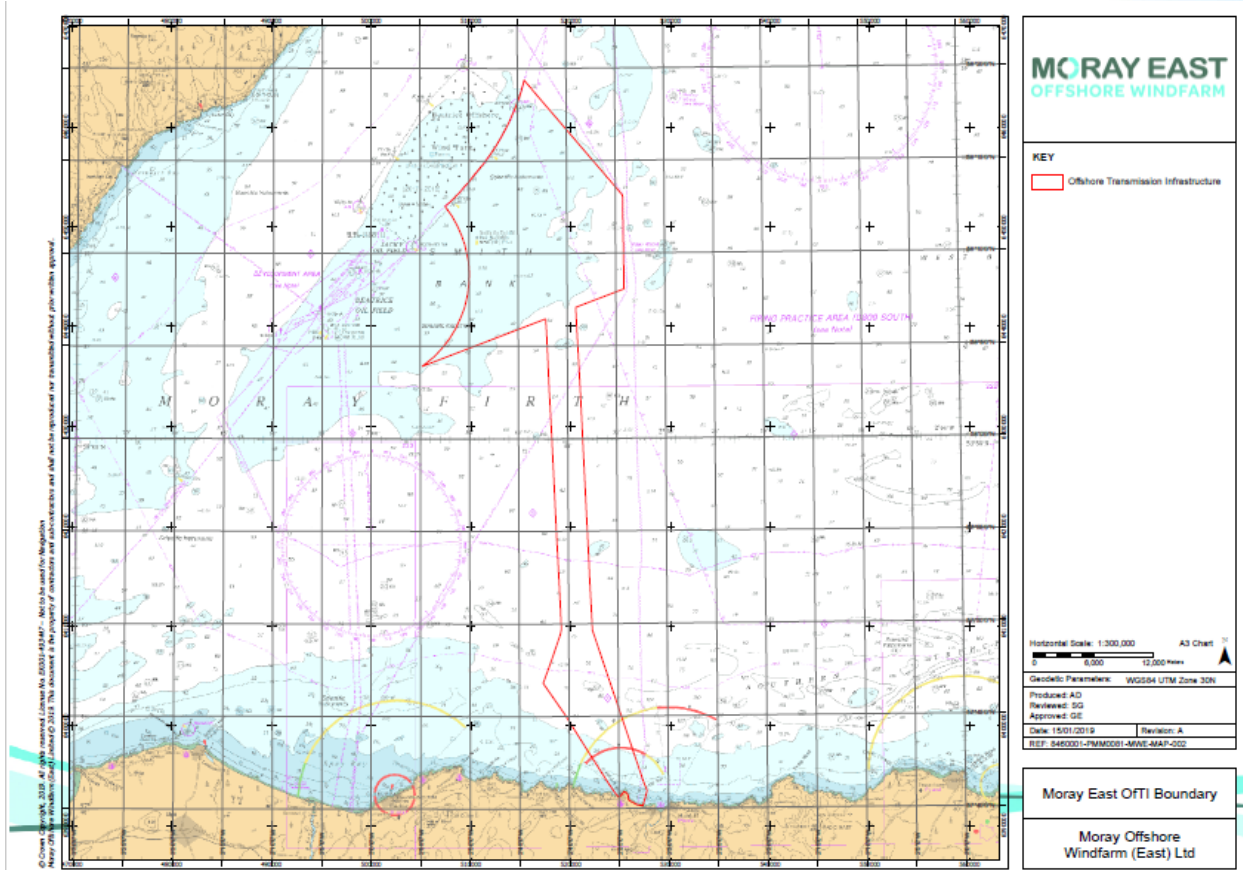


Figure 3-1: Overview of the OfTI Boundary

3.2 Project Location and Layout

Figure 3-2 below shows the final layout of WTGs and OSPs across the Moray East site, as detailed within the DSLP (Moray East, 2020a) upon which this OfTI CaP is based. Further information on the layout of the Moray East site, including the specifications of the WTGs and OSPs and the location coordinates of each structure, is provided in the DSLP (Moray East, 2020a). Note that Figure 3-2 includes up to 9 spare locations. These spare locations would only be utilised in the event of difficulties being encountered during the foundation installation operations at one of the WTG or OSP locations that could not be otherwise overcome by micro-siting. Moray East will ensure that the OfTI CaP is aligned with the DSLP in case of any amendments to any of the documents. The information presented with this document is currently aligned with version 5 of the DSLP (submitted September 2020).

Moray Offshore Windfarm (East) Limited OfTI Cable Plan

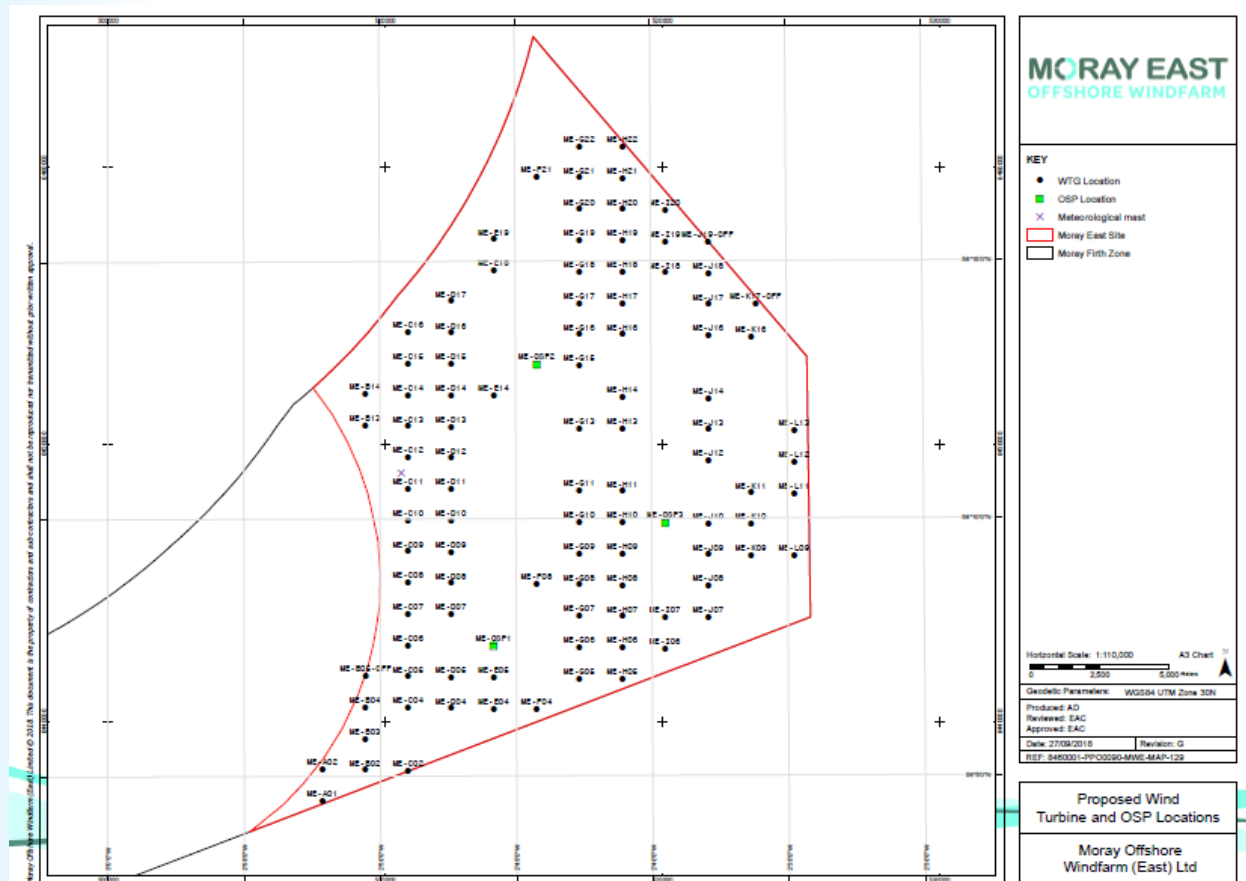


Figure 3-2: WTG and OSP Layout (at date 09-10-2018)

Figure 3-3 below shows the final layout of three OECs from landfall into the Moray East site, subject to confirmation through final project design and engineering work, upon which this OfTI CaP is based.

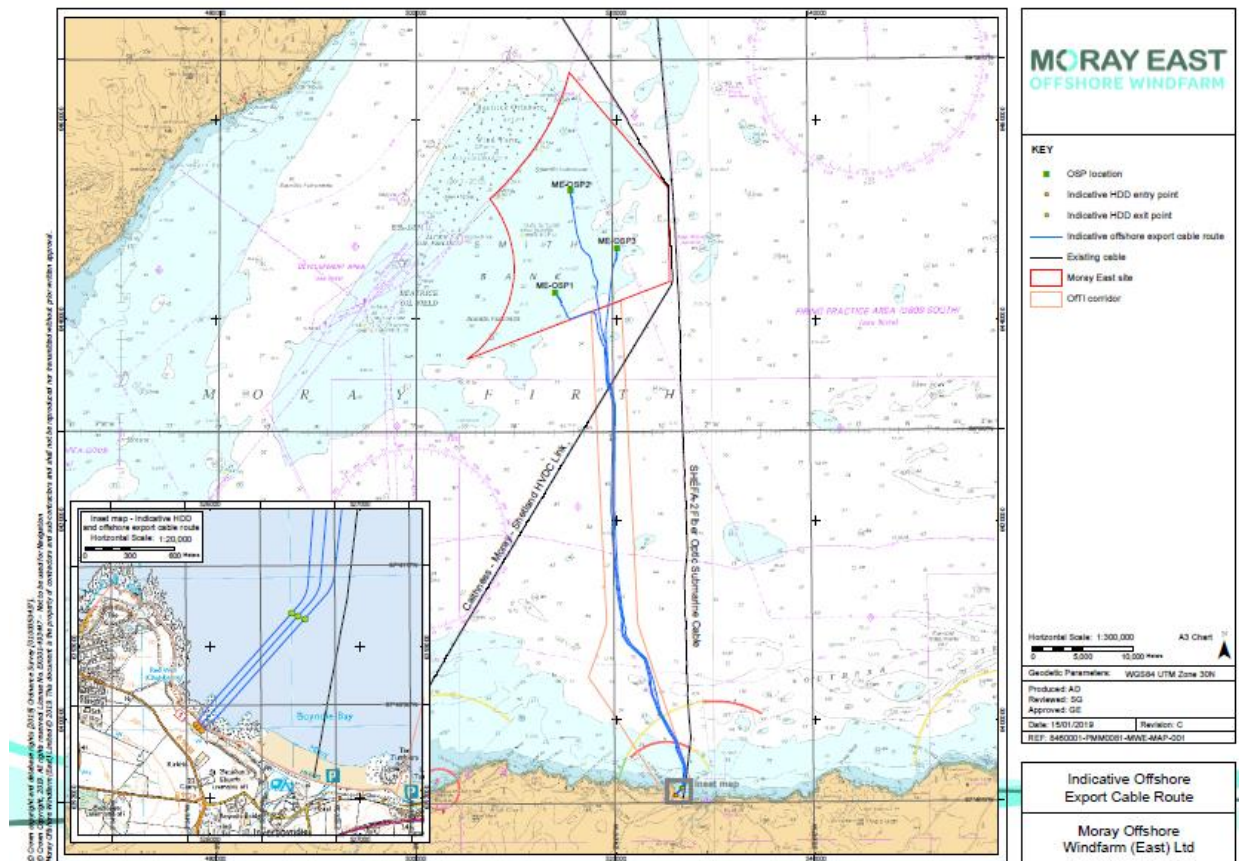


Figure 3-3: Offshore Export Cable Routes within the OfTI Corridor.

4 Timing of Construction Works

This section provides an overview of the Moray East Offshore Wind Farm development (as consented under the Section 36 Consents and OfTI Licences) and presents the key milestone dates for the commencement of works, the main construction activity and the commissioning of the wind farm.

Construction works for the OECs will be undertaken as detailed in Table 4.1 (and up to date at time writing). Full details of the construction programme are provided in the combined Construction Programme (CoP) and Construction Method Statement (CMS) document (Moray East, 2020b), updated as relevant.

Table 4-1: Summary of key milestone dates

Milestone	Anticipated Programme
Mobilisation of Plant and Delivery of Materials	To match installation timings as set out below
Timing and Sequencing of Construction Work, inclusive of all cable terminations and commissioning	<p>Horizontal drilling from onshore to offshore and installation of ducts at landfall:</p> <ul style="list-style-type: none"> May 2019 – November 2019 <p>OSP Pile Foundations:</p> <ul style="list-style-type: none"> June 2020 <p>OSP Jackets installation:</p> <ul style="list-style-type: none"> June 2020 <p>OSP Topsides installation:</p> <ul style="list-style-type: none"> June 2020 – October 2020 <p>Export Cable laying:</p> <ul style="list-style-type: none"> May 2020 – October 2020
Full Generation	October 2021
Final Commissioning of OfTI	October 2021

5 Overall Construction Management

The overarching offshore construction management of the OEC installation works will be coordinated under a centralised Moray East Marine Co-ordination function. Daily planning, movements, operations and permitting will be the responsibility of the function which will provide 24-hour coverage during the construction phase of the project.

The daily work planning and sequencing of offshore operations, vessels, crew transfer, equipment movement and permit applications as well as applicable safe systems of work is the responsibility of the key cable installation contractors; details of which are set out in Section 6 below.

6 Offshore Export Cable Supply and Installation Contractors

6.1 Key Contractors

The OEC supply, installation and completions works will be carried out under an Engineering, Procurement, Construction and Installation (EPCI) contract between Moray East and NKT HV Cables AB (NKT). NKT is a leading subsea cable manufacturing and installation contractor with significant experience in the offshore wind market.

The combined CoP and CMS document (Moray East, 2020b) provides an overview of the key Wind Farm and OfTI contractors.

6.2 Key Subcontractors

The cable burial activities for the OECs will be carried out by Deep Ocean Ltd, subcontracted to NKT.

Installation of horizontal directional drilling pipes (HDDs) will be carried out by an experienced, specialist HDD installation contractor, subcontracted to NKT.

Examples of other services that may need to be subcontracted include support vessels, guard vessels, survey services, transport services, supply of minor components, waste services, vessel provisioning and bunkering services, and provision of equipment to be used in the construction works.

7 Offshore Export Cable Specifications

The OfTI Marine Licence requires that the OfTI CaP includes the following:

“Technical specification of all cables, including a desk based assessment of attenuation of electro-magnetic field strengths and shielding.”

The following section provides information relating to the specification and design of the OEC. Electro-magnetic field strengths and shielding is considered in Section 11.

7.1 OEC Cable Overview

A total of three export cables will be installed to the three OSPs. The cables will be nominated from West to East as ME-OSP1 (56.2 km), ME-OSP2 (63.3 km) and ME-OSP3 (57 km), (the lengths specified are indicative and subject to micro-routing) (Figure 3-3 above).

The OECs connect to the onshore export cable circuits at transition joint bays (TJBs), located above Mean High Water Springs at the cable landfall site in Boyndie Bay, which will form the 0 (zero) point for the offshore cable lay.

At this shore end, three HDD ducts are to be constructed well in advance of cable installation, that exit at approximately -10 m LAT, some 1000-1100 m offshore.

The route is designed as expediently as possible from the HDD exit point toward the OSPs. Along the route at kilometre point (KP) 45, or 45 kilometres from the TJBs, there is one subsea asset (a buried power cable owned and operated by Scottish Hydro Electric Transmission (SHET), the SHET HVDC cable, which runs from Caithness to Moray) to be crossed by the Moray East OEC.

At the OSPs, each OEC accompanied with a cable protection system will be pulled into and through a steel J-tube with a bellmouth approximately 2-3 m above seabed, with sufficient cable being pulled up onto the OSP to allow for it to be connected to the termination point on the topside unit of the OSP. The cable protection system (CPS) is utilised as an installation aid and protection for the cable against “dynamic” movement over time.

It is intended that the cables are each to be laid in one continuous length with no offshore joints.

7.1.1 Key Cable Data

For the purpose of installing cables within the HDD ducts up to 27 m depth, the cable properties will be using conductor cross sectional areas of 1000 mm² for the section installed by HDD and for the main offshore subsea cable. The joint between the two will be performed in the factory in order that no offshore jointing operation is required.

The following table provides pertinent data for the OECs.

Table 7-1: Key export cable data

Parameter	HDD 1000 mm ² Size	1000 mm ² Size	Unit
Cable Outer Diameter	240	240	mm
Conductor Material	Aluminium	Aluminium	
No. of individual cable	3 (1 per export circuit)	3 (1 per export circuit)	
Number of power cores within each individual export cable	3	3	-

Parameter	HDD 1000 mm ² Size	1000 mm ² Size	Unit
Total Installed Cable Length	4,500 (HDD)	176,315 (from HDD to OSPs)	m
Allowable Bending Radius (during installation)	5	5	m
Safe working axial load (pulling)	330	162	kN
Weight / m (in air)	74	74	Kg/m
Weight / m (in seawater)	42	42	Kg/m

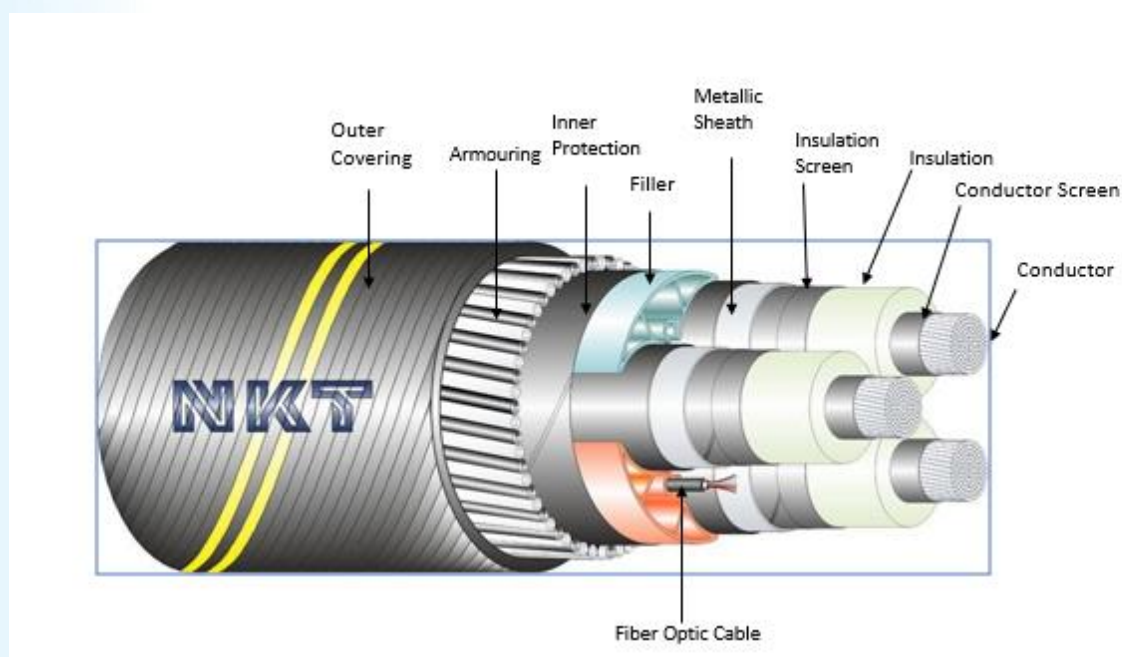


Figure 7-1: Indicative Offshore Export Cable configuration.

7.2 Export Cables Design and Construction

NKT have undertaken to design a 220kV OEC for the Moray East Offshore Wind Farm. The HVAC OECs will be delivered in one length between each OSP and TJB at the landfall.

The main part of the submarine cable will be installed buried in the seabed, including a short crossing of the SHET HVDC cable. At the OSP a short section will be installed in a J-tube through a CPS, and at the landfall the cable will be installed through a HDD duct.

Due to the increased cable burial depth at the landfall within the HDD ducts (up to 27 m depth below seabed level) this section constitutes the most onerous area of the whole route in terms of current rating. It is anticipated that following detailed engineering for the final HDD depth and length, the cable type to be installed in these three short sections will be 1000 mm².

7.2.1 Power Cores

The cable design is a high voltage alternating current (HVAC) for 220kV, with Aluminium stranded conductors (3 phases) and XLPE (cross-linked polyethylene) insulation.

7.2.2 Fibre Optic

The constructed cable will contain the associated metallic screens, sheaths, bindings and fibre optic elements, one fibre optic cable will be integrated into the three-core submarine cable. The fibre optic cable includes minimum 48 single mode fibres.

7.2.3 Armour wires and outer roving

The armouring of the cable, will consist of galvanized steel and polyethylene. The armour layer is soaked in bitumen. The outer layer consists of one inner layer of polypropylene yarns soaked in bitumen and one outer layer of black polypropylene yarns with helical laid lines in high visibility colours as marking.

7.2.4 Cable Protection System at the OSP

A cable protection system will be designed, procured and installed at the OSP ends of the OEC. Its purpose is to protect the cable where it is in a free span zone, from the structure j-tube exit location and into burial. In this zone, the cable is affected by dynamic environmental loads (waves and current). The system protects the cable from these loads and also provides impact protection.

The design will consist of a combination of polyurethane, cast iron, and polymer elements.

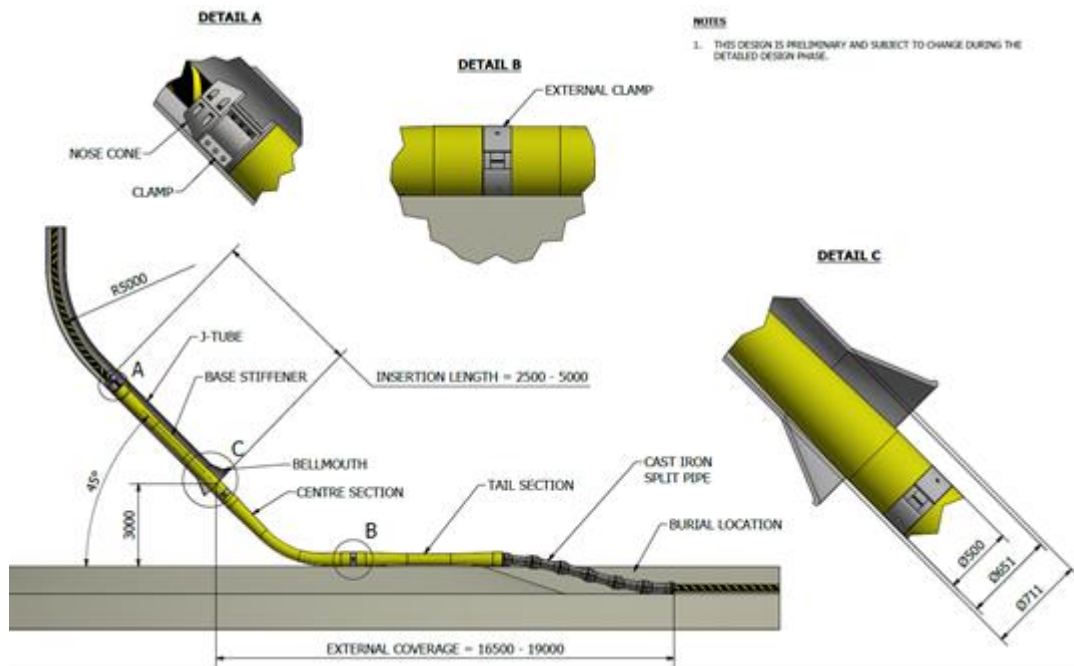


Figure 7-2: Indicative Cable Protection System.

7.2.5 Landfall Horizontal Directional Ducts

Ducts will be pre-installed at the landfall following HDD, to allow installation of the OECs underneath the landfall point. This will be 630 mm SDR17 HDPE100 Cable Duct formed as circa 1,100 m long extruded sections. Further information is provided within the CoP & CMS Document (Moray East, 2020c).



Figure 7-3: Example of HDPE duct been floated into HDD.

8 Site investigations

The OfTI Marine Licence requires that the OfTI CaP includes the following:

“The results of survey work (including geophysical, geotechnical and benthic surveys) which will help inform cable routing; and

A pre-construction survey for Annex 1 habitat and priority marine features, to inform cable micro-siting and installation methods in consultation with the Licensing Authority and their advisors.”

The following section provides information relating to survey work and routing of the OEC. The section provides information on key constraints identified through survey.

8.1 Development Surveys

Table 8-1 below is taken from the Moray East PEMP (Moray East, 2018), and represents all relevant documents and data files utilised in the process of developing the cables routes and burial requirements.

Table 8-1: Baseline Bathymetry and Geological Data

Survey	Survey Detail	Coverage	Date
Moray East site (relevant to the sections of the OEC located within the Moray East site)			
Geophysical Survey (Osiris Projects)	Multi-Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer / Gradiometer.	100 % of the Moray East site.	2010
Deep Geotechnical Site Investigation (Fugro)	Composite boreholes.	19 Boreholes across the Moray East site.	2010
Geophysical Survey (Gardline)	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer / Gradiometer.	50 m corridor along possible inter- array cable routes.	2014
Shallow Geotechnical Site Investigation (Gardline)	Vibrocores and Cone Penetration Testing (CPTs)	43 Stations between possible WTG locations.	2014
Deep and Shallow Geotechnical Site Investigation (Calegeo)	Composite Boreholes and CPTs	26 Boreholes and 75 CPTUs stations within and around possible WTGs locations).	2014
Geophysical Survey (Horizon)	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer	Infilling Survey in the eastern part of the site, 3 lines going through WTG locations	2017
Geotechnical Survey (Horizon/Fugro)	Sampling Boreholes, downhole CPT reading	19 sampling boreholes, 88-92 downhole CPT readings across the Moray East site	2017/2018

Survey	Survey Detail	Coverage	Date
Geophysical Survey & Shallow Geotechnical Site Investigation	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer/ Gradiometer Seabed CPTs and vibrocores	100 m corridor along possible inter- array cable routes, shallow CPTs & vibrocores along inter-array cable routes	2018
Unexploded Ordinance (UXO) Survey (Bibby HydroMap)	Multi- Beam Echo Sounder, Side Scan Sonar, Magnetometer/ Gradiometer	Moray East site.	2018-2019 (in progress)
Offshore Corridor [relevant to sections of the OEC located within the OfTI Corridor]			
Geophysical Survey (Gardline)	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer/ Gradiometer	1000 m corridor along the export cable route	2014
Shallow Geotechnical Site Investigation (Gardline)	Vibrocores and CPTUs	68 stations along the export cable route	2014
Topographic Beach Survey (Gardline)		Topographic coverage of an area around 250 m x 300 m	2014
Nearshore Shallow Geotechnical Site Investigation (Gardline)	CPTs	21 CPTs along the cable route in the nearshore area	2015
Nearshore Geophysical (Bibby HydroMap)	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer/ Gradiometer	Coverage over an area of 800 m x 425 m	2017
Nearshore Geotechnical Site Investigation	Deep geotechnical survey using jack – up vessel with a full complement of drilling and testing equipment. Boreholes including cable percussion methods, SPTs and rotary coring.	25 m target depth for six offshore boreholes to encounter bed rock in the nearshore area. Furthest borehole location was approx. 1 km from shore following the OEC route.	2018
Geophysical Survey & Shallow Geotechnical SI	Multi- Beam Echo Sounder, Side Scan Sonar, Sub- Bottom Profilers, Magnetometer/ Gradiometer Seabed CPTs and vibrocores	Infilling survey for part of the OEC route, mainly inside the side boundaries	2018-2019
Unexploded Ordnance (UXO) Survey (Bibby HydroMap)	Multi-Beam Echo Sounder, Side Scan Sonar, Magnetometer/ Gradiometer.	50m- 100m width along Export Cable Routes and 470m x475m in the nearshore area	2018-2019

Bathymetry will be measured for engineering requirements prior to installation; this will provide a suitable baseline from which to monitor any future changes in seabed topography.

8.1.1 Geophysical coverage

Bathymetry surveys were undertaken along the OfTI Corridor to inform the initial route planning in 2014 and 2017 and to revalidate and micro route in 2018 as per figures 8-1 and 8-2 below.

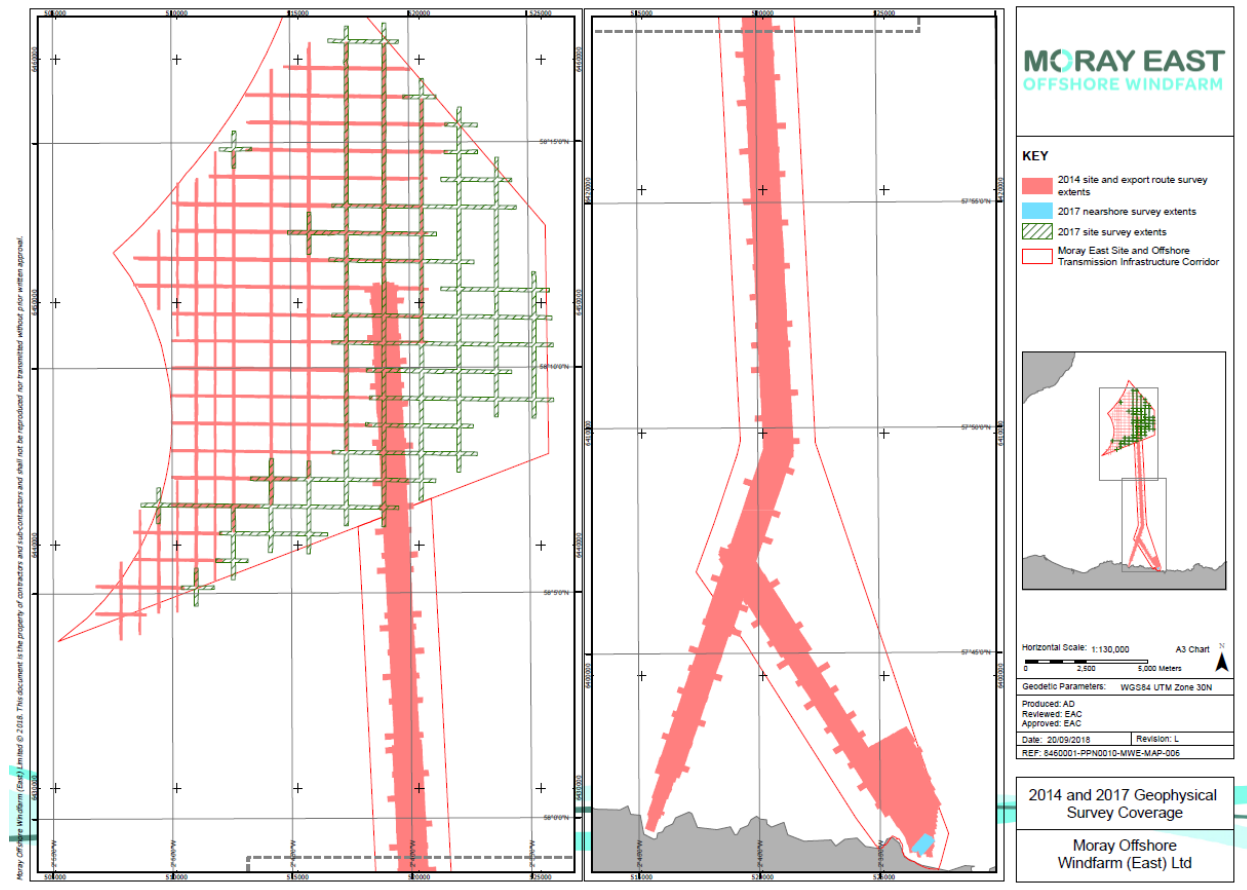


Figure 8-1: Geophysical Coverage 2014 and 2017.

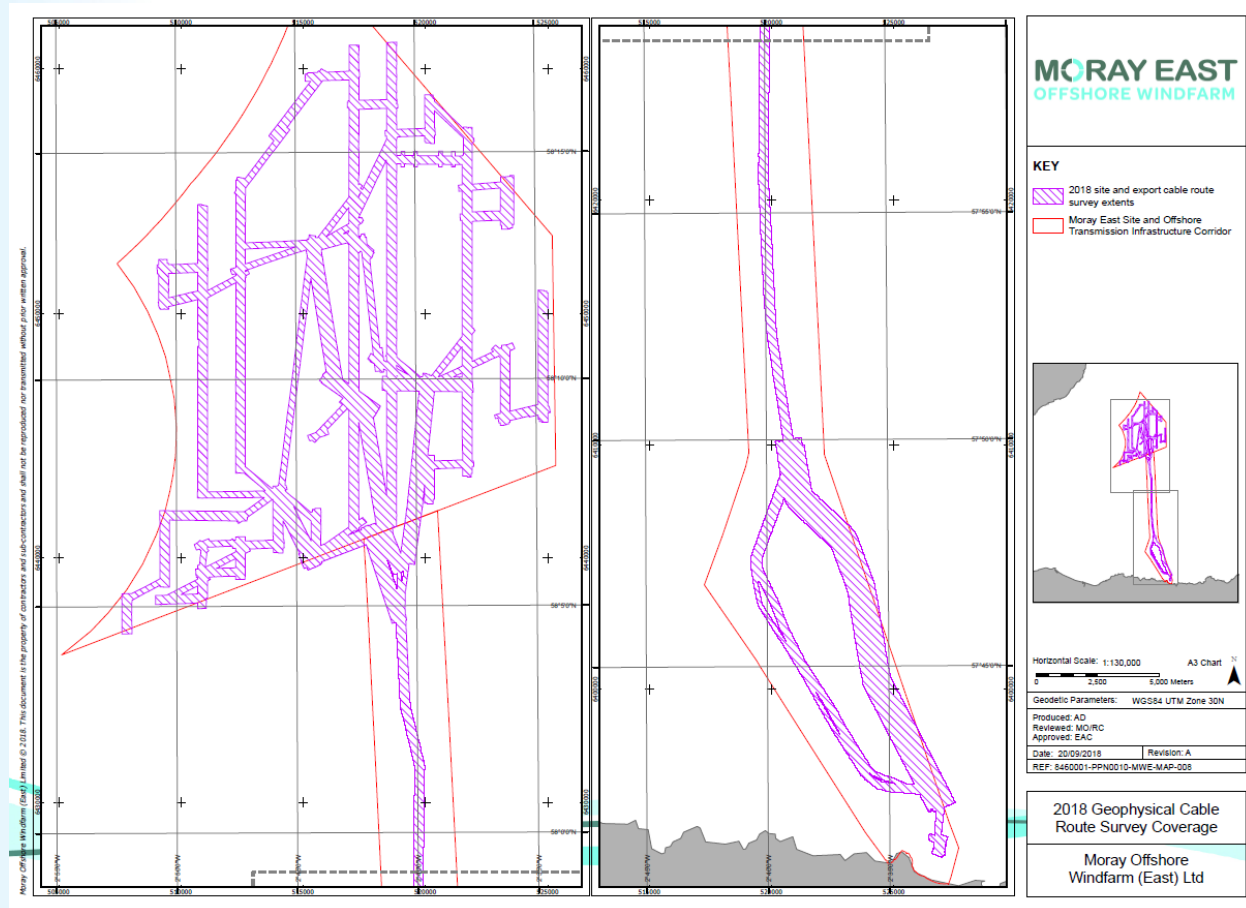


Figure 8-2: Geophysical Coverage 2018.

8.1.1.1 Bathymetric characterisation

From shoreline, water depths increase along the export corridor from ~10mLAT at ~KP1.1 to a maximum of ~-100 mLAT at ~KP12. The seabed then undulates for several kilometres, with a shallow point of ~-60m LAT at KP27 before undulating and descending to ~-88 mLAT at KP32. The seabed then gently shallows towards and entering the array, being ~-56 mLAT at KP47 and shoaling to between -40m and -50 mLAT inside the array. Figure 8-3 provides information on the bathymetry along the OfTI Corridor.

Many boulders are recorded along the OfTI Corridor, with numerous 'boulder fields' (see Section 12.1.14 below). These are associated with areas of seabed sediment interpreted as boulder clay and gravel and sand.

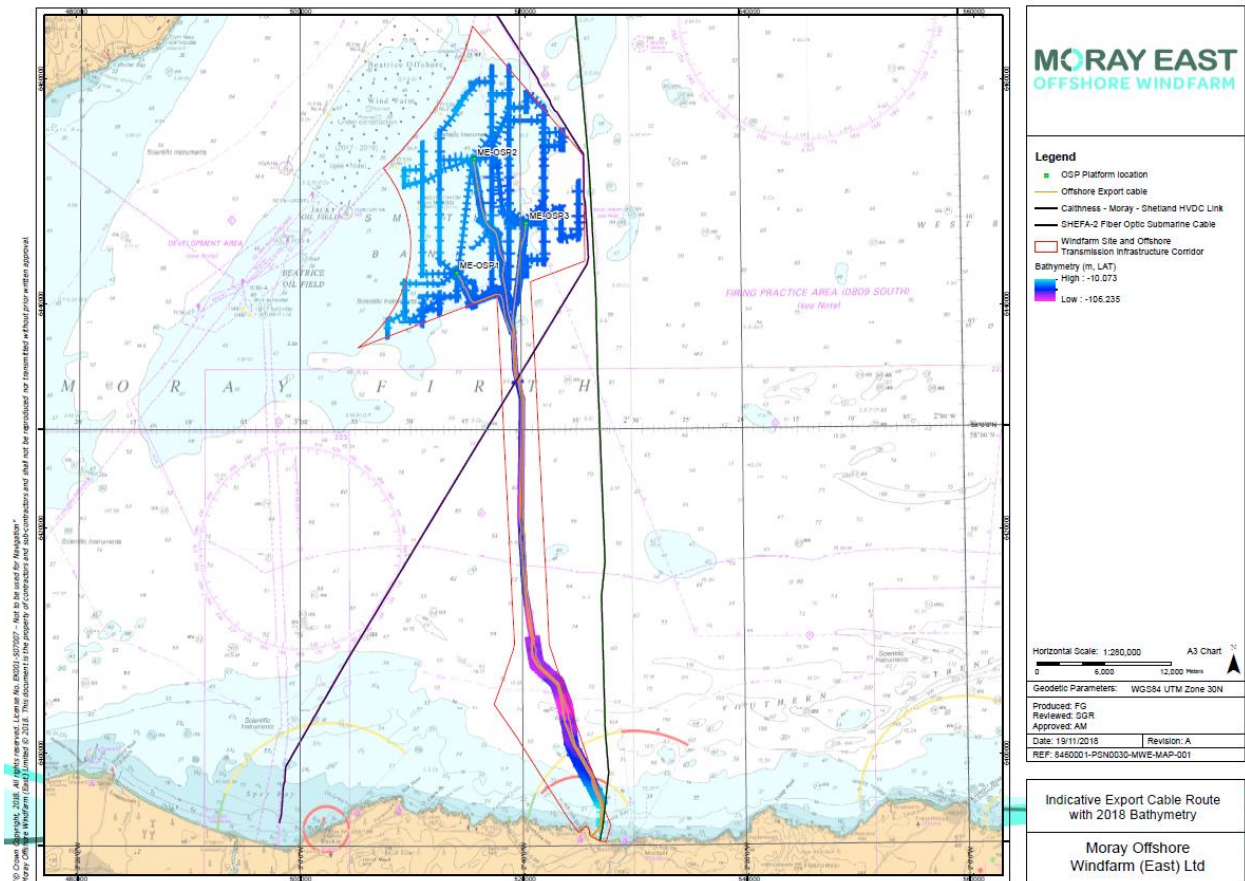


Figure 8-3: Indicative Offshore Export Cable Route with Bathymetry 2018.

8.1.2 Geotechnical coverage

Vibrocore and CPT (cone penetration tests) were undertaken along the OfTI Corridor to inform the initial burial risk assessment planning in 2014, and to revalidate and micro route in 2018 as per Figure 8-4 below.

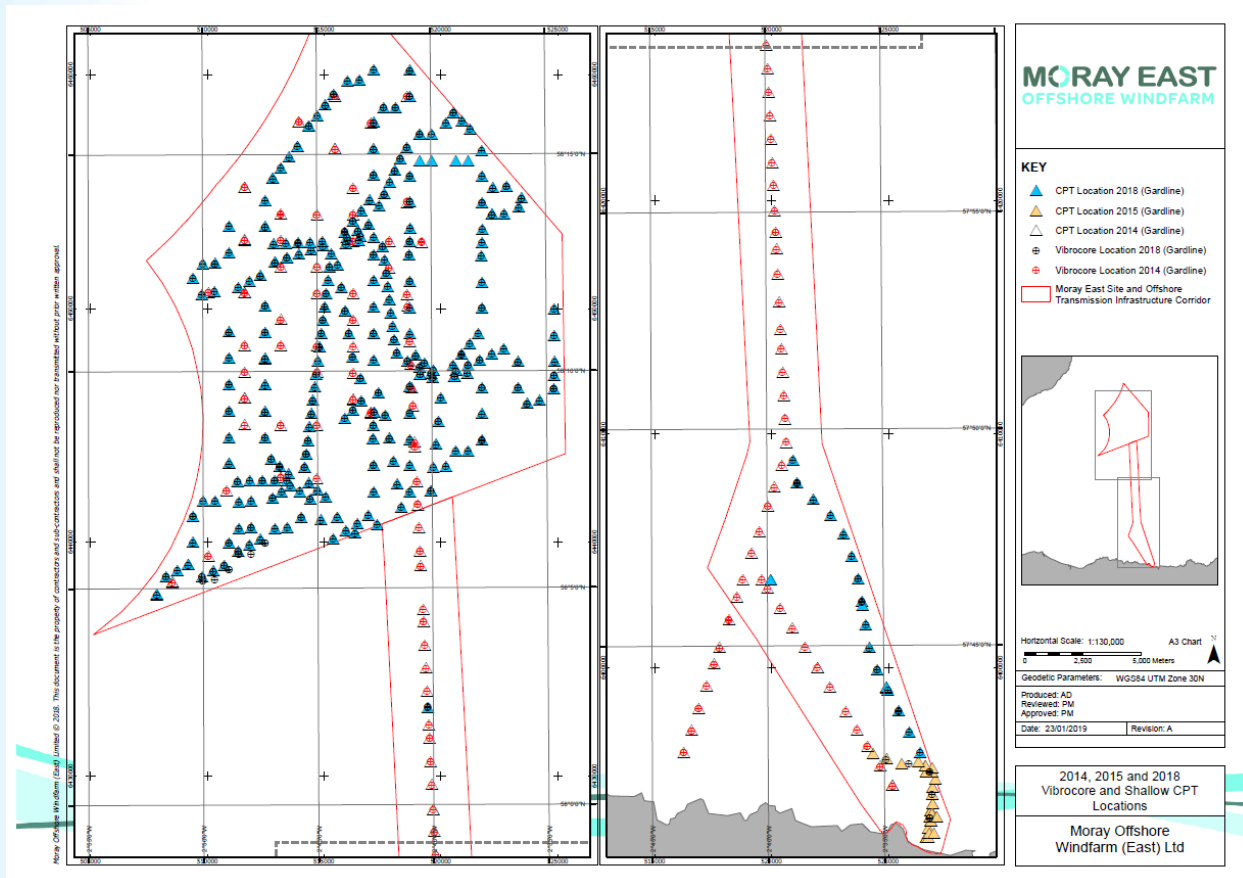


Figure 8-4: Geotechnical Coverage 2014 - 2018.

8.1.2.1 Shallow geology

A veneer of Holocene sand, with gravel and mud content overlies clay, and varies in thickness from 0.5 m for the majority of the route and thins above sub-cropping / outcropping quaternary deposits as imaged by the geophysical survey. Localised outcrops of Boulder Clay at seabed surface are noted between KP1.5 and KP2.25, between KP7.4 and KP12.3, and between KP24.1 and KP31.4 (KP values are relevant to the central route OEC2).

8.2 Benthic Surveys

Benthic ecology data for the export cable route were collected in 2014, using digital video and stills cameras (Export Cable Route Biotope Assessment, Appendix 2). Observations of the borehole samples collected during the geotechnical campaigns (Section 8.1.2 above) were used to corroborate the seabed video/photographic data. Section 9.4 below provides detail on the cable routing and benthic analysis.

8.3 UXO Survey and Clearance

As part of the 2018 site investigation a survey using multi-beam echo sounder, side scan sonar, and magnetometer has been conducted to identify any potential UXO targets on the Moray East site and OfTI Corridor. The preliminary cable routes have been surveyed and any identified potential UXO will be further investigated and if required removed from the OEC route prior to construction commencement.

9 Cable Routing

9.1 Objectives

The main objectives during the engineering of Moray East OEC routes can be identified as follows;

- Consideration of all the constraints within the consented OfTI Corridor that bound the cable route such as anomalies identified by geophysical surveys, or existing infrastructure on the seabed;
- Minimising likelihood of interactions with fishing activities and shipping exclusion zones etc if applicable;
- The shortest or most efficient path between different offshore assets (WTGs and the OSPs);
- Reduction in the number of alter courses (curve in route) to reduce installation time, and cable damage risk;
- Mitigation of identified hazards by avoidance or sympathetic routing;
- Mitigation of identified known undesigned cultural heritage assets such as wrecks by micrositing and re-routing in order to avoid them;
- Consideration of all constraints regarding operational limitations (slope, offset distance, turning radius); and
- Additional consideration for the radius of routes to allow for the post lay trenching activities.

9.2 Constraints

Route constraints are viewed as three types; hard constraints, soft constraints and operational constraints.

Hard constraints are those based upon such items as existing infrastructure exclusion zones and required buffers to facilitate anchoring of the installation barge. These hard constraints governed the space remaining within the export cable corridor in which the route could be engineered.

The identified hard constraints on the route consist of:

- Cable crossing with SHET (all three cables will cross this system once at the same location) HVDC;
 - HV interconnector cable between convertor stations in Spittal in Caithness, and Blackhillock in Moray
 - Cable runs SW-NE across the route at KP43 (43 km from shore end at Invergordon)
 - Cable is buried to 1m at crossing point
- TJB locations (3) at landfall;
- OSP locations (3);
- WTG locations (~100);
- Other in field array cables (100); and
- Other cables in proximity (1) the SHEFA 2 cable
 - Fibre Optic Cable routing from the beach at Boyndie Bay to Faroe Islands via Orkney and Shetland

- Cable is buried to 1m and proximity is 75m East of the most easterly cable route.

Soft constraints are those which require mitigation via routing; this can also be accommodated via displacement / relocation of the constraint or varying installation methods. Where possible soft constraints are mitigated via routing, though consideration is also given to where significant savings on cable length or vessel time can be made by transiting through soft constraints and selecting to displace / relocate them.

Operational constraints are dependent on the installation method and available offshore assets / equipment (such as trenchers). Operational constraints can be seen as additional hard constraints, which cannot be avoided due to their nature such as bending radii for route deviations and the drafts of cable laying and trenching vessels (in order to maintain sufficient under keel clearances).

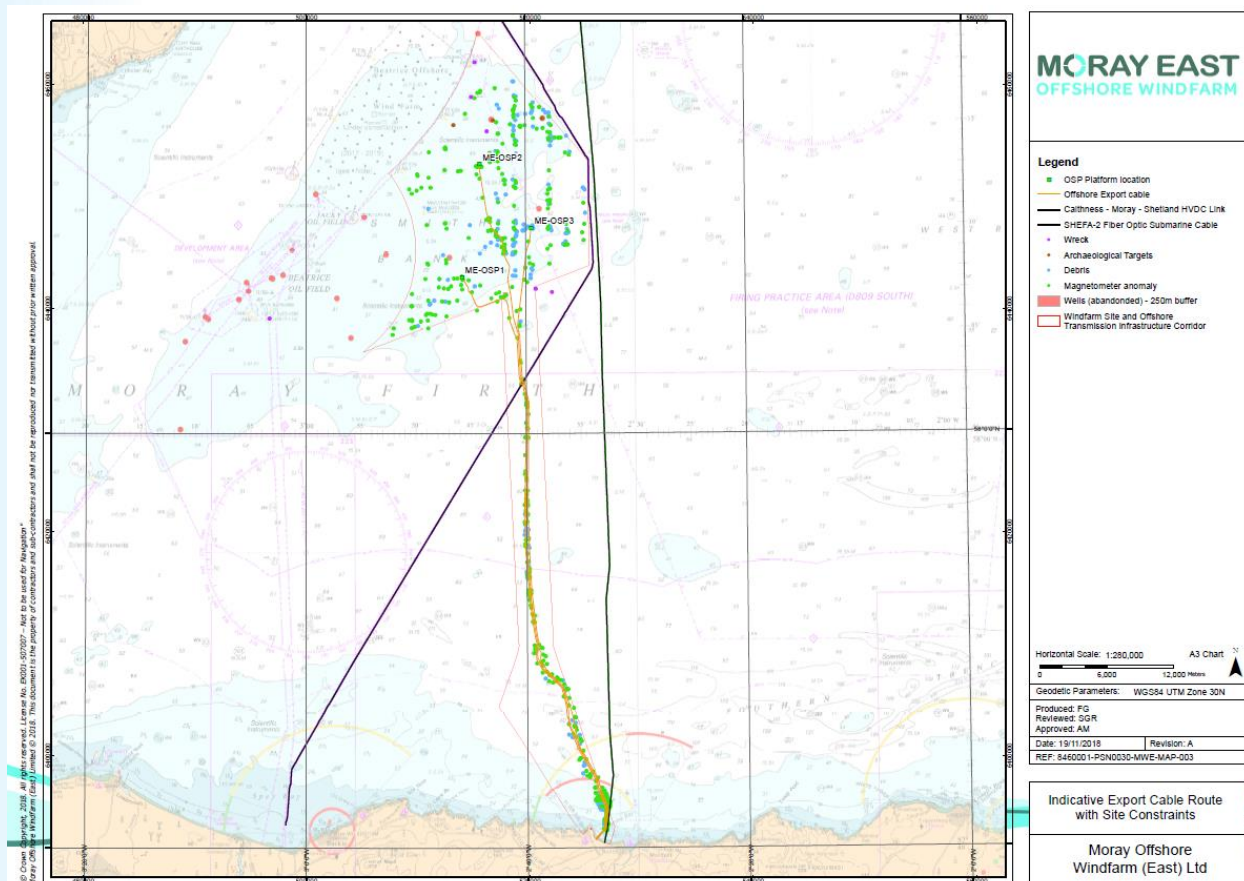


Figure 9-1: Offshore Export Cable Route Indicative Key Constraints.

9.3 Cable routing and unexploded ordnance

Each of the three OECs (one from each OSP) converge immediately south of the Moray East site and, from there as they traverse down to the landfall, the maximum separation distance between each of the three OEC circuits (where no major seabed constraints exist) is approximately four times water depth along the OfTI Corridor (see Figure 3-3). The maximum cable corridor width, from one outer circuit to the other outer circuit, is expected to be up to 1,200 m.

A number of surface contacts were identified within the OfTI corridor by geophysical surveys in 2018. These contacts are comprised of boulders and magnetic contacts.

The appointed OEC installation contractor and Moray East project team performed a joint micro routing study to establish which contacts modelling as UXO could be avoided, and which require further inspection.

A UXO specific site investigation campaign is taking place in early 2019 with the purpose of inspecting each target and assessing whether the item is UXO or not and thereafter assessing whether any UXO can be avoided or required to be detonated (subject to a separate Marine Licence).

9.4 Benthic analysis of cable route

Four habitats / biotopes were classified within the OfTI Corridor, although these often occurred both singly and as twinned mosaics:

- Level 3 main habitat SS.SSa (subtidal sands and muddy sand);
- Level 4 biotope complex SS.SMx.CMx (circalittoral mixed sediment);
- Level 5 biotope SS.SMu.CFiMu.SpNMeg (seapens and burrowing megafauna in circalittoral fine mud); and
- Level 6 Sub-biotope CR.MCR.EcCr.FaAlCr.Pom (faunal and algal crusts with *Pomatoceros triqueter* and sparse *Alcyonium digitatum* on exposed to moderately exposed circalittoral rock).

In addition, it was noted that some areas of the OfTI Corridor comprised a dominant muddy sand substrate which was overlaid by veneers of coarser sand and gravelly sand of various thicknesses. This resulted in a patchwork or mosaic of sediment biotopes across some areas. From the video and stills images it appeared that the overlying deposits were transient and / or mobile, as indicated by the presence of coarse sediment ripples or waves lying over the finer sand substrata.

The main biotope (SS.SSa) and the biotope complex (SS.SMx.CMx) are broad classifications encapsulating a range of more detailed biotope types some of which may have been present within the study area at a finer spatial scale.

The Level 5 SS.SMu.CFiMu.SpNMeg biotope was attributed to the majority of the OfTI Corridor below approximately the 50 m contour based on the widespread occurrence of “sea-pen and burrowing megafauna communities” evident from the video and stills images. The SS.SMu.CFiMuSpNMeg biotope is a component of the “burrowed mud” habitat which is a priority marine feature (PMF) in Scotland and which is one of a number of PMF’s identified by the Scottish nature conservation agencies to help focus conservation action within Scotland’s seas.

The CR.MCR.EcCr.FaAlCr.Pom biotope is illustrative of the Annex I (EC Habitats Directive 92/43/EEC) geogenic reef and includes areas of cobbles, boulders and rocky outcroppings.

Observations of subtidal mixed coarse sediments and muddy sand sediments match historic records of this area, with two broad habitats and two detailed biotopes being classified and mapped by the acoustic and seabed video data. The two detailed biotopes are indicative of valued seabed features including a Scottish PMF and an Annex I (EC Habitats Directive) habitat.

9.5 Final Cable route definition and micro-siting

Following the outcome of further engineering works and surveys, minor modifications to the Route Position List (RPL) and protection of the OEC may be proposed; however, these are not likely to result in significant changes to this OfTI CaP. As described within Section 2.2 above, this OfTI CaP will be reviewed in case of significant changes in the information provided. Once operational, final as built data will be provided to the UKHO for aviation and nautical charting purposes. Discussions are also ongoing with the fishing industry regarding how best this information can be shared.

10 Cable Burial Risk Assessment

Condition 3.2.2.10 of the OfTI Marine Licence requires that the OfTI Cable Plan includes the following:

“A burial risk assessment to ascertain if burial depths can be achieved. In locations where this is not possible then suitable protection measures must be provided.”

The primary means of protecting the cables from the hazards that are presented to the cable, both natural (seabed mobility, wave action etc.) and man-made (shipping, fishing etc.), will be achieved by lowering of the cable into the seabed (burial). Secondary measures of protection which may be required are also detailed in this report and consist of the use of rock armour and CPS.

A Cable Burial Risk Assessment (CBRA) for the Moray East site and OfTI Corridor was completed in 2015 by Senergy ‘Burial assessment and trenching Risk Assessment Export Cable Corridor’ (Senergy, 2015)2303-MOR-TEC-06-02 (Rev 2 – 29-1-15) to establish the target cable lowering depth relative to mean seabed level in order to procure the cable installation contract.

This CBRA was re-validated in 2018 ‘C950R02-03 Moray East Offshore Windfarm Export Cable CBRA 08-10-2018 Rev 03’ (Finalised October 2018) in order to more accurately define the zones of burial, and to further define required burial depths to aid installation. This further development of the CBRA was initiated following recommendations within the original Senergy report to perform surveys for additional bathymetry data (to assist seabed mobility analysis), and to obtain a longer period of AIS ship tracker data to validate vessel types and frequencies upon which the Senergy report was based.

In summary, both risk assessments consider all potential hazards that are presented to the OEC (as described in the following section), and as such the level of protection afforded by the seabed soils (or soil strength) when the cable is lowered into the seabed to a particular depth.

This section of the OfTI CaP provides the information available to date. Should significant changes arise from the results of the 2018 engineering analysis then the OfTI CaP will be updated accordingly.

10.1 Minimum burial requirements for the OEC

10.1.1 Consideration for Commercial Fisheries

A hazard assessment of the site determined that commercial fishing vessels and commercial and marine service vessels are the most common operators within the vicinity of OfTI Corridor. These are considered within the CBRA.

The predominant fishing types in the area are demersal trawling (otter trawling) for nephrops, squid and finfish and scallop dredging. Some limited lobster/crab potting activity occurs in inshore areas. Interaction with demersal fishing gear such as otter board trawls has been assumed to have the potential to cause localised damage to the export cables if not protected. The probability of damage is dependent upon the trawl gear dimensions and cable (armour) specifications. It is also important to consider that exposed cables pose a risk to the fishing equipment and fishing vessels if snagged on a significant obstruction such as a cable.

A detailed fishing study was undertaken on behalf of Moray East in June 2015. As part of the CBRA an AIS dataset for the export cable routes has been examined with specific reference to fishing vessels. The vessel tracks indicate that fishing activity appears to be occurring in particular parts of the site which are investigated in the CBRA.

To protect the cables from fishing gear damage and to prevent snagging, the following minimum burial depths below a reference seabed level (or non-mobile layer) are advised. It has been calculated that these depths would protect the cable against impact and snagging from all types of demersal fishing gear indicated to be in use in the area, as discussed above:

- 0.2 m in sand or high strength clay (>40kPa)
- 0.3 m in low strength clay (<40kPa)

That these calculations have been incorporated into the target Depth of Lowering which is discussed below in 10.1.3.

10.1.2 Consideration for Commercial Shipping

To assess the potential impact of shipping on the proposed OfTI Corridors, an analysis of AIS data for the Moray Firth (in the vicinity of the OfTI Corridor and Moray East site) for a 5 year period up to 2018 was undertaken through the CBRA. This is to gain a greater understanding of seasonal shipping frequencies (noting that monthly and yearly variation in shipping traffic is likely).

Being designed to penetrate the seabed to achieve a holding capacity, anchors can be particularly damaging to cable systems. The closest anchoring zone to the OfTI Corridor is at Banff Harbour, approximately 1 km or 0.5 nm from the edge of the consented corridor.

The results of the vessel traffic informed the CBRA. Additional information on designated anchoring sites is detailed in the Vessel Management Plan (VMP) and Navigational Safety Plan (NSP) document (Moray East, 2020c). The principal risk from anchoring lies in the occasions where a vessel is forced to anchor due to mechanical failure or the need to prevent collision. These are taken into consideration in the calculations within the CBRA assessment.

10.1.3 Target Depth of Lowering

The CBRA has been conducted in accordance with the Carbon Trust, Cable Burial Risk Assessment Methodology, Guidance for the preparation of Cable Burial Depth of Lowering specification, CTC835. The following recommendations are made on the minimum depth of lowering which is required to protect the OEC circuits.

The geology along the OfTI Corridor is a key consideration in the CBRA as it influences the depth of penetration of significant hazards e.g. anchoring and fishing activities.

Target burial depths have been established based on threat lines (depths of interaction) for fishing and vessel anchors transiting across the OfTI corridor. An additional allowance has been made where bedforms were identified on the geophysical survey (Section 8).

Terms used to define the trenching specifications are presented in Figure 10-1:

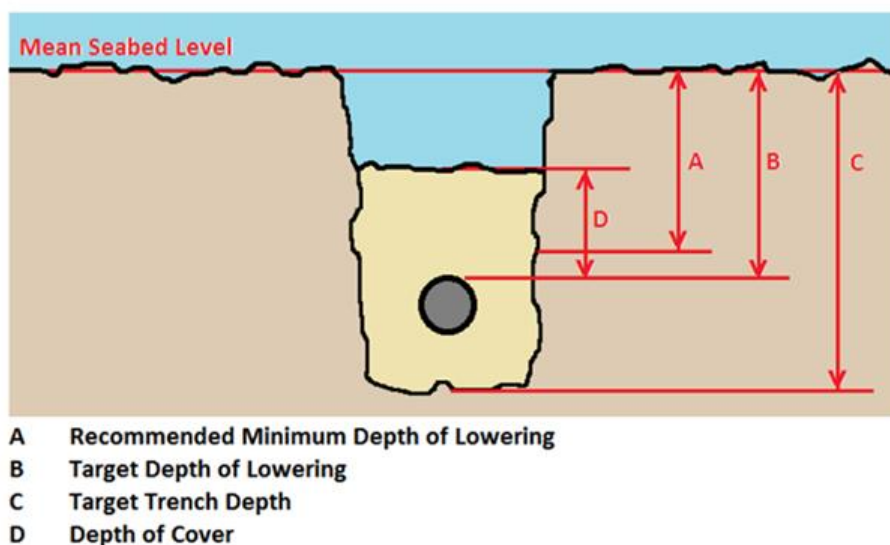


Figure 10-1: Trenching Specification Terminology.

A detailed sediment mobility assessment is presented in the CBRA. The assessment found the seabed changes recorded along the export cables suggest that lateral movement of larger scale bedforms (>0.5 m in height) does not appear to be occurring.

However, some locations are noted to have mobile sediment and the level of change indicated is generally limited to +/- 0.1 m with highly localised instances of change up to a maximum of +/- 0.4 m, generally associated with some change to the profile of the flanks of “sand accumulation features”.

Table 10-1 below demonstrates the current various burial requirements along the route based on Cathie Associates CBRA 2018:

Table 10-1: OEC Burial Target Depths

Zone	Location (KP)		Minimum Depth of Lowering (m)	Notes
	From	To		
HDD	0	1.1*	As per HDD	*The end KP (and start KP of Zone 1) shall be the as built position of the punch out.
Zone 1	1.1*	2.6	1.3	Seabed mobility of +/- 0.4m. Top of duct also to be lowered to 1.3m and cover to be re-instated.
Zone 2	2.6	47.0	1.6	With exception of SHET HVDC crossing. KP47 represents the split of the cables in toward the windfarm.
Zone 3	47.0	OSP	1.5	Seabed mobility of +/-0.4m.

The Modified TI ES (2014) assessments were based on a target depth lowering of 1 m. As the table above demonstrates, the minimum Depth of Lowering within each zone along the OEC route exceeds this target.

10.2 Cable burial techniques

The routes will be zoned by the cable trenching contractor to define which trenching tool (as described further below) will be utilised on which section according to specific sediment type.

The OEC route has soils that are suited to jet trenching and to chain cutting in order to ensure cable burial and sediment cover above the cable.

10.2.1 Post Lay Burial – Chain cutting (T3200)

The proposed trenching machine is a high performance heavy soil chain cutter capable of 2 m trench depth as shown in Figure 10-2 below. This machine is suitable for localised high strength clays. The trencher is launched from the vessel and lowered onto the cable. The cable is loaded into the trencher which then progresses along the cable route creating a trench into which the cable is lowered.

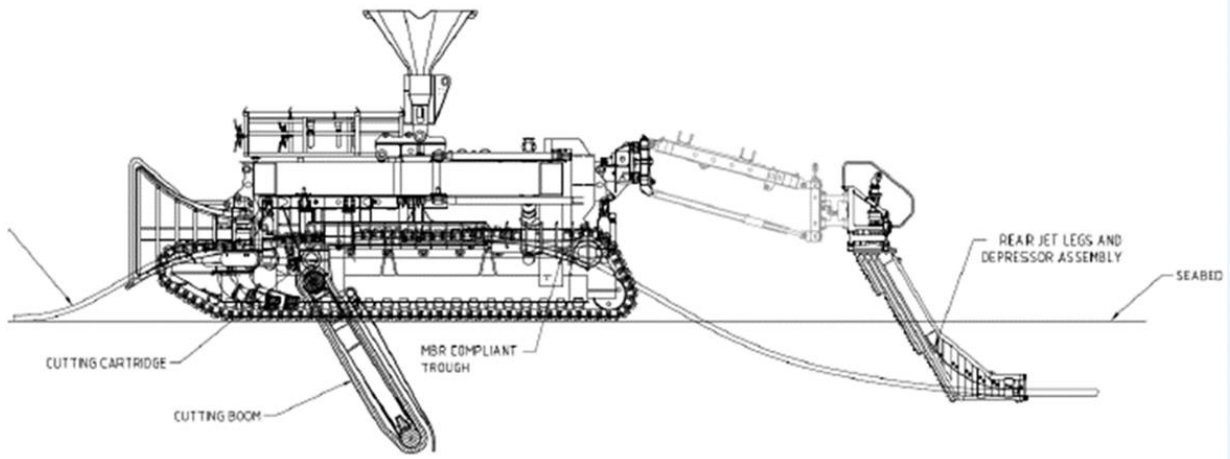


Figure 10-2: T3200 Trencher.

10.2.2 Post Lay Burial – Water jet trenching (T1000)

The water jet trencher is a high powered fluidising jet trencher capable of 3 m burial depth. The trencher is launched from the vessel and lowered onto the cable. Water jet trenching is suitable for sand and soft clays which are the most prominent soil type across the site.

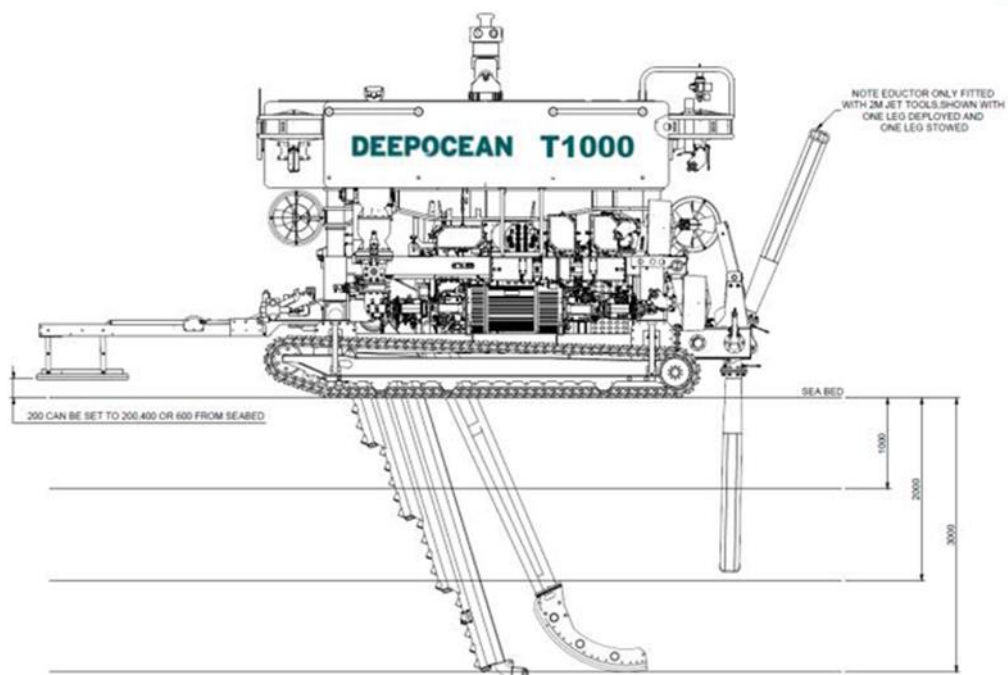


Figure 10-3: 30200 Trencher.

11 Requirements for design of the OEC third party cable crossing

Three crossings (one across each OEC) are to be engineered to sufficiently separate and protect the Moray East OECs from the single SHET HVDC cable as shown in Figure 11-1 below (the hatched grey represents the post lay berm as depicted in Figure 11-2, the grey area is the as-built cable protection installed on the SHET HVDC cable).

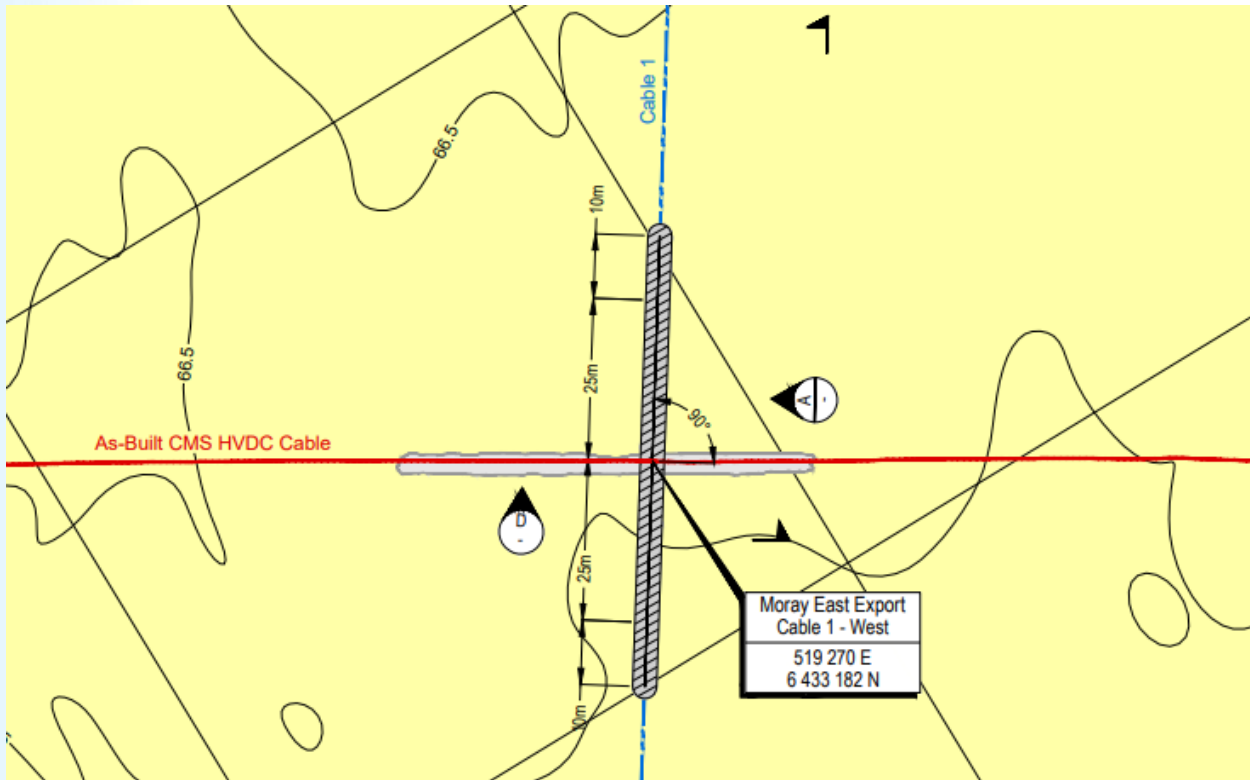


Figure 11-1: Indicative cable crossing arrangement of OEC 1 and SHET HVDC cable.

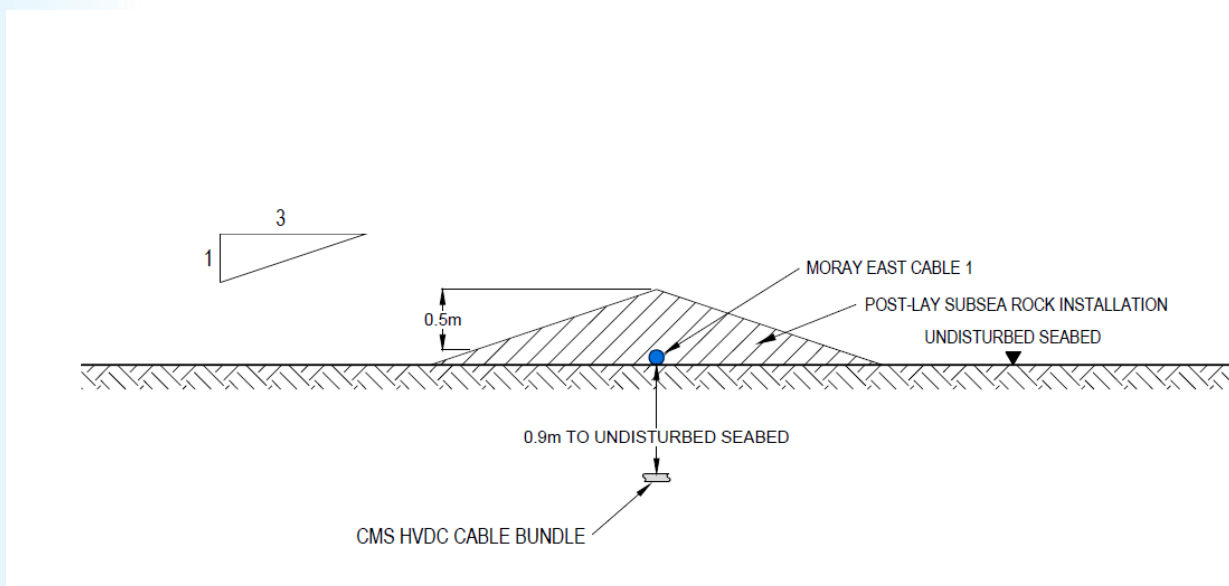


Figure 11-2: Indicative cable crossing arrangement (profile view) of OEC 1 and SHET HVDC cable.

11.1.1 Crossing Construction design

The Contractor will design a rock berm crossing using industry standard engineering solution consisting of specific rock type and quantities, (expected to be standard quarried granite / gneiss) and install a pre-lay rock berm, followed by post-lay rock berm upon completion of the cable lay.

The berms will be hydro-dynamically stable in the subsea environmental conditions and the design will consider the potential for overtrawling.

Pre-lay berms (on top of SHET cable and underneath Moray East cables) will be in the region of 10 m in length and post-lay berms (placed above installed Moray East cables) up to 100 m in total length. The berms will be approximately 10 m wide (with a 1:3 slope angle to seabed) and up to 0.6 – 0.5 m height. It is anticipated from these dimensions that the total rock amount quantity will be approximately 5,000 Metric Tonnes (Mte) for all three cables.

11.2 Requirements for OEC third party cable proximity

SHEFA owns and operates the circa 1,000 km SHEFA-2 fibre optic submarine cable running from Torshavn in the Faroe Islands to Maywick in Shetland, from Sandwick inland and onwards to Ayre of Caira in Orkney and from Manse Bay in Orkney to Banff in Scotland.

The SHEFA-2 Cable and the Moray East OECs reach landfall in proximity to each other in the vicinity of Inverboyndie Beach, west of Banff, Aberdeenshire and the SHEFA Cable runs adjacent to the consented corridor for the Moray East OECs.

An agreement has been negotiated relating to the construction and operation of the Moray East OECs and the SHEFA-2 fibre optic cable. This is accounted for in the route engineering of the project to maintain the maximum possible distance from this hard constraint.

11.3 Electromagnetic Fields

Table 11-1 below summarises the results of a desk based assessment carried out by Cable Consulting Limited (Cable Consulting Limited, 2018).

The study calculated the magnetic field magnitudes at a given distance. The magnetic fields generated from a 1,000 mm² AC 220kV Export Cable at a trench depth of 1 m is expected to reach a maximum value of 16.58 µT.

Note: magnetic field decreases rapidly with burial depth, vertical distance from the seabed and horizontal distance from the cable. For context, a reference magnitude of the earth's magnetic field can be estimated from models available in the public domain. Across the Moray East site and from sea level to maximum water depth the geomagnetic total field is estimated as 50.4±0.1µT. Hence the predicted magnetic field levels at seabed level associated with the buried cables if they are buried to 1.0 m is lower than the value associated with the earth's magnetic field.

Table 11-1: 1,000mm² cable maximum EMF strength (values in µT).

Measurement point height above seabed surface	Cable depth of lowering			
	-0.240m (i.e. surface laid)	0.5m	1.0m	2.0m
0m	1439 µT	54.31 µT	16.58 µT	4.618 µT
5m	0.8697 µT	0.6554 µT	0.5525 µT	0.4079 µT
10m	0.2115 µT	0.1829 µT	0.1668 µT	0.1403 µT

12 Cable Installation Methodology

The OfTI Marine Licence requires that the OfTI CaP includes the following:

“Details of the location and cable laying techniques for the cables.”

The Cable Installation Methodology is largely covered within the CMS and CoP (Moray East, 2020b); however, this section briefly outlines the key methodologies to be utilised for the OEC. Details of the cable locations are provided in Section 3 above.

For the OEC cables the following stages apply:

- HDD preparation
- OSP preparation
- Boulder clearance
- Pre-lay Grapnel Run (PLGR)
- Crossing preparation
- Pre-lay survey
- Cable landfall pull in
- Cable free lay
- Cable wet storage (contingency)
- Cable 2nd end pull in at OSP
- Cable trenching
- Crossings remedial installation
- Remedial protection (contingency)

12.1 Installation Methodology OEC

12.1.1 Installation Vessels OEC

Details of the proposed construction vessels used on the OEC are set out in the combined VMP and NSP (Moray East, 2018e).



Figure 12-1: Cable Lay Vessel Victoria.

12.1.2 Landfall preparation and HDD works

To bring the OECs into shore to connect to the onshore export cables, a total of three circa 1,100m long HDD ducts will be installed, one at a time at the landfall location at Boyndie Bay as detailed in the CoP & CMS document (Moray East. 2020b).

The proposed HDD works will be undertaken in such a way as to cause minimum disruption to members of the public. The working area will be contained by fencing and access to the works will be restricted for health and safety reasons. HDD drilling activities will be undertaken from shore and an offshore diving vessel will assist the punch out of the drill. Once the drilling is complete, a High Density Polyurethane (HDPE) duct will be pull in from the marine side, controlled in place by a tug and assisted by divers.

Once installation of HDD ducts is completed, and before the cable lay operations commence, each HDD end will be flanged and temporarily stabilised (with concrete mattress or similar) and buried until cable lay operations commence.

12.1.3 OSP preparation

The cable installation contractor will prepare the OSPs ready to pull in the cables direct from the cable lay vessel in such a manner as to not delay the vessel upon its arrival. Messenger lines will have been passed through the J-tubes, winches fitted and tested and all pull in equipment loaded and set up both in the fabrication yard and offshore.

12.1.4 Boulder displacement/relocation

Along the Moray East OEC route multiple sections are found with a high density of boulders. Boulders can be a hazard for lay, trenching and longevity of the cable system. If cable route engineering is unable to ensure the route is boulder free, a vessel will be mobilised to relocate any boulders along the route which affect the installation. The actual boulder clearing will nominally be carried out by the boulder grab system which is a hydraulic subsea tool launched via the vessel crane and capable of manoeuvring subsea in conjunction with surveillance equipment to pick up and move objects up to 7 tonnes in weight from the seabed.



Figure 12-2: Boulder Grab System.

Subject to significant aggregations of boulders where the above system (boulder clearance) would be inefficient, a scar plough may be considered locally to create a path through the boulder field for the cable to be laid. The plough may be deployed from a similar vessel as the PLGR works and towed across the seabed displacing boulders either side to create a hazard free swath to lay the cable into.

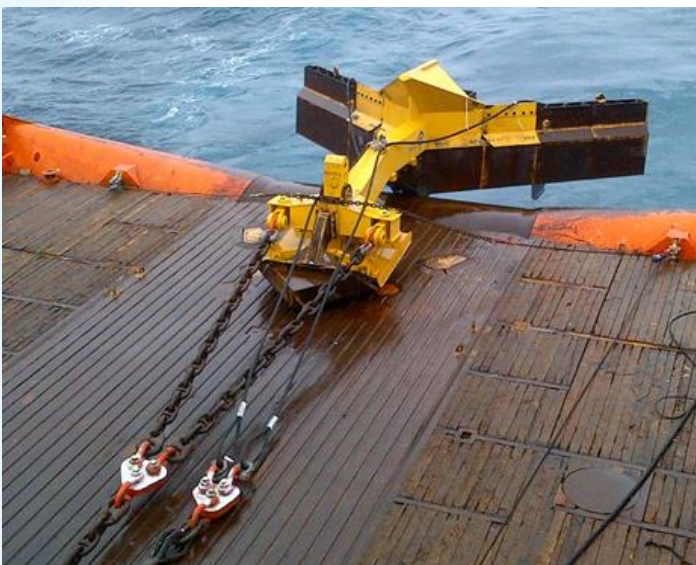


Figure 12-3: Scar Plough.

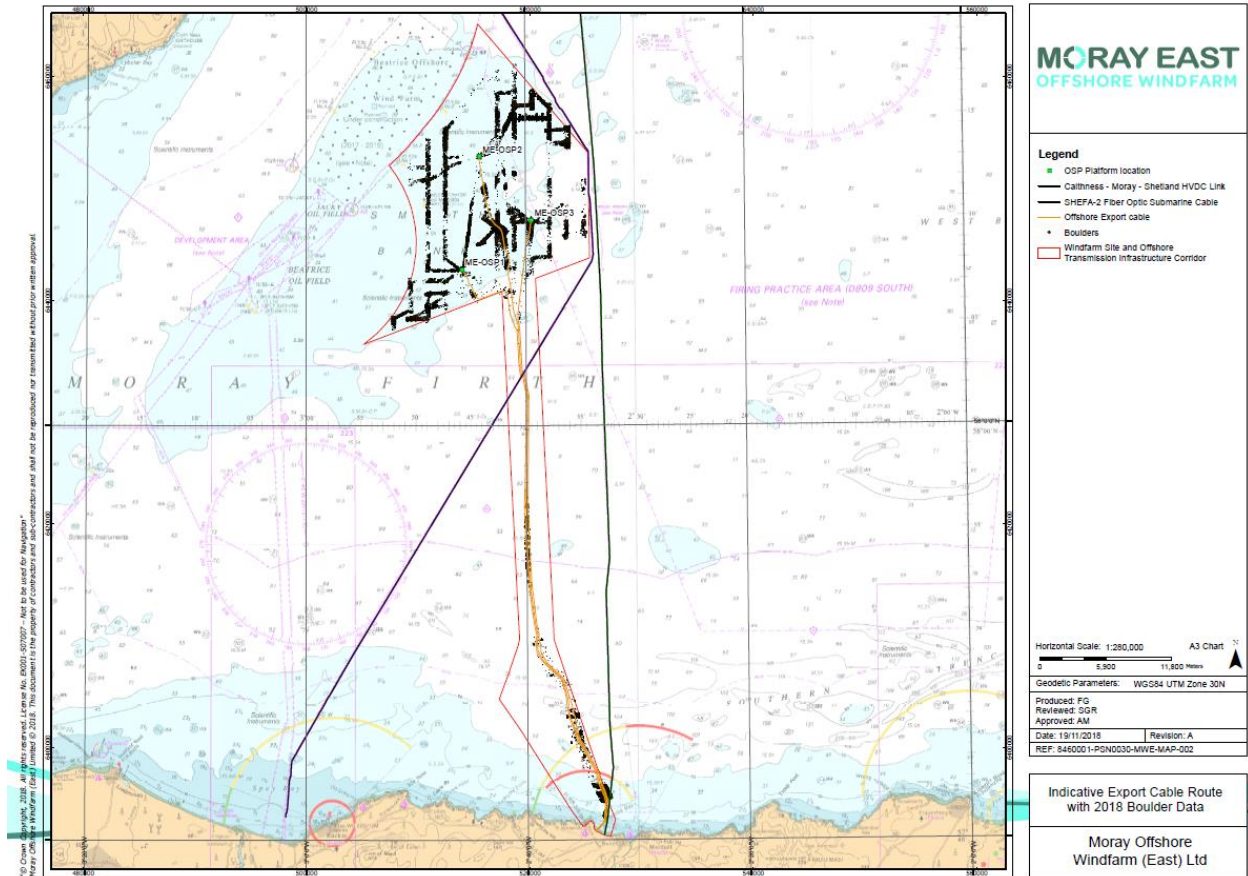


Figure 12-4: 2018 Boulder data recorded.

12.1.5 PLGR

Prior to cable lay operations offshore, in order to reduce the risk of cable being laid on debris, a Pre-Lay Grapple Run (PLGR) will be performed by a standard offshore anchor handling vessel (commonly a multicat type). The PLGR operations should be planned to finish prior to cable laying operations starts.



Figure 12-5: PLGR train.

12.1.6 Crossing preparation

Before laying the OEC over the SHET HVDC cable crossing some enabling works shall be required at the cable crossing location in advance of the commencement of cable lay activities. This includes but is not limited to the following activities:

- i. Seabed inspection of crossing location including positive identification of SHET HVDC cable and measurement of the XYZ position and depth of cover of the cable.
- ii. If the cable is found to be in an unburied condition; placement of material on top of the existing cable to provide the required vertical separation between the existing cable and the Moray East cable(s). It is anticipated the Pre-lay filter layer will consist of 600 mm deep bed of rock covering an area of (3x) 10 m x 10 m, and the total quantity is estimated as 534 MT of filter rock with a specific gravity of 2.6 tonne per cubic metre.
- iii. Placement of any seabed positioning devices that are required as part of the contractor's installation methodology or Moray East's cable crossing agreement.

12.1.7 Pre-lay survey

Pre-lay inspection survey of the OEC route and the cable crossing will be undertaken to ensure cable lay area is free from any debris or hazard that can damage the cables.

12.1.8 Cable landfall pull in

Before cable pull in from the landfall starts, some preparation works will be done at shore including installation of winches and hang offs to hold cables etc. Once the landfall has been prepared, the cable will be pulled in through the HDD ducts from the landfall, to achieve the pull-in of the cable from the cable lay vessel through the landfall ducts to its planned location within the transition joint bay.

12.1.9 Cable free lay

The installation vessel will then lay the cable to the seabed along the preset route, monitored by the Work Class Remotely Operated Vehicle (ROV) tethered from the vessel. This will be especially important to ensure the cable is accurately laid across the pre-installed rock berm at the crossings and through boulder fields.

12.1.10 Cable wet storage (contingency)

Depending on delivery timelines of the OSPs, it may be necessary to temporarily lay the cable to seabed in the vicinity of the OSP (nominally 500 - 1,000 m back along the route to shore). This is known as wet storage, whereby the cable is laid down, sealed against water ingress, and fitted with recovery rigging to aid retrieval once the OSPs are in place. At which time, the vessel will return to pick up the cable and recommence the installation to the OSP in the same manner as below.

12.1.11 Cable 2nd end pull in at OSP

The preferred method for installation of the final end of the OEC is through the use of a quadrant from the deck of the cable lay vessel, whereby a "bight" of cable will be supported from deck to seabed during the pull in. The OEC end will be pulled into the OSP using a platform-mounted winch, and cable protection will be attached to the export cable on board the cable laying vessel prior to the pulling operation. Alternatively, the cable may be laid on the seabed within the CPS and close to the J-tube exit, then pulled up into the J-tube across the seabed a short distance in line with the route.

12.1.12 Cable trenching

Following cable lay, tracked ROVs will be deployed from DP2 vessels to trench the Moray East OECs. They will be configured in cutting or jetting mode. Where cutting is performed by chain cutters, the cutting

chain is fitted with an array of cutting picks, positioned to efficiently and effectively cut the full width of the cutting boom. A slot trench defined by the cutter will provide protection in areas of hard clays. Where the soils are less difficult (sands or soft clays), the trenching mode will be water injection jetting from the same trenching vehicles. The maximum affected trench width for each OEC circuit during construction will be 8 m using the largest trencher (see Section 15 below).



Figure 12-6: Cable Trenching Vessel.

12.1.13 Crossings remedial installation

The rock installation vessel will be required to place three berms of rock across the cable at the crossing points. A full “out” survey will then be performed by the same vessel to accurately identify the “as left” shape of the berms and confirm they are within the design tolerance.

The structures are anticipated to consist of a rock berm of 500 mm height covering an area of (3x) 200 m x 10 m, it is estimated that this shall be 4,293 MT, of filter rock.

12.1.14 Remedial protection (contingency)

With the burial equipment proposed, it is expected that successful burial will be achieved along the entirety of the route. However, should minimum Depth of Lowering (DoL) not be achieved due to, for example, unforeseen obstacles along the route then appropriate means of additional protection will be employed. Likely protection measures would be utilising the same rock berm vessel and design as above to afford sufficient protection for the lifetime of the cable.

12.1.15 Post Installation Survey

The final position of the cable will be determined by means of a post installation survey. This will be carried out followed by free-flying ROV moving along the cable route and recording the horizontal and vertical position of the cable relative to the seabed from the main lay vessel.

13 Export Cable Operation and Maintenance

The OfTI Marine Licence requires that the OfTI CaP includes the following:

“Methodologies for over trawl surveys of the cables through the operational life of the works where mechanical protection of cables laid on the seabed is deployed.

Measures to address exposure of any cables.”

The following section provides information relating to post-installation surveys and potential remedial actions to be taken should cable exposure occur.

13.1 Post Installation Surveys

Prior to completion of installation, a full set of as built documentation will have been obtained as the baseline for the as left condition of the OEC. Post-construction surveys will be undertaken immediately following installation, in order to verify the as built conditions.

These as built will consist of survey data for all aspects of the lay and burial and include updated charts, acceptance tests etc. In addition, ROV footage of the seabed will be collected during the installation of the cables.

The design and frequency of further post-construction surveys will be determined from the evaluation of asset integrity risks presented by the site conditions, asset design and results from through-life surveys.

The OEC will be subject to periodic inspection. In the Operation Phase, further cable and / or seabed surveys will be undertaken to confirm that cables remain buried to the required depths or the existing seabed remains unchanged. The method of survey will be similar to other construction surveys, though likely restricted to bathymetric survey from small vessel or free flying ROV.

For areas where minimum DoL is not achieved, where high fishing activity occurs and where substantial lengths of OEC require mechanical protection, Moray East will be required to undertake targeted overtrawl surveys. Moray East have designed an Overtrawl Methodology in conjunction with the local fishing industry and agreed with Marine Scotland Licensing Operations Team (MS-LOT). This document outlines the methodology which guides the selection process for overtrawl locations and provides a high-level summary of the techniques which should be employed during the survey. The agreed methodology can be found in Appendix 3 of this document.

13.2 Further potential Remedial Actions

In the event of cable failure or exposure, cable sections will be replaced and / or reburied, or cable protection will be applied.

Additional equipment not previously selected for cable installation may be required, which may include a Mass Flow Excavator (MFE) (subsea water jetting excavation device), hydraulic subsea cable cutter, and similar vessels to the nominated installation vessels already on the project.

Cables may already be buried and as such will require partial retrieval, commonly via a method using the MFE of opening “box cuts”, these are small excavations using the MFE to expose approximately 5 m by 5 m space around the cable so that an ROV may access the cable and use the hydraulic cable cutter.

Alternatively, cables may be grappled for, which requires an operation similar to the PLGR operation (Section 12.1.5 above) to positively attach onto a damaged cable at a known location to retrieve to the vessel.

In both above cases the cable ends are then recovered on board the vessel using the ROV and recovery rigging, and/or the cable ends will be relaxed out of their hang-offs on the OSPs if required, before being cut and prepared to be jointed.

The installation of cable repair joints along the route would be performed by a cable installation vessel or specialist repair vessel. Two joint boxes would be utilised either end of a new replacement section, before the whole jointed system being laid back to the seabed and buried.

The new route will remain at all times within the consented area and the area that has been cleared of potential UXO, avoiding any other identified impact.

It is likely that the cable will be buried in parallel with the original burial route rather than in the exact same trench, but this would not be expected to be more than 10 m from the original location.

In the case of a cable replacement at the OSP, it is likely that a new CPS would also be used of the same or similar design as the original.

14 Compliance with the Application

14.1 Introduction

As presented in Table 1-1 above, Condition 3.2.2.10 of the OfTI Marine Licence states:

“The CaP must be in accordance with the application.”

Section 14.2 below sets out information from the Modified TI ES 2014 with regard to compliance with the cable installation and burial proposals assessed.

14.2 Compliance with the Modified TI ES 2014

The Modified TI ES 2014 described a range of specification and layout options that could be applied during the construction of the Development. This took the form of a broad “Rochdale Envelope” incorporating a variety of options. The ES defined likely cable installation specifications for the Development, based upon these broad options.

Since the Moray East Offshore Wind Farm Consents were granted, the cable installation details have been substantially refined as detailed in this document. In order to demonstrate continued compliance of this refined design, Appendix 1 provides a tabulated comparison of cable specifications as presented in the ES and this OfTI CaP.

15 Updated Cable Trenching Methodology

Since publication of the Modified TI ES in 2014 a significant amount of cable design engineering has been carried out as detailed within this OfTI CaP. A number of tools have been identified by relevant contractors are likely to be used during the installation of the OEC. The following provides a comparison of the Modified TI ES 2014 assessment of the OEC and the worst case scenario (WCS) assessment resulting from the proposed OEC installation tools for the Moray East Transmission Infrastructure. This comparison has been undertaken by Royal HaskoningDHV. The changes in OSP interconnector trench length are considered in this document as the original assessment of the OSP interconnector cables was carried out jointly with the export cables assessment as part of the Moray East Modified TI ES 2014. However, the same cable trencher will be used for the interarray cables and the OSP interconnector and the trenching methodology for the OSP interconnector is therefore considered in the Wind Farm Cable Plan and not in this document.

The dimensions of the proposed cable trenchers for the OEC and area of seabed disturbed during the cable installation are shown in Table 15-1 below in comparison to the consented parameters.

Table 15-1: Parameters relevant to the cable trenching methodology

Relevant Parameters	Consented Parameters	Proposed Trencher Parameters
Trench depth	1m target (WCS 3m, as assessed in Modified TI ES 2014, Chapter 3.1)	2.05m
Trench affected width	6m	8m
Trench width	WCS 3m, as assessed in Modified TI ES 2014, Chapter 3.1	1m
Vehicle tracks	Not considered in ES as information was not available	2m for each track (4m combined width)
Cable length	Approximately 278km (70 km of OSP interconnector and export cable within Moray East site plus 208 km – 4 cables x 52 km within OfTI Corridor) Overall Development (inter-array, OSP interconnector & export cables) = 850 km	Approximately 196km (43 km OSP interconnector and export cable within Moray East site plus 154 km within OfTI Corridor) Overall Development (inter-array, OSP interconnector & export cables) = 352 km
Profile	‘V’ shape	‘U’ shape

The dimensions of the OEC trenches have reduced in comparison to the WCS assessed in the Modified TI ES 2014. However, the proposed trencher to be used for the OEC will have greater contact with the seabed either side of the trench through the trench affected width and due to vehicle tracks on either side of the trench affected width. Therefore, there is up to 12 m (up to 8 m trench affected width and up to 4 m trencher tracks) of potential seabed disturbance for the OEC.

Due to the change in parameters of the proposed trenchers for the OEC and OSP interconnector cables there is a requirement to assess the potential seabed disturbance caused by the proposed trenchers.

In order to assess the impacts of seabed disturbance from the proposed trencher the quantity of SSC expected to arise has been calculated (Section 15.1 below) and disturbance from contact with the seabed has been assessed (Section 15.2 below).

The outputs have been used to assess the impacts to the relevant environmental receptors, specifically:

- Benthic ecology;
- Intertidal ecology;

- Fish and shellfish ecology; and
- Archaeology.

The results of the impact assessment are provided in Sections 15.3 to Section 15.6 below.

15.1 Suspended Sediment Concentrations

A worst-case scenario for sediment release was calculated within the Modified TI ES 2014, expressed as per metre of trench sediment. The assessment was completed by ABPmer (Modified TI ES 2014 ES, Chapter 3.1) using the methodology / assumptions set out below.

- The total mass of sediment (9,540 kg) is re-suspended evenly up to a (variable) ejection height;
- The time required for sediment to settle (at 0.05 m/s or 0.0001 m/s) through the total height of ejection is calculated to yield the duration of the effect;
- The length scale of the effect is the furthest distance travelled by the plume (in a downstream direction) and is the product of the ambient current speed (0.25 m/s) and the duration of the effect;
- The estimate of mean suspended sediment concentration is estimated by dividing the total dry mass of sediment by the volume of the triangular wedge of water through which the sediment will settle (ejection height multiplied by downstream distance divided by two); and
- The average thickness of any resulting sea bed deposit is estimated by dividing the total volume of sediment (4.5 m³) by the footprint (length scale of the effect multiplied by 1 m).

The outcome of the calculations for the consented trencher is set out in Section 15.1.1 and the calculations for the proposed trenchers for the OECs are provided in Section 15.1.2 below.

15.1.1 Consented Cable Trencher

The worst-case scenario for sediment release, expressed as per metre of trench length for the consented trencher for the OEC (including OSP interconnector) in the Modified TI 2014 ES is:

- The maximum trench dimension is 3m wide x 3m deep with a 'V' shaped profile = 4.5 m³/m sediment disturbance, all of which is released into the water column;
- The porosity of the material is conservatively estimated as 20 % void = 3.6 m³/m sediment material release
- The sediment is assumed to be quartz with a density of 2,650 kg/m³ = 9,540 kg/m dry mass sediment release;
- All the sediment is released as a fully fluidised mixture. The cable route consists of mixed sands and gravels, with a low fines content, becoming progressively finer in deeper water along the route; and
- A wider area of sea bed (trench affected width, up to 6 m centred on the trench route) might be affected by some contact with the trencher but is not considered to contribute to the displacement of sediments.

The range of possible effects on SSC and deposition for a cable trench of this dimension are provided in Table 15-2 below, which quantifies the total effect per metre of trench length dug (from the Modified TI ES 2014 Chapter 3.1). The assessment shows that a lower height of ejection will result in a greater SSC and thickness of deposition, but with a smaller footprint of effect, and *vice versa*.

Table 15-2: Extent and magnitude of effect of cable trenching in medium sands (top) and fine sediments (bottom) for the original trenching method assessed in the EIA (Moray East, 2014)

Ejection Height (m)	Duration of Effect (s)	Length of Scale of Effect (m)	Indicative Mean SSC (mg/l)	Average Thickness of Deposit (m)
Medium Sands – Settling Velocity 0.05m/s				
1	20	5	3,816,000	0.9
5	100	25	152,640	0.18
10	200	50	38,160	0.09
25	500	125	6,106	0.036
Fine Sediments - Settling Velocity 0.0001m/s				
1	10,000	2,500	7,632	0.0018
5	50,000	12,500	305	0.00036
10	100,000	25,000	76	0.00018
25	250,000	62,500	12	0.000072

According to ABPmer (Modified TI ES 2014, Chapter 3.1), a critical thickness of sediment deposition for medium sands with relevance to benthic ecology is 0.05 m. The maximum possible distance from the trench over which displaced sediment of any type might deposit to a thickness of 0.05 m is 106 m (affecting an area of 106 m² per metre of trench installed).

For fine sediments, the effect of cable trenching on SSC would initially have a magnitude potentially more than the natural range of variability. However, the effect will be localised and temporary. Deposition would be followed by re-suspension, and sediments would disperse further throughout the water column with the result that SSC and the thickness of any subsequent deposits would be very small and within the range of natural variability.

15.1.2 Proposed Trenchers

To assess the significance of the volume of disturbance from the proposed trenchers, the method adopted by ABPmer (Modified TI ES 2014, Chapter 3.1) has been replicated. The worst-case scenario for sediment release (using the dimensions of the proposed trencher for the OEC) are provided in Table 15-3 below:

Table 15-3: Parameters of the export cable and OSP interconnector cable used to determine SSC and deposition

WCS Parameter	Export cable trench	OSP interconnector trench
Maximum trench dimensions	1m wide x 2.05m depth with a 'U' shaped profile = 2.05 m ³ /m	1m wide x 1.5m depth with a 'U' shaped profile = 1.5 m ³ /m
Porosity of the material (20% void)	1.64m ³ /m sediment material release	1.2m ³ /m sediment material release
Sediment density (2,650kg/m ³)	4346kg/m dry mass	3180kg/m dry mass

The range of possible effects on SSC and deposition for the proposed trench for the OEC are shown in Table 15-3 and Table 15-4 respectively.

Table 15-4: Extent and magnitude of effect of cable trenching in medium sands (top) and fine sediments (bottom) for the proposed trencher (OEC).

Ejection Height (m)	Duration of Effect (s)	Length of Scale of Effect (m)	Indicative Mean SSC (mg/l)	Average Thickness of Deposit (m)
Medium Sands – Settling Velocity 0.05m/s				
1	20	5	1,738,400	0.4100
5	100	25	69,536	0.0820
10	200	50	17,384	0.0410
25	500	125	2,781	0.0164
Fine Sediments - Settling Velocity 0.0001m/s				
1	10,000	2,500	3,477	0.0008200
5	50,000	12,500	139	0.0001640
10	100,000	25,000	35	0.0000820
25	250,000	62,500	6	0.0000328

Table 15-5: Extent and magnitude of effect of cable trenching in medium sands (top) and fine sediments (bottom) for the proposed trencher (OSP interconnector cable).

Ejection Height (m)	Duration of Effect (s)	Length of Scale of Effect (m)	Indicative Mean SSC (mg/l)	Average Thickness of Deposit (m)
Medium Sands – Settling Velocity 0.05m/s				
1	20	5	12,72000	0.3000
5	100	25	5,0880	0.0600
10	200	50	12,720	0.0300
25	500	125	2,035	0.0120
Fine Sediments - Settling Velocity 0.0001m/s				
1	10,000	2,500	2,544	0.0006000
5	50,000	12,500	102	0.0001200
10	100,000	25,000	25	0.0000600
25	250,000	62,500	4	0.0000240

In the method adopted by ABPmer (Modified TI ES 2014, Chapter 3.1), the ejection height, duration of effect and length of scale of effect are kept constant regardless of volume of sediment released. Given these parameters are constant, but the volume of sediment released decreases, the estimated indicative mean SSC for both proposed trenchers compared to the original trenching method assessed in the Modified TI ES 2014 are estimated to be more than 50 % smaller.

The average thickness of the deposit also decreases by 50 % to mirror the decrease in SSC, meaning the absolute estimates of thickness are very small. For both proposed trenchers, the maximum thickness is estimated to be below 1 mm compared to 2 mm for the original trenching method.

The maximum possible distance from the trench over which displaced sediment of any type might deposit to a thickness of 0.05 m is 45 m for the OEC and 33 m for the OSP interconnector cable compared to 105 m for the original method.

15.1.3 Summary of Disturbance for Proposed Trenchers

The following conclusions can be drawn from the comparative analysis on the two trenching methods:

- SSC is estimated to decrease by more than 50 % for the proposed trenching methods compared to the original trenching method;
 - This does not affect the outcome of the original assessment because, for both the original and proposed trencher methods, they would eventually reduce to be within the range of natural variability, through continued deposition and re-suspension (although quicker for the proposed trencher).
- The average thickness of the deposit is also estimated to decreased by over 50 % for the proposed trenching methods compared to the original trenching method;
 - This does not affect the outcome of the original assessment because the absolute estimates of thickness are smaller for the proposed trenchers, decreasing from a maximum of only 2 mm for the original method to a maximum of less than 1 mm for the proposed trenchers.

In both methods, there will be contact of the trencher with the seabed. In the Modified TI ES 2014, it was stated that a wider area of seabed (up to 6 m centred on the trench route, referred to as 'trench affected width') might be affected by some contact with the burial machine, but was not considered to contribute to the disturbance and release of sediments. The WCS for the trench affected width for the OEC and OSP interconnector cables is now 8 m, as shown in Table 15-1 above. Additionally, for both the OEC and the OSP interconnector cables, the proposed trenchers also have contact on either side of the trench due to trencher tracks, which are 2m either side of the trench affected width. This additional seabed contact was not included in the Modified TI ES 2014 and has been considered in Section 15.1.4 below.

15.1.4 Trencher Tracks / Seabed Contact

The effect of vehicle tracks on the seabed (2 m wide on either side of the trench affected width), created by the cable installation equipment, was not considered as part of the Modified TI ES 2014 assessment due to lack of information on the trencher at the time of writing. Additionally, there is potential for a small increase in trench affected width for the OECs and OSP interconnector cables (an additional 2 m) due to the proposed trencher to be used for the OECs and OSP interconnector cables. An assessment is therefore required to determine whether this change in the project description is significant compared to the consented project description (i.e. no trencher tracks).

There is potential for the tracks of proposed trenchers used during the installation of the OECs and OSP interconnector cables to directly impact the seabed. Where the trencher moves over the seabed, there is potential for the seabed to be compressed vertically downwards and displaced laterally. An indentation will be created, the same size as the dimensions of the trencher tracks (i.e. two times 2 m = 4 m wide). It is estimated that an indentation would be created that is a maximum of 0.2 m deep compared to the surrounding seabed. On either side of the tracks there is the potential for the seabed to be slightly raised in a series of linear pressure ridges. After the trencher has passed, some of the slightly raised sediment would return to the track indentation via slumping under gravity until a stable slope angle is achieved. Over the longer term (months), the track indentation would become shallower, less distinct and return to its original profile, due to infilling with mobile seabed sediments.

In addition, the creation of the track indentations will release a negligible volume of sediment into the water column compared to the creation of the trench itself. Hence, the effects of the proposed trenchers on SSC and sediment deposition would be the same as those for the original consented assessment.

Given the small magnitude of the track indentation, its short-term nature (i.e. the seabed will recover over months), and the negligible changes in SSC and sediment deposition due to the tracks, the original consented assessment remains valid for the proposed trenchers.

In addition, the consented length of the OECs and OSP interconnector cables combined is 278 km, whereas the cable length to be installed is only 197 km, as set out in Table 15.1 above. The length of cable to be installed is significantly less than the consented length. Hence, any increase in sediment disturbance caused by the use of the proposed trencher tracks, as highlighted above, is minimal and would be expected to recover within months. Additionally, as determined in Section 15.1 above, the amount of SSC expected to arise has reduced by 50 %. Therefore, any increase in seabed disturbance caused by use of the proposed trencher tracks would be compensated by the reduction in the overall cable length the trencher would be operated over and by the reduction in SSC from the proposed trenchers compared to the consented trencher.

Although there is a very small increase in trench affected width for the OECs where the trencher may come into contact with the seabed (an additional 2 m), as described above, the consented cable length is much larger than the cable length to be installed therefore this very small increase in trench affected width is expected to be compensated by the reduction in the overall cable length. In accordance with the original assessment, this contact is not considered to contribute to the displacement of sediments and has therefore not been considered further.

An assessment of the seabed disturbance from the updated trenching methodology on the relevant environmental receptors is provided in Sections 15.3 to 15.5 below.

15.2 Benthic Ecology

As highlighted in Section 15.1, the proposed trenches have a smaller depth than the WCS assessed in the Modified TI ES 2014, meaning less sediment will be removed per metre of trench in comparison to the consented trencher. However, the proposed trenchers have vehicle tracks on either side of the trench affected width, meaning there is up to 10 m of potential seabed disturbance for the OSP interconnector and up to 12 m of potential seabed disturbance for the OEC.

The impact of the proposed trenchers has been assessed in relation to benthic ecology. The only impacts of relevance to the new trenching method is temporary habitat loss, increased SSC and seabed disturbance.

With regards to temporary habitat loss, the overall length of the trench has reduced from the consented 278km to 197km, meaning the total footprint of temporary habitat loss due to trenching has reduced. Therefore, temporary habitat loss during the construction phase due to the trench footprint has not been considered further.

With regards to SSC, the Modified TI ES 2014 showed that installation activities will increase SSC by one or two orders of magnitude above the range of that which occurs naturally but only over a very small distance from the point of disturbance (i.e. to 125 m) and for a very short duration (i.e. minutes) (Modified TI ES, 2014 Chapter 3.1).

The effect of SSC was determined in the Modified TI ES 2014 to be highly localised and of short duration, resulting in a low magnitude of effect. Biotope and species receptors were determined to be of low sensitivity due to being widely distributed throughout the region and tolerant to the predicted sediment effects. Therefore, the impact significance was predicted to be **minor**.

With regards to seabed disturbance, the proposed trenchers have a slight increase in temporary disturbance from the trencher tracks (as discussed in Section 15.1.4 above); however, the reduction in SSC from the trenchers and the reduction in length of cable corridor means overall the magnitude of the effect is still considered to be low. Additionally, biotope and species receptors will be the same, meaning

receptor sensitivity is still considered to be low. Therefore, overall the impact significance of the proposed trenchers is predicted to be **minor**.

15.3 Intertidal Ecology

The Modified TI ES 2014 assessed the impact of cable installation within the intertidal area. Installation activities are likely to be undertaken during low tide periods therefore the potential for re-suspension of material due to construction activities and subsequent settlement is limited. The degree of sediment re-suspension likely to occur with the flooding tide is expected to be low due to the relatively coarse nature of the sediment (sand), which will settle back to the sea floor very rapidly and close to the site of initial disturbance. The spatial extent of any sediment settlement is therefore expected to be very localised and will occur over the short-term so that the overall magnitude of the effect will be very low (Moray East, 2014).

The sensitivity of the intertidal biotopes to the effect of temporary sediment disturbances and re-settlement is also considered very low as a result of the naturally perturbed environment at Inverboyndie and associated effects of sediment suspension, scour and deposition.

The overall effect of increased SSC on intertidal ecology was assessed to be **not significant** with low uncertainty within the Modified TI ES 2014. The installation method at the landfall is HDD from above Mean High Water Springs out to approximately 1 km seaward and as such **no impacts** are predicted within the intertidal area and are therefore no worse than those assessed within the Modified TI ES 2014.

15.4 Fish and Shellfish Ecology

Impacts to fish and shellfish vary depending on the type of species resulting in the sensitivity of the receptor ranging from medium to low. Increased SSC and sediment re-deposition due to installation of the export cable (including OSP interconnector cables) was assessed in the Modified TI ES 2014, in relation to fish and shellfish ecology. The impacts of relevance to the new trenching methods are therefore increased SSC and seabed re-deposition and disturbance.

With regards to SSC, the Modified TI ES 2014 assessment shows that increased SSC may result in localised avoidance of the area by mobile and migratory fish, leading to limited disturbance. Additionally, sediment re-deposition has the potential to smother fish and shellfish species which lay their eggs on the seabed. However, the impact magnitude of increased SSC and sediment re-deposition was determined to be small due to the localised and short-term nature of the impact. Due to the sensitivity of the fish and shellfish receptors being medium to low and the impact magnitude being small the impact was assessed to be negative of **minor** significance for all fish and shellfish species.

With regards to seabed disturbance, given the small level of disturbance predicted from the increased trencher tracks as described above and the decrease in amounts of SSC due to the proposed trenchers in comparison to the consented trencher, the impact of increased SSC and sediment re-deposition as a result of the proposed trenchers is still considered to be of negative **minor** significance.

15.5 Archaeology

Within the Modified TI ES 2014, **no significant** indirect effects were identified from changes to seabed processes which may induce adverse effects upon Cultural Heritage receptors. In fact, minor positive effects from increases in SSC may benefit Cultural Heritage receptors by increasing protective sediment cover. The small increase in seabed disturbance from the proposed trencher tracks has not changed the outcome of the assessment in the Modified TI ES 2014. **No significant** indirect effects have been identified and there is still potential for protective sediment cover due to SSC.

15.6 Summary

Following an update to the quantities of SSC and deposition reported in the Modified TI ES 2014, to take into account the dimensions of the proposed trenchers for the OEC, an impact assessment was carried out on all receptors with the potential to be affected by SSC and sediment deposition and disturbance from trencher tracks. A summary of the outcome of the impact assessment of the proposed trenchers in comparison to the consented trencher is presented in Table 15-6 below.

Overall, due to the small disturbance as a result of the proposed trencher tracks, the reduction in SSC now expected and the reduction in the cable corridor length (when compared to the consented cable trencher parameters; Modified TI ES 2014), no changes to the assessed impacts are predicted.

Table 15-6: Summary of impacts of the proposed trencher

Receptor	Impact	Impact Significance		
		Consented Trencher	Proposed export trencher	Proposed OSP interconnector trencher
Benthic Ecology	Indirect disturbance (increased SSC and sediment deposition)	Minor	Minor	Minor
Intertidal Ecology	Indirect disturbance (increased SSC and sediment deposition)	Not significant	Not significant	Not significant
Fish and Shellfish Ecology	Temporary disturbance of the seabed (increased SSC and sediment re-deposition)	Minor	Minor	Minor
Archaeology	Increased SSC and sediment re-deposition	Minor positive	Minor positive	Minor positive

16 References

Moray East (2019) Wind Farm Cable Plan, Moray East Offshore Windfarm. Document submitted to MS-LOT for approval in March 2019.

Moray East (2020a) Development Specification and Layout Plan, Moray Offshore Wind Farm and Associated Offshore Transmission Infrastructure. Document submitted to MS-LOT for approval in September 2020.

Burial assessment and trenching Risk Assessment Export Cable Corridor (Senergy, 2015) 2303-MOR-TEC-06-02 (Rev 2 – 29-1-15)

C950RO2-03 Moray East Offshore Windfarm Export Cable CBRA 08-10-2018 Rev 03

Carbon Trust, 2015. Cable Burial Risk Assessment Methodology: Guidance for the Preparation of Cable Burial Depth of Lowering Specification. The Carbon Trust, 2015.

Moray East (2018) Project Environmental Monitoring Programme. Document submitted to MS-LOT for approval in September 2018.

Moray East (2020b) Construction Programme & Construction Method Statement Document. Document submitted to MS-LOT for approval in November 2020.

Moray East (2020c) Vessel Management Plan and Navigational Safety Plan, Moray Offshore Wind Farm and Associated Transmission Infrastructure. Document submitted to MS-LOT for approval in October 2018.

Appendix 1 Compliance with cable installation parameters assessed and commitments in the Modified TI ES 2014

Source	Cable element	Modified TI ES parameter/commitment	Final design parameter/relevant section of OfTI CaP
Moray East Modified TI ES 2014	General cable specifications	Cable configuration: 4 cables each in triplecore (offshore) arrangement	3 cables each in triplecore (offshore) arrangement (as detailed in the DSLP)
		Cable bundle separation distance: 4 x water depth	Up to 1,200 m (Section 9.3)
		Voltage of cabling: 220 kV (AC)	220 kV (AC) (as detailed in the DSLP)
		Entry / exit method from OSPs: J-tube	J-tube (as detailed in the DSLP)
		Target burial depth in seabed: 1 m	Depth of lowering varies from 1.3 to 1.6 m (Section 10.1.3)
		Protection where target burial not achieved: Concrete mattresses or rock placement	12.1.14: Where the minimum Depth of Lowering (DoL) cannot be achieved, then appropriate means of additional protection will be employed. Likely protection measure will be rock placement
		Trench affected width: 6 m per cable	8 m (Section 15)
		Cable corridor length (from Moray East wind farm area): approximately 52 km	Cable length is 52 km from Moray East wind farm area ((as detailed in Section 4.6.1.1 of the DSLP)
		Cable corridor width: up to 1,200 m	Up to 1,200 m (Section 9.3)
	Cable installation	The available techniques for creating the cable trenches are ploughing, jetting, jet assisted plough, tracked devices or mechanical cutting. The technique used is chosen so it is suitable for the seabed conditions.	Section 10.2 details the cable installation.
		The techniques which could be used for the modified export cable landfall and intertidal area include open cut trenching, ploughing, dredging, mechanical cutters and HDD.	Section 12.1.2 details the cable installation at the landfall.
	CBRA	Further analysis will be carried out on the site seabed conditions as part of the cable protection and burial study. The study will consider the technically and economically	Section 10 details the CBRA.

Source	Cable element	Modified TI ES parameter/commitment	Final design parameter/relevant section of OfTI CaP
		achievable burial depths based on the export cable corridor site specific ground conditions.	
		Cables will be buried to a target depth of 1 m, where it is technically practicable to do so, which will reduce the risk to fishing vessels from snagging. In instances where adequate burial cannot be achieved an appropriate cable protection will be used. Over-trawlability surveys will be undertaken as necessary along areas of the cable route where potential snagging risks could be located, to reduce risks to the vessels operating trawled gear.	Moray East have designed an Overtrawl Methodology in conjunction with the local fishing industry and agreed with MS-LOT. This document outlines the methodology which guides the selection process for overtrawl locations and provides a high-level summary of the techniques which should be employed during the survey. The agreed methodology can be found in Appendix 3 of this document.
	EMF	The sheathing and armoured cores prevent the propagation of E fields into the environment, however, these materials are permeable to B fields, which therefore emanate into the surrounding environment. The expected B fields generated by OEC and inter-platform AC cables are, taking cable burial to 1 m, well below the Earth's magnetic field (assumed to be 50 NT).	Section 11.3: the predicted magnetic field levels at seabed level associated with the buried cables if they are buried to 1.0m is lower than the value associated with the earth's magnetic field.
		Cable burial will reduce exposure of electromagnetically sensitive species to the strongest EMFs that exist at the "skin" of the cable owing to the physical barrier of the substratum (OSPAR, 2008). Similarly, where burial is not feasible, cable protection will ensure that fish and shellfish receptors are not in direct contact with the cable and will not be exposed to the strongest EMFs.	Section 12.1.14: where the minimum Depth of Lowering (DoL) cannot be achieved, then appropriate means of additional protection will be employed.
	Remedial protection	Where burial depth cannot be achieved, cable armouring will be implemented (e.g. rock placement or concrete mattresses). The suitability of installing rock or concrete mattresses for cable protection, especially around the structure bases, will be assessed based on the seabed current data across the proposed development area and the assessed risk of impact damage.	Section 12.1.14: where the minimum Depth of Lowering (DoL) cannot be achieved, then appropriate means of additional protection will be employed.
		The use of best practice to minimise the quantities of scour and cable protection material will reduce loss of original seabed habitat and habitat change.	Section 10 details the CBRA. Scour protection is detailed within the combined CoP and CMS.

Source	Cable element	Modified TI ES parameter/commitment	Final design parameter/relevant section of OfTI CaP
		For most of the OEC route it is expected that the cables will be in trenches for protection. However, should the seabed contain areas of rock at, or close to the surface which is potentially unsuitable for trenching, cables may be laid on the seabed. Where this occurs, the cable will be protected by graded rock placement, concrete mattresses or other suitable protective coverings.	Section 12.1.14: where the minimum Depth of Lowering (DoL) cannot be achieved, then appropriate means of additional protection will be employed.
	Mitigation of impacts on other users of sea	Embedded mitigation for Shipping and Navigation: <ul style="list-style-type: none"> Burial of the cable to a minimum of 1m and/or protection; Charting of cables as per UKHO requirements; Monitoring – depth and coverage surveys during the operational phase of the cables. 	Section 10 details the cable burial specifications. Section 13.1 details post installation surveys.
		Sections of the cable route identified to be high risk areas from anchoring and fishing activity will be buried to a suitable depth to protect against vessel anchors and fishing gear. Where a suitable burial depth is unachievable, the cables will be protected with concrete mattresses and / or rock placement.	Section 10 details the CBRA and 12.1.14 details remedial protection.
	Mitigation of impacts on archaeology	Avoidance of known undesignated Cultural Heritage Assets by micrositing where possible within the modified OfTI export cable route corridor.	Section 9.1
	Third party cables in proximity and cable crossings	Consultation has been undertaken with Faroese Telecom (the operator of the SHEFA–2 cable) and they have not raised an objection to the Moray East Project. Further discussions will result in cable crossing / proximity agreements being secured which will include detailed crossing conditions and methodology. Faroese Telecom will also be notified of any Moray East works within 1,000 m of the SHEFA–2 cable.	Section 11.2 details the third party cables in proximity to the OEC.
		Where the cable must cross existing infrastructure, such as other cables, special arrangements will be required. For example, a layer of concrete mattresses or grout bags may be fitted over the top of the existing cable. The new cable will be run over this protective layer and then itself protected with a further layer of mattresses or grout bags. The methodology for crossing arrangements will be developed in agreement with third	Section 11 provides detail on cable crossing.

Source	Cable element	Modified TI ES parameter/commitment	Final design parameter/relevant section of OfTI CaP
		party cable owner / operators where relevant.	
	Post installation surveys	During operation, the export cable will be monitored to ensure that cables remain buried and any scour effects remain within the range of that predicted in the ES.	Section 13.1 details post installation surveys.
		Periodic and planned surveys of the export cable routes will be carried out to monitor burial depths / protection and seabed mobility.	Section 13.1 details post installation surveys.

Appendix 2 Export Cable Route Biotope Assessment



MORAY EAST

OFFSHORE WINDFARM

EXPORT CABLE ROUTE BIOTOPE ASSESSMENT

August 2018

Moray Offshore Windfarm (East) Limited

Produced by Fugro GB Marine Ltd. on behalf of Moray Offshore Windfarm (East) Limited



Produced by	PAE
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Moray East Ecological Check of Works	Moray East
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List of Abbreviations

CaP	Cable plan
CMS	Construction method statement
CoP	Construction programme
EC	European Community
EDA	Eastern development area
EIA	Environmental impact assessment
ES	Environmental statement
JNCC	Joint Nature Conservation Review
MNCR	Marine Nature Conservation Review
OfTI	Offshore transmission infrastructure
OSP	Offshore substation platforms
PEMP	Project environmental monitoring programme
PMF	Priority Marine Feature
SACFOR	Superabundant, abundant, common, frequent, occasional, rare
SSS	Sidescan sonar
TI	Transmission infrastructure

Definitions

The following definitions have been used throughout this document with respect to the company, the consented wind farms and how these definitions have changed since submission of the Moray East Environmental Statement (ES) in 2012 and the Modified Transmission Infrastructure ES in 2014.

- **Moray Offshore Windfarm (East) Limited (formerly known as Moray Offshore Renewables Limited and hereinafter referred to as Moray East)** – the legal entity submitting this Construction Programme (CoP) and Construction Method Statement (CMS) document;
- **Moray East Offshore Windfarm** - the wind farm to be developed in the Moray East site (also referred as the Wind Farm);
- **The Moray East Site** - the area in which the Moray East Offshore Wind Farm will be located. Section 36 Consents and associated Marine Licences to develop and operate up to three generating stations on the Moray East site were granted in March 2014. At that time the Moray East site was known as the “Eastern Development Area (EDA)” and was made up of three sites known as the Telford, Stevenson and MacColl offshore wind farm sites; The Section 36 Consents and Marine Licences were subsequently varied in March 2018;
- **Telford, Stevenson and MacColl wind farms** – these names refer to the three consented offshore wind farm sites located within the Moray East site;
- **Transmission Infrastructure (TI)** - includes both offshore and onshore electricity transmission infrastructure for the consented Telford, Stevenson and MacColl wind farms. Includes connection to the national electricity transmission system near New Deer in Aberdeenshire encompassing AC offshore substation platforms (OSPs), AC OSP interconnector cables, AC export cables offshore to landfall point at Inverboyndie continuing onshore to the AC collector station (onshore substation) and the additional regional Transmission Operator substation near New Deer. A Marine Licence for the offshore TI was granted in September 2014 and a further Marine Licence for two additional distributed offshore substation platforms (OSPs) was granted in September 2017. The onshore TI was awarded Planning Permission in Principle in September 2014 by Aberdeenshire Council and a Planning Permission in Principle under Section 42 in June 2015;
- **Offshore Transmission Infrastructure (OfTI)** – the offshore elements of the transmission infrastructure, comprising AC OSPs, OSP inter-connector cables and AC export cables offshore to landfall (for the avoidance of doubts some elements of the OfTI will be installed in the Moray East site);
- **Moray East ES 2012** – The ES for the Telford, Stevenson and MacColl wind farms and Associated Transmission Infrastructure, submitted August 2012;
- **Moray East Modified TI ES 2014** – the ES for the TI works in respect to the Telford, Stevenson and MacColl wind farms, submitted June 2014;
- **The Development** – the Moray East Offshore Wind Farm and Offshore Transmission Infrastructure (OfTI);
- **Design Envelope** - the range of design parameters used to inform the assessment of impacts; and
- **OfTI Corridor** – the export cable route corridor, i.e. the OfTI area as assessed in the Moray East Modified TI ES 2014 excluding the Moray East site.

- **Moray East Offshore Wind Farm Consents** – are comprised of the following:

Section 36 Consents:

- Section 36 consent for the Telford Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Telford Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the Stevenson Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Stevenson Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the MacColl Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the MacColl Offshore Wind Farm assigned to Moray East on 19 June 2018.

Marine Licences

- Marine Licence for the Telford Offshore Wind Farm (as varied) – Licence Number: 04629/18/0 – consent under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area¹.
 - Marine Licence for the Stevenson Offshore Wind Farm (as varied) – Licence Number: 04627/18/0 – consent under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area¹.
 - Marine Licence for the MacColl Offshore Wind Farm (as varied) – Licence Number: 04628/18/0 (as varied) - consent under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area¹.
- **OfTI Licences** – are comprised of the following:
 - Marine Licence for the Offshore Transmission infrastructure – Licence Number 05340/14/0 – consent under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OfTI Marine Licence”).
 - Marine Licence for two additional distributed OSPs – Licence Number 06347/17/1 – consent under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction, operation and maintenance works and the deposit of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OSP Marine Licence”).

¹ Transfer of the Marine Licence to Moray East was requested on the 25 June 2018.

Executive Summary

This document has been prepared by Fugro GB Marine Ltd. on behalf of Moray Offshore Wind Farm (East) Limited. It presents a map of classified seabed habitats and biotopes, including valued benthic features, within the boundaries of the offshore export cable route, and is intended to inform the final Offshore Transmission Infrastructure (OfTI) Cable Plan (CaP) and to also meet the benthic ecological monitoring obligations of the Project Environmental Monitoring Programme (PEMP).

Site specific benthic ecological and geophysical data were used to prepare the map. Despite some variation in substrate composition throughout the cable corridor, seabed habitats fell within two broad habitat types and two detailed biotopes.

The broad habitats were identified and classified as SS.SSa and SS.SMx.CMx defining a range of sand and mixed coarse sediment biotopes respectively. These habitat types reflected historic observations from previous benthic studies at Smith Bank and the Jacky oil field.

The two detailed biotopes included SS.SMu.CFiMu.SpMmeg and CR.MCR.EcCr.FaAlCr.Pom. The former detailed biotope is a component of Scotland's '*burrowed mud*' Priority Marine Feature (PMF) and is known to dominate the seabed within the wider southern Moray Firth area. It describes seapens and burrowing megafauna in muddy circalittoral sand and was found throughout much of the export cable corridor below 50 m depth. It has previously been allocated to similar seabed areas at the adjacent Beatrice offshore wind farm development (located approximately 20 km west of the current route) and was attributed to the comparatively deeper water sections of the Beatrice export cable corridor (BOWL, 2012; 2013). Furthermore, the Joint Nature Conservation Committee (JNCC) has recorded this biotope within the vicinity of the current study area as indicated by JNCC non-core records.

The latter detailed biotope describes encrusting fauna on moderately exposed rock and is illustrative of Annex I (EC Habitats Directive 92/43/EEC) stony and rocky (geogenic) reef rock habitat. It was comparatively restricted in its distribution within the consented offshore cable corridor and was only found within the shallow nearshore waters close to the cable landfall site at Inverboyndie. While only recorded across a limited area within the current cable corridor, rocky habitats appear to be well represented throughout the coast and nearshore regions of the southern Moray Firth and were recorded at the Beatrice offshore wind farm export cable site.

The map delineates the extents of the classified habitats and biotopes in relation to the cable corridor and thus informs the final CaP design and meets the PEMP requirements with respect to benthic ecological monitoring.

1 Introduction

Following successful award of respective Marine Licences and positive Section 36 consent decisions for the wind farm, Moray Offshore Windfarm (East) Limited (Moray East) are now seeking to prepare for the construction of the Moray East Offshore Wind Farm and associated transmission infrastructure. Construction of the Offshore Transmission Infrastructure (OfTI) will include the installation of three export cable circuits (the OfTI corridor) between the area of the Moray East Offshore Wind Farm and the landfall site located near Inverboyndie.

Environmental considerations relating to the construction and operation of cables have been addressed in detail in the Moray East Modified TI ES (2014) and have informed the development of a number of conditions attached to the current OfTI Marine Licence. The methods by which environmental conditions will be met are explained in the Project Environmental Monitoring Programme (PEMP) and the OfTI Cable Plan (CaP) and include *inter alia* presentation of pre-construction benthic survey data and the distribution and extents of Annex I and Priority Marine Features (PMF) to inform cable micro-siting and installation methods.

This document is intended to accompany the OfTI CaP and contributes to both the discharging of OfTI CaP licence conditions and meeting the PEMP requirements with regards to informing cable installation and benthic ecological monitoring. Specifically, it presents the findings of a synthesis of site specific geophysical and benthic ecological data to identify and delineate the Annex I and PMF habitats and to help position and install the export cables so that potential adverse effects on environmentally sensitive seabed features are minimised. Habitats are presented for the currently preferred 'primary' export cable route in the form of a habitat distribution (biotope) map. The biotope map fulfils the PEMP requirement for benthic monitoring and provides the basis for the delivery of the OfTI CaP. In addition, habitat and biotope observations are compared with those found previously during other studies within the outer Moray Firth to provide wider context.

2 Methodologies

2.1 Benthic Ecology Data Collection

Benthic ecology data for the export cable route were collected over ten days (16 to 26 May 2014) using digital video and stills cameras. The survey was conducted in accordance with the following guideline;

- Cefas guidance on the conduct of benthic studies at aggregate dredging sites (Ware & Kenny, 2011).

Cameras were fixed to a seabed sledge and towed from a vessel throughout the length of the OfTI corridor, from the offshore wind farm to a point located just offshore of the proposed landfall site, typically around the 5 m contour. The work was undertaken on a 24-hour basis and provided a continuous video record of the seabed habitats and epifaunal species between the wind farm and local shallow waters just offshore of the landing site. The video was overlaid with real-time differential GPS positions with appropriate lay-backs applied for geo-referencing. Observer records were collated throughout the video deployment including substrate type and conspicuous epifauna together with any observations of burrows and tubes, (i.e. *Nephrops* burrows). Photographic stills of representative habitat types and species were also collected during the survey.

The continuous video and stills cameras collected geo-referenced information on the presence and status of seabed habitats and conspicuous epibenthic (seabed surface dwelling) species. Physico-chemical sediment data were collected using a 0.1 m² grab sampler also deployed from the vessel.

Benthic ecology survey methods were approved by Marine Scotland Science prior to mobilisation and followed Cefas Guidelines described in Ware & Kenny (2011). Methods were also consistent with those applied at the three consented wind farms and at the Beatrice Offshore Wind Farm to ensure data compatibility across the Moray developments and to allow a consistent EIA and cumulative effects assessment. Details of the survey methodology, together with the full results of the benthic ecology survey of the OfTI corridor, are presented in Technical Appendix 4.4 A of the Modified TI Environmental Statement (ES).

2.2 Geophysical Data Collection

Geophysical (acoustic) data, including sidescan sonar (SSS) and swath bathymetry, were collected separately from the ecology survey and were provided to Fugro by Moray East. Figures 2-1 and 2-2 present the extents of the SSS and swath bathymetry data respectively.

The data provided included mosaiced acoustic datasets collected in 2014, 2017 and 2018 as ArcGIS shapefiles showing the distribution of seabed reflectivity, textures and depth gradients throughout the cable corridor between the wind farm and a point offshore of the landfall site. In addition to the acoustic data sets, the results of geophysical borehole sampling surveys conducted in 2014 and 2018 along the route of the export cables were also provided to Fugro (see Figures 2-3). These included visual descriptions of the surficial and sub-surface seabed sediments obtained from borehole samples.

2.3 Data Analysis

Video and photographic stills data were analysed following Joint Nature Conservation Committee (JNCC) Marine Monitoring Handbook. Procedural Guideline No. 3.5. Identifying biotope using video recordings (JNCC, 2001).

In addition to the on-site observer records, the entire seabed video footage for the cable corridor survey area was reviewed at 4 times normal speed and the positions of the boundaries between different sediment habitats were recorded. Determination of the different sediment habitat types was undertaken following the Folk classification (Long, 2006) in conjunction with the Wentworth (1922) classification as presented within Table 2-1. Observations of the borehole samples collected during the geotechnical campaigns were used to corroborate the seabed video/photographic data.

Table 2-1: Sediment Particle Sizes and Classification Terms

Particle Size	Corresponding Folk Class	Wentworth (1922) Classification
> 256 mm	NA	Boulder
> 64 to 256 mm		Cobble
> 2 to 64 mm	Gravel	Gravel/Pebble
> 62.5 µm to 2 mm	Sand	Sand
> 4 to 62.5 µm	Mud	Silt
> 1 to 4 µm		Clay

The video footage was then viewed again at normal speed, on software which enabled freeze frame, and slower than normal playback to allow the faunal component to be assessed. High resolution stills were used to aid identification of fauna where necessary.

Epifauna observed from the video were recorded and semi-quantified using the SACFOR abundance scale (Hiscock, 1996) (Table 2-2). Where the abundance of taxa could not be estimated, these were recorded as Present (P) only.

Table 2-2: Marine Nature Conservation Review (MNCR) SACFOR Abundance Scale

Growth Form			Size of Individuals/Colonies				Density
%Cover	Crust/	Massive	< 1 cm	1-3 cm	3-15 cm	>15 cm	
> 80 %	S		S				> 1/0.001 m ²
40 – 79 %	A	S	A	S			1 - 9/0.001 m ²
20 – 39 %	C	A	C	A	S		1 - 9/0.01 m ²
10 – 19 %	F	C	F	C	A	S	1 - 9/0.1 m ²
5 – 9 %	O	F	O	F	C	A	1 - 9/ m ²
1 – 5 %	R	O	R	O	F	C	1 - 9/10 m ²
< 1 %		R		R	O	F	1 - 9/100 m ²
					R	O	1 - 9/1000 m ²
						R	< 1/1000 m ²
Notes: S = Superabundant, A = Abundant, C = Common, F = Frequent, O = Occasional, R = Rare							

2.4 Geophysical Data Treatments

Upon receipt, the sidescan sonar (SSS) and swath bathymetry mosaics were uploaded to ArcGIS. Within the SSS data, the boundaries of each sediment acoustic region were determined and mapped to create a wire-frame diagram of polygons illustrating the distribution and extents of distinct seabed habitat types. Discrimination between sediment acoustic regions was largely undertaken by eye within ArcGIS to determine differences in reflectivity and texture. Lighter reflectivity was generally indicative of softer seabed substrates such as sand and muddy sand while areas of darker reflectivity corresponded to areas of coarser gravel and cobble substrate and rock. Bathymetry data were used to corroborate the boundary locations visible in the SSS data as necessary. Each polygon was then attributed a biotope classification based on the associated sediment type and conspicuous epifauna identified from the video and stills images as described below.

2.5 Biotopes Classification

The sediment and species data derived from the seabed video and still image analyses were used to classify a series of biotopes which were then used to attribute each polygon. The system used to classify each biotope was the 'The Marine Habitat Classification for Britain and Ireland – Version 15.03' (JNCC, 2015) habitat classification system and the allocation of biotopes was based on Joint Nature Conservation Review (JNCC) guidance (Perry, 2015).

Note that biological communities and marine environments can be highly dynamic and temporally variable, and therefore the biotopes and habitats identified by the current assessment are representative of the survey area at the time of sampling only. Although a biotope can be assigned to any sized area of seabed, for the purposes of this assessment the commonly accepted minimum habitat size of 25 m² (Connor et al., 2004) was adopted.

Key to a successful CaP is the accurate mapping of potentially sensitive habitats so that these can be considered during cable installation activities. This includes the identification and mapping of cobble and/or stony reef features which have been noted during similar surveys at the adjacent Beatrice offshore wind farm and which have been considered as being potential Annex I (EC Habitats Directive 92/43/EEC) geogenic reef. To assist the identification and delineation of potential Annex I geogenic reef, the following definitions for 'reefiness' were used as presented in Table 2-3.

When considering the potential of an area as stony reef, the composition of the substrate is an important characteristic. Stony reef is defined as comprising coarse sediments with a diameter greater than 64 mm (cobbles and boulders) that provide a hard substratum. The relationship between the coarse material and sediment in which it lies is integral in determining 'reefiness'. Matrix (soft sediment) supported material is likely to have a patchier distribution than clast (coarse sediment) supported and so have lower 'reefiness', additionally matrix supported material is likely to have a larger infaunal component which again reduces its 'reefiness' (Irving, 2009). Reefs are also defined as having relief from the seafloor, and as such relief is used as another criterion for assessment. The epifaunal community of potential reef habitat is also a key determinant of its 'reefiness' and percentage cover of fauna is therefore included as an assessment criterion. Within the Irving (2009) scheme, areas of potential stony reef habitat must have an area of greater than 25 m² to be classified as reef; this report also adopts this minimum area.

Table 2-3: Measure of Geogenic (stony) 'Reefiness'

Measure of 'Reefiness'	Reef Category			
	NOT REEF	LOW	MEDIUM	HIGH
Composition Diameter of cobbles/boulders being greater than 64 mm. Percentage cover relates to a minimum area of 25 m ² . This 'composition' characteristic also includes 'patchiness'.	< 10 %	10 – 40 % Matrix supported	40 % - 95 %	>95 % Clast supported
Elevation Minimum height (64 mm) relates to minimum size of constituent cobbles. This characteristic could also include 'distinctness' from the surrounding seabed. Note that two units (mm and m) are used here.	Flat seabed	< 64 mm	64 mm – 5 m	> 5 m
Extent	< 25 m ²	> 25 m ²		
Biota				> 80 % of

3 Results

The biotope map showing the extents and distribution of seabed habitats within the boundaries of the OfTI corridor is presented in Figure 3-1. A summary of the sediment types and epibenthic assemblages for each of different variants of each of the biotopes found is presented in Table 3-1. Figure 3-2 presents the distribution of the principal sediment types (gravel, sand and silt) throughout the OfTI corridor collected by the grab sampler during the site-specific benthic ecology survey (see Technical Appendix 4.1A).

Four habitats/biotopes were classified along the OfTI corridor although these often occurred both singly and as twinned mosaics. In addition, it was noted that some areas of the OfTI corridor comprised a dominant muddy sand substrate which was overlaid by veneers of coarser sand and gravelly sand of various thicknesses. This resulted in a patchwork or mosaic of sediment biotopes across some areas. From the video and stills images it appeared that the overlying deposits were transient and/or mobile, as indicated by the presence of coarse sediment ripples or waves lying over the finer sand substrata.

While it was possible to discern the coarser substrate from the finer substrate within the side scan sonar data, it was decided to map these as one unit in those places where they co-occurred. This not only facilitated the mapping process but also partitioned areas where habitat boundaries may be variable over time because of the influence of naturally mobile or transient sediments. Furthermore, the sediment composition of the biotopes varied along the length of the cable corridor, possibly in response to the differing influences of transient sediments in some places and differing quantities of shell material. These variations were detectable within the SSS data in places.

Despite apparent variations, all sediment and species associations were allocated to one of the four biotope classifications as follows;

- Level 3 main habitat SS.SSa (subtidal sands and muddy sand)
- Level 4 biotope complex SS.SMx.CMx (circalittoral mixed sediment)
- Level 5 Biotope SS.SMu.CFiMu.SpnMeg (seapens and burrowing megafauna in circalittoral fine mud)
- Level 6 Sub-biotope CR.MCR.EcCr.FaAlCr.Pom (faunal and algal crusts with *Pomatoceros triqueter* and sparse *Alcyonium digitatum* on exposed to moderately exposed circalittoral rock.

The main biotope (SS.SSa) and the biotope complex (SS.SMx.CMx) are broad classifications encapsulating a range of more detailed biotope types some of which may have been present within the study area at a finer spatial scale. For example, sediment conditions and associated epibenthos in some places supported the presence of the Level 5 biotope '*Flustra foliacea* and *Hydrallmania falcata* on tide-swept circalittoral mixed sediment', SS.SMx.CMx.FluHyd although the patchy distribution and generally low growth of the characterising species did not warrant separate mapping of this biotope. Similarly, the presence of tubes of the polychaetes worms *Owenia fusiformis* and *Lanice conchilega* within areas of sand may have indicated the presence of certain types of polychaete dominated biotopes.

The Level 5 SS.SMu.CFiMu.SpnMeg biotope is a detailed biotope describing '*Seapens and burrowing megafauna in circalittoral fine mud*'. It was attributed to the majority of the OfTI corridor below approximately the 50 m contour based on the widespread occurrence of 'sea-pen and burrowing megafauna communities' evident from the video and stills images.

Rather than the high levels of mud normally associated with this biotope, historic grab sampling along the OfTI corridor (see Technical Appendix 4.1 A of the ES) revealed a predominately slightly gravelly muddy sand sediment within the areas designated as SS.SMu.CFiMu.SpMg (Figure 3-2). On average, sand comprised 73% and mud comprised 27%. The geotechnical vibrocore campaign conducted at this time (Gardline, 2014) also indicated a predominately silty fine to medium sand within the area with varying proportions of broken shell gravel.

JNCC (2014) notes there is no direct relationship between the habitat classification biotopes and 'sea pens with burrowing megafauna communities' because of the presence of gaps and variant biotope forms and that additional data, such as seabed imagery, would be required to classify potentially representative biotopes as this habitat. While it is acknowledged that a broader SS.SMu.CFiMu classification matched the observations made, the presence of a consistently highly bioturbated seabed with dense burrows and mounds together with characterising sea pen species such as *Virgularia mirabilis* and *Pennatula phosphorea*, seemed to warrant a more detailed definition. Furthermore, this biotope was allocated to similar areas of seabed at Beatrice (BOWL, 2012, 2013).

Referring back to the findings of the original benthic ecology study (see Technical Appendix 4.1A of the modified OfTI ES), and which has been reviewed and accepted by Marine Scotland, the presence of a comparatively sandy seabed was remarked upon but a SS.SMu.CFiMu.SpMg classification was allocated, nonetheless. Specifically, Technical Appendix 4.1A noted that;

"when first encountered, the sea pen and burrowing megafauna community SS.SMu.CFiMu.SpMg occurred in the form of a coarse sediment variation of this biotope. SpMg was clearly indicated but the sedimentary conditions excluded the classical representation associated with Nephrops grounds. The main fauna noted were flat fish, gurnards, a few starfish and pagurid crabs. Hydroid/bryozoan turf of largely indefinable composition was scattered throughout. King scallop occurred sporadically. Of note was the abundance of the slender sea pen Virgularia mirabilis which was very evident and occurred frequently whilst only one phosphorescent sea pen Pennatula phosphorea was noted".

Additionally, it is worth noting JNCC (2014) guidance on this matter which states that;

"The [sea pen and burrowing megafauna communities] habitat occurs predominately in fine mud sediments. However some examples of this habitat have been identified in areas of sandy muds. As such, where there is clear evidence of the relevant biological assemblages (burrowing megafauna and in some examples, sea-pens), such habitats can be classified as 'Sea-pen and burrowing megafauna communities' regardless of the grain size composition of the sediment"

Sediment composition notwithstanding, the SS.SMu.CFiMu.SpMg was used here to represent the sea pen and burrowing megafauna habitat which was clearly present within the OfTI corridor. This biotope is known to occur within the general area of the outer southern Moray Firth, as indicated by JNCC non-core records¹ (see <http://jncc.defra.gov.uk/marine/biotopes/biotope.aspx?biotope=JNCCMNCR00001218>), and previous benthic ecology investigations at the now consented Beatrice offshore wind farm

¹ While core records include those on which the biotope description has been based, non-core records represent other certain records where this biotope has been found (<http://jncc.defra.gov.uk/page-3106>).

have already allocated this biotope to large areas of adjacent seabed (BOWL, 2012; 2013). Thus, while it is possible that other classifications could also be applied to bioturbated seabed areas with sea pens and burrowing megafauna within the current OfTI corridor, the previous use and acceptance of the SS.SMu.CFiMu.SpMg in the locale and presence of JNCC non-core records would seem to suggest that it is an acceptable alternative to use on this occasion.

It is also worth considering that the SS.SMu.CFiMu.SpMg biotope is a component of the 'burrowed mud' habitat which is a priority marine feature (PMF) in Scotland and which is one of a number of PMF's identified by the Scottish nature conservation agencies to help focus conservation action within Scotland's seas. Scottish records of the burrowed mud habitat are considered to be of international importance (Tyler-Watts et al, 2016). Burrowed mud is also a cited interest feature underpinning the proposed Southern Trench Marine Protected Area (MPA) and which is likely to be intersected by the current export cable route. The allocation of this biotope both here and the adjacent Beatrice development, thus serves to flag the likelihood of the presence a potentially significant habitat within planned development footprint and supports good practice in highlighting valued benthic receptors.

Given the wide spread distribution of this habitat type throughout the wider region, it will not be possible for the cable to avoid the area designated as SS.SMu.CFiMu.SpMg. However, any construction effects on the seabed are expected to only affect a very small proportion of total habitat available within the southern Moray Firth.

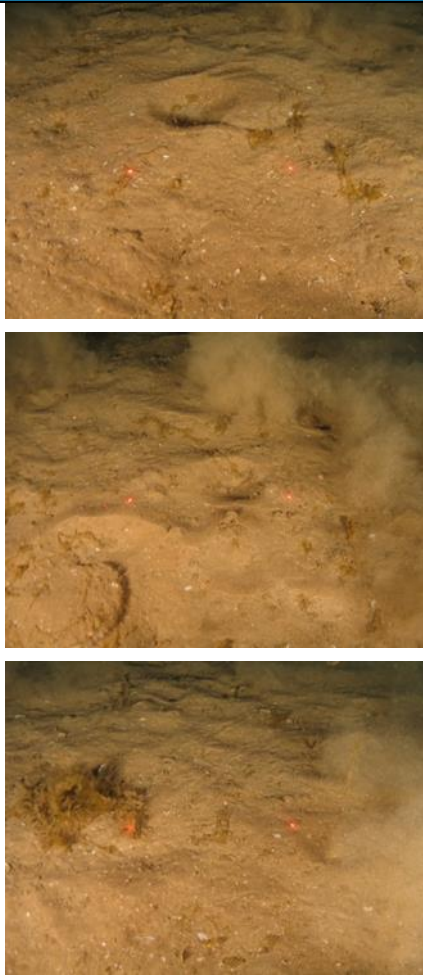
The CR.MCR.EcCr.FaAlCr.Pom biotope is also a detailed biotope describing '*Faunal and algal crusts with Pomatoceros triqueter and sparse Alcyonium digitatum on exposed to moderately wave-exposed circalittoral rock*'. It is illustrative of the Annex I (EC Habitats Directive 92/43/EEC) geogenic reef and includes areas of cobbles, boulders and rocky outcroppings. Matching the attributes of these habitats from the video with the criteria showed in the Table 2-3 suggested a low to medium resemblance with Annex I geogenic reef.


Within the acoustic datasets, the stony and rocky habitats were readily identifiable as areas of particularly dark and variable reflectivity and were topographically distinct from the surrounding sand seabed area allowing confident mapping of reef boundaries.


The data showed that hard stony and rock habitats were limited in distribution within the cable corridor and only occurred as a relatively small discrete area located close to the shore at the cable landfall site at Inverboyndie. Nonetheless, JNCC online mapping of potential reef across the wider Moray Firth http://jncc.defra.gov.uk/default.aspx?page=5201&LAYERS=Reef_All,TwelveTS,UKCS shows that much of the adjacent Moray comprises stony and bedrock and stony reef and it is likely that the local feature within the cable corridor is contiguous with the wider rock and stony reef within the region.

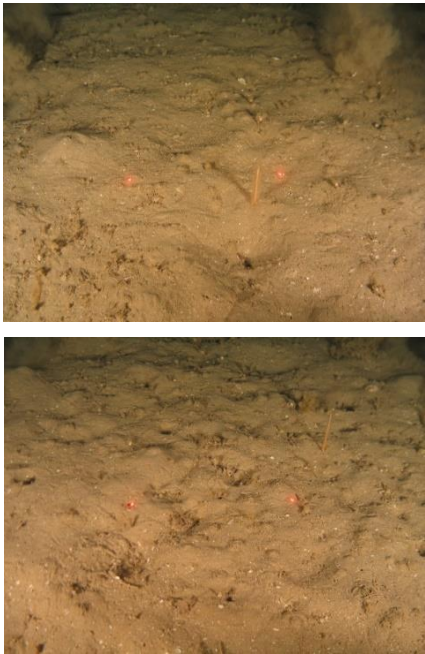
Moray Offshore Windfarm (East) Limited Export Cable Route Biotope Assessment


Table 3-1. Biotope classifications and summary epibenthic species and sediment descriptions

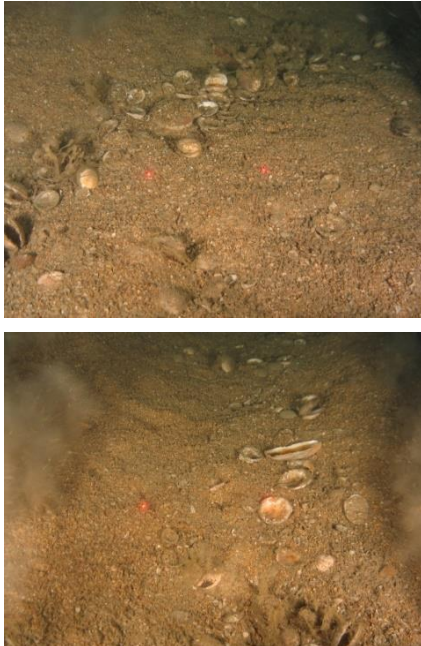
Biotope	Sediment and Fauna Description	Species	Representative Images
Biotope SS.SSa (Variant 1) (Offshore Area) Sublittoral sand and muddy sands.	Sediment Description Slightly shelly, slightly muddy sand. Small holes or burrows in the seabed were regularly recorded across the area of habitat. Fauna within them were not evident. Small areas of dense and coarse shelly sand forming sand ripples with coarse shell aggregations in the troughs were noted. Fauna Fauna included Pagurid crabs, and fish including gurnards, thick backed sole, flat fish, (often plaice), and gadiform fish. Occasional King scallops (<i>Pecten maximus</i>) and small numbers of starfish were also seen. Mixed hydroid/bryozoan turfs and the erect bryozoan <i>Flustra foliacea</i> were rarely observed and were confined to the small amounts of slightly coarser sediment present. Across the habitat area a gelatinous, filamentous substance, believed to be a diatomaceous floc was observed. It occurred as small oozes from the sediment and formed long filaments. At times, it was observed as a coating on other hydroid/bryozoan growths.	<i>Alcyonidium diaphanum</i> <i>Alcyonium digitatum</i> <i>Asterias rubens</i> Asteroidea Callionymidae <i>Chaetopterus</i> tubes Decapoda Diatomaceous aggregation <i>Flustra foliacea</i> Gadiformes Hydroid/Bryozoan mixed substrate Inachinae <i>Luidia ciliaris</i> <i>Microchirus variegatus</i> Paguridae <i>Pecten maximus</i> PLEURONECTIFORMES Triglidae	

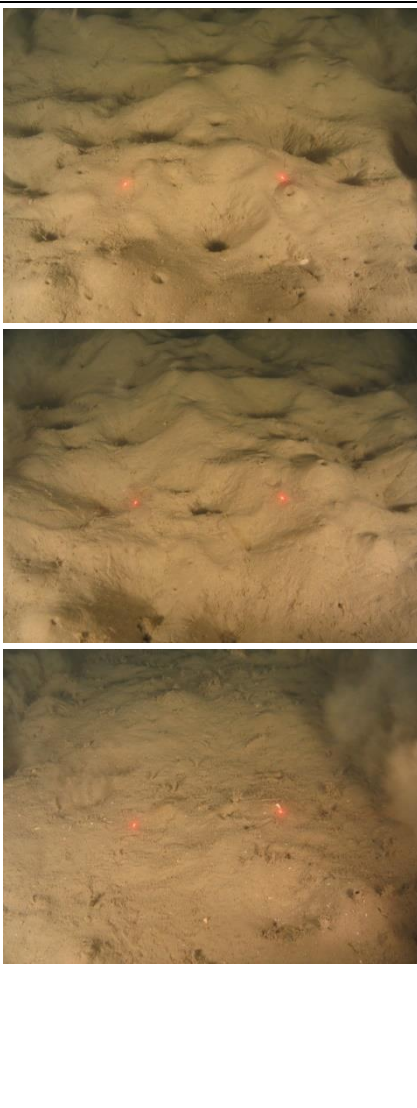
<p>SS.SSa with SS.SMx.CMx (Variant 1)</p> <p>Sublittoral sand and muddy sands with circalittoral mixed sediment.</p> <p>(Offshore Area)</p> <p>An additional biotope FluHyd may be appropriate to classify the biotope in some areas.</p>	<p>Slightly shelly, slightly muddy rippled sand. Sediment ripples comprising coarse shelly sand occurred across the habitat area with mixed gravel, pebbles and cobbles present within the troughs between sediment ripples. Areas of coarse mixed sediment supported sessile epifauna comprising foliose hydroids and bryozoans. Small holes and small burrows within the seabed sediment were recorded across the area.</p> <p>Fauna The fauna comprised pagurid crabs, a few small crabs (notably <i>Liocarcinus</i>) and flat fish including plaice and thick backed sole. A variety of starfish were distributed across the area. The foliose hydroid/bryozoan turf including <i>Flustra</i> and <i>Hydrallmania</i> were largely concentrated on the areas of coarse mixed sediment. A rare occurrence of the anemone <i>Metridium senile</i> was seen on a large cobble. King scallops (<i>Pecten maximus</i>) were more notable across both the sandy and coarser sediments of the site. One gadoid fish was seen, potentially hake.</p> <p>Note Area noted for sand eels (Ammodytidae). WGS84 Degminsdecmins 58 09.2191N, 002 40.8778W To 58 09.2923N, 002 40.8623W Area with noted greater density of King scallops (<i>Pecten maximus</i>) 58 09.4445N, 002 40.8467W</p>	<p>?<i>Pleuronectes platessa</i> ?<i>Thuiaria thuja</i> <i>Alcyonium digitatum</i> Ammodytidae <i>Aphrodita aculeata</i> <i>Asterias rubens</i> ASTEROIDEA <i>Astropecten irregularis</i> <i>Buccinum undatum</i> Callionymidae <i>Cancer pagurus</i> CARIDEA <i>Chaetopterus tubes</i> <i>Crossaster papposus</i> DECAPODA(?<i>Liocarcinus</i>.) <i>Tubularia indivisa</i> <i>Echinus esculentus</i> <i>Flustra foliacea</i> Gadiformes <i>Hydrallmania falcata</i> Hydroid/Bryozoan mixed substrate <i>Liocarcinus</i> <i>Luidia sarsi</i> <i>Metridium senile</i> <i>Microchirus variegatus</i> <i>Ophiura ophiura</i> Paguridae <i>Pecten maximus</i> PLEURONECTIFORMES Plumulariidae <i>Securiflustra securifrons</i> <i>Spirobranchus</i> Triglidae <i>Trisopterus lamarkii</i></p>	
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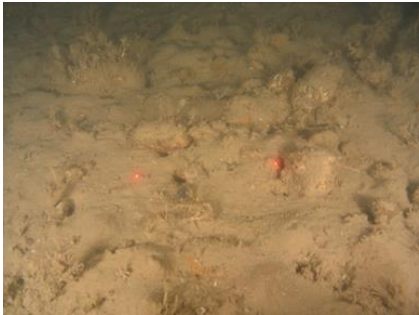
<p>Biotope</p> <p>SS.SSa (Variant 2) Sublittoral</p> <p>sand and muddy sands</p>	<p>Sediment Description</p> <p>Slightly shelly, slightly muddy rippled sand. Coarse shelly sand waves occurred overlaid the area in places. Broken shell hash and a few pebbles were noted within the troughs between the sand waves. Small holes and small burrows were present across the area.</p> <p>Fauna</p> <p>The main fauna noted were occasional flat fish, gurnards, one gadiform fish, occasional starfish and pagurid crabs. Mixed hydroid/bryozoan turfs were frequently observed on areas of coarse sediment throughout the habitat area. One brittlestar (<i>Ophiura ophiura</i>) and one sea mouse (<i>Aphrodita</i>) was observed. The potential diatomaceous floc material was present across both sand and coarse sand wave areas.</p>	<p>?<i>Pleuronectes platessa</i> <i>Aphrodita aculeata</i> <i>Asterias rubens</i> <i>Astropecten irregularis</i> Callionymidae <i>Flustra foliacea</i> Gadiformes <i>Hydrallmania falcata</i> Hydroid/Bryozoan mixed substrate <i>Liocarcinus</i> <i>Microchirus variegatus</i> <i>Ophiura ophiura</i> Paguridae <i>Pecten maximus</i> Pectinidae PLEURONECTIFORMES Triglidae</p>	
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<p>Biotope</p> <p>SS.SMu.CFiMu.SpnMeg (Variant 1)</p> <p>Seapens and burrowing megafauna in circalittoral fine mud</p>	<p>Sediment Description</p> <p>Slightly shelly, slightly muddy rippled sand. Small holes and small burrows present across the habitat area. Larger fractions of shell hash visible in places.</p> <p>Fauna</p> <p>The main fauna noted were flat fish, gurnards, a few starfish and pagurid crabs. Hydroid/bryozoan turfs were occasionally recorded throughout the habitat. One <i>Ophiura ophiura</i> was seen. King scallops (<i>Pecten maximus</i>) occurred sporadically. The diatomaceous floc was present across the area. The seapen <i>Virgularia mirabilis</i> occurred frequently. Only one individual of <i>Pennatula phosphorea</i> seapen was noted.</p>	<p><i>Alcyonium digitatum</i> <i>Asterias rubens</i> <i>Astropecten irregularis</i> Callionymidae <i>Chaetopterus</i> tubes Diatomaceous aggregation Echinoidea <i>Henricia</i> Hydroid/Bryozoan mixed substrate <i>Ophiura ophiura</i> Paguridae <i>Pecten maximus</i> <i>Pennatula phosphorea</i> PLEURONECTIFORMES Triglidae <i>Virgularia mirabilis</i></p>	
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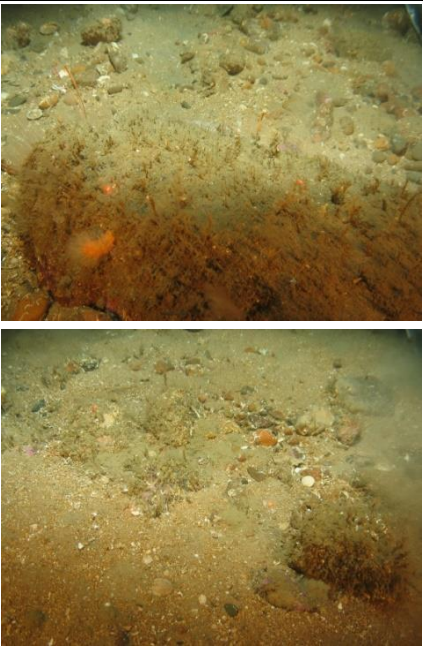
Biotope	Sediment Description		
<p>SS.SSa with SS.SMx.CMx (Variant 2)</p> <p>Sublittoral sand and muddy sands with Circalittoral mixed sediment.</p> <p>CMx, forming waves, dominated the area. Some support for the additional FluHyd allocation in places.</p> <p>Although biotope already allocated in the offshore area, kept separate here due to denser coarse waves rather than coarse sediment patches.</p>	<p>The habitat area was dominated by coarse mixed sediment forming small to approx. 0.5m high coarse gravelly shelly sand waves in places. Large broken shell hash and gravel and pebbles deposits occurred within the troughs between the sand waves. One small boulder seen. The habitat was also interspersed with slightly shelly, slightly muddy rippled sand. Small holes and small burrows were recorded throughout the habitat.</p> <p>Fauna</p> <p>The main fauna noted were hydroid/bryozoan turf, including <i>Flustra</i>, <i>Sertularia</i>, <i>Abietinaria</i> and potentially <i>Thuiaria thuja</i>. Flat fish, a few starfish and pagurid crabs were evident, along with the round crab <i>Atelecyclus rotundatus</i>. <i>Munida rugosa</i> was occasionally seen in the coarse sediment. One <i>Ophiura ophiura</i> was noted. <i>Pecten maximus</i> occurred relatively regularly throughout.</p> <p>Note. <i>Pecten maximus</i> noted in higher density in this area.</p>	<p>?<i>Abietinaria abietina</i> ?<i>Thuiaria thuja</i> <i>Asterias rubens</i> <i>Atelecyclus rotundatus</i> Bryozoa crust Callionymidae Diatomaceous aggregation <i>Flustra foliacea</i> Gadiformes Hydroid/Bryozoan mixed substrate <i>Luidia ciliaris</i> <i>Munida rugosa</i> <i>Ophiura ophiura</i> Paguridae <i>Pecten maximus</i> PLEURONECTIFORMES <i>Sertularia</i> <i>Spirobranchus</i> <i>Trisopterus lamarkii</i> <i>Urticina</i></p>	




<p>Biotope</p> <p>SS.SMx.CMx (Variant 1)</p> <p>Circalittoral mixed sediment.</p> <p>Some support for the additional FluHyd allocation in places.</p>	<p>Sediment Description</p> <p>This habitat type was dominated by coarse mixed sediment forming small to approx. 0.5m high coarse gravelly shelly sand waves in places. Large shell hash and gravelly pebbles deposited within the recesses with the occasional cobble. One small boulder seen.</p> <p>Fauna</p> <p>The main fauna noted were foliose hydroid/bryozoan turf, including <i>Flustra</i>, and <i>Sertularia</i>. A few starfish and pagurid crabs were evident, along with <i>Munida rugosa</i> which was occasionally seen in the coarse sediment. One <i>Ophiura ophiura</i> was noted. <i>Pecten maximus</i> occurred rarely.</p>	<p><i>Agonus cataphractus</i> <i>Alcyonium digitatum</i> Buccinidae Callionymidae <i>Flustra foliacea</i> Hydroid/Bryozoan mixed substrate <i>Luidia sarsi</i> <i>Munida rugosa</i> <i>Ophiura ophiura</i> Paguridae <i>Pecten maximus</i> <i>Sertularia</i></p>	
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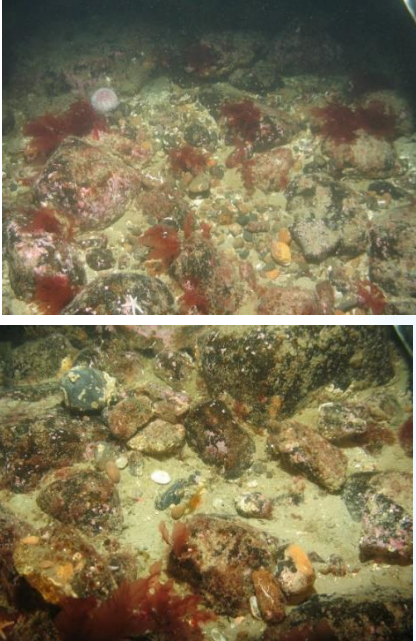
<p>Biotope</p> <p>SS.SMu.CFiMu.SpnMeg (Variant 2)</p> <p>Seapens and burrowing megafauna in circalittoral fine mud</p> <p>Note that in the more southerly areas of the cable route, the burrowed mud habitat supported occasional hydroids, <i>Tubularia</i>.</p>	<p>Sediment Description</p> <p>This habitat was characterized by a muddy fine sand sediment with numerous burrows, sediment mounds and holes indicating and area of active bioturbation.</p> <p>In some areas, a low lying form was observed comprising a relatively even seabed surface with small burrows, small mounds and holes. While bioturbation activity was evident it was not as deep or dense as other areas. The occasional small boulder, and area of coarser sediment, with a few cobbles, and mixed pebbles and shell hash were recorded in places.</p> <p>Fauna</p> <p>Burrowing megafauna evident, including the sea pen <i>Pennatula phosphorea</i> and in some areas, <i>Virgularia mirabilis</i>. <i>Nephrops norvegicus</i> was sporadically seen in the video. Flat fish were also present, and a few starfish were recorded including <i>Anseropoda placenta</i>. Pagurid crabs and the occasional Decapod (?<i>Liocarcinus</i>) also noted. Gurnards, small gadoid fish and brow crab (<i>Cancer pagurus</i>) were also observed.</p> <p>In the low-lying form of the biotope, burrowing megafauna included the seapen <i>Pennatula phosphorea</i>. Flat fish and a few starfish were also seen, as well as a few large King scallops. The coarser substrate had denser aggregations of hydroid/bryozoan turf, and a very small amount of <i>Tubularia indivisa</i>. Boulders supporting <i>Metridium senile</i> were present. Sediment with small polychaete tubes forming a 'mat', believed to be Oweniidae, were occasionally recorded.</p>	<p>?<i>Echinocardium cordatum</i> <i>Anguilla anguilla</i>/<i>Myxine glutinosa</i> <i>Anseropoda placenta</i> <i>Asterias rubens</i> ASTEROIDEA <i>Asteroidea</i> (?<i>Leptasterias muelleri</i>) <i>Astropecten irregularis</i> Callionymidae <i>Cancer pagurus</i> <i>Chaetopterus</i> tubes DECAPODA (?<i>Liocarcinus</i>) Gadiformes Gobiidae Henricia Hydroid/Bryozoan mixed substrate <i>Liocarcinus</i> <i>Lumpenus lampretaeformis</i> <i>M. merlangus</i> or <i>T. minutus</i> Majoidea <i>Nephrops norvegicus</i> <i>Ophiura ophiura</i> Paguridae <i>Pennatula phosphorea</i> PLEURONECTIFORMES Triglidae <i>Tubularia indivisa</i> <i>Virgularia mirabilis</i></p> <p>low lying and coarser area <i>Asterias rubens</i> <i>Asteroidea</i> (<i>Asterias</i> or ?<i>Leptasterias muelleri</i>) Callionymidae <i>Ceramaster/Hippasteria</i></p>	
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		<i>Echinus esculentus</i> Hydroid/Bryozoan mixed substrate <i>Lanice conchilega</i> <i>Metridium senile</i> <i>Munida rugosa</i> Paguridae <i>Pecten maximus</i> <i>Pennatula</i> <i>phosphorea</i> PLEURONECTIFORMES <i>Porania pulvillus</i> Tubes in Sediment (Oweniidae) <i>Tubularia indivisa</i>	
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<p>Biotope</p> <p>SS.SMx.CMx</p> <p>Within SS.SMu.CFiMu.SpnMeg</p> <p>Circalittoral mixed sediment. within Sea pens and burrowing megafauna in circalittoral fine mud</p> <p>There may be some support for the additional FluHyd allocation in places.</p>	<p>Sediment Description</p> <p>Low lying, relatively even sandy mud/muddy sand with small burrows, small mounds and holes. Bioturbation evident but not as deep or dense as areas more suited to <i>Nephrops norvegicus</i>. Within this area, large sections of coarse mixed sediment with boulders and cobbles occurred.</p> <p>Fauna</p> <p>Burrowing megafauna evident in the softer sediment. The coarse section was dominated by hydroid/bryozoan turfs, small amounts of <i>Tubularia indivisa</i>, and common <i>Munida rugosa</i> under the boulders and cobbles. Occasional <i>Echinus esculentus</i> and a few <i>Pecten maximus</i> seen. One <i>Cancer pagurus</i> seen.</p>	<p><i>Cancer pagurus</i> <i>Ceramaster/Hippasteria</i> <i>Echinus esculentus</i> <i>Hydrallmania falcata</i> Hydroid/Bryozoan mixed substrate <i>Munida rugosa</i> <i>Nemertesia</i> <i>ramosa Pecten maximus</i> <i>Sertularia</i> Spirobranchus <i>Tubularia indivisa</i></p>	
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<p>Biotope</p> <p>SS.SMx.CMx (Variant 2)</p> <p>Circalittoral mixed sediment.</p> <p>Fauna not considered dense enough to support the additional allocation of FluHyd.</p>	<p>Sediment Description</p> <p>Area of hard ground, potentially bedrock in places. Area over-laid with a very coarse mixture of shelly sandy, gravelly pebbly cobble matrix with the occasional boulder. A thin covering of mobile sand of varying depths evident over the hard ground.</p> <p>Fauna</p> <p>Fauna largely comprised of coralline algae and bryozoan crusts with sparse outcrops of foliose hydroid/bryozoan turf including <i>Flustra foliacea</i> and Plumulariidae, with rare <i>Tubularia indivisa</i>. Very small outcrops of <i>Alcyonium digitatum</i> were present, and rare <i>Echinus esculentus</i>. Lots of <i>Munida rugosa</i> were present under the boulders and cobbles, with small crabs such as <i>Liocarcinus</i> evident. Occasionally a large edible crab, <i>Cancer pagurus</i> was seen and a very occasional <i>Pecten maximus</i>. Small starfish were scattered across the area.</p> <p>Debris of fishing ropes present.</p>	<p><i>Alcyonium digitatum</i> <i>Asterias rubens</i> ASTEROIDEA Bryozoa crust <i>Cancer pagurus</i> Corallinaceae <i>Echinus esculentus</i> <i>Flustra foliacea</i> Hydroid/Bryozoan mixed substrate <i>Liocarcinus</i> <i>Metridium</i> <i>senile</i> <i>Munida rugosa</i> Paguridae <i>Pecten maximus</i> Plumulariidae <i>Sabella</i> tube <i>Spirobranchus</i> <i>Tubularia indivisa</i> <i>Urticina</i></p>	
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<p>Biotope</p> <p>SS.SMx.CMx with SS.SSa (Variant 3)</p> <p>Circalittoral mixed sediment with Sublittoral sand and muddy sands</p> <p>Fauna not considered dense enough to support the additional allocation of FluHyd. Small areas could potentially be called an impoverished form.</p>	<p>Sediment Description</p> <p>This variant habitat type comprised hard ground in places, over- laid with a very coarse mixture of shelly sand, gravel, pebbles and cobble with a few boulders in places. A thin covering of mobile sand of varying thicknesses present overlaying the hard ground. In places, extensive patches of rippled sand occurred, before returning to coarse mixed sediment. In places and particularly further offshore, the sand became coarser and thicker in some areas, forming coarse sand waves with large shell debris within the wave troughs.</p> <p>Fauna</p> <p>The coarse ground supported sparse hydroid/bryozoan turf with a few starfish, small amounts of the soft coral <i>Alcyonium digitatum</i>, <i>Tubularia indivisa</i>, and <i>Urticina</i>. Boulders were particularly covered in dense hydroid/bryozoan turf, with large clusters of <i>Flustra foliacea</i>. <i>Munida rugosa</i> were regularly seen across the area under the coarser sediment. <i>Pecten maximus</i> and the occasional <i>Cancer pagurus</i> were often seen. In some of the patches of sand, <i>Lanice conchilega</i> tubes were present together with smaller tubes believed to be of the family Oweniidae. In the deeper coarser sand waves, sand eels were often recorded.</p>	<p><i>?Omalosecosa ramulosa</i> <i>Agonus</i> <i>cataphractus</i> <i>Alcyonium</i> <i>digitatum</i> Ammodytidae Bryozoa crust Callionymidae <i>Cancer pagurus</i> <i>Chaetopterus</i> tubes <i>Crossaster</i> <i>papposus</i> DECAPODA (<i>?Liocarcinus</i>) <i>Echinus</i> <i>esculentus</i> <i>Flustra</i> <i>foliacea</i> Gobiidae <i>Henricia</i> Hydroid/Bryozoan mixed substrate <i>Lanice conchilega</i> <i>Liocarcinus</i> <i>Metridium senile</i> <i>Munida rugosa</i> Paguridae <i>Pecten maximus</i> PLEURONECTIFORMES Plumulariidae <i>Porania pulvillus</i> PORIFERA <i>Spirobranchus</i> Triglidae <i>Trisopterus esmarkii</i> Tubes in Sediment (Oweniidae) <i>Tubularia indivisa</i> <i>Urticina</i></p>	<p>Lanice and Oweniidae</p>  <p>Coarse mixed sediment</p>  
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<p>Biotope</p> <p>Inshore Sand SS.SSa (Variant 3)</p> <p>Sublittoral sand and muddy sands.</p> <p>Bedrock and boulder reef with algae CR.MCR.EcCr.FaAlCr.Pom (sheltered inshore variant)</p> <p>Bedrock and boulder reef CR.MCR.EcCr.FaAlCr.Pom</p> <p>Faunal and algal crusts with <i>Pomatoceros triqueter</i> and sparse <i>Alcyonium digitatum</i> on exposed to moderately wave-exposed circalittoral rock</p>	<p>Sediment Description</p> <p>Inshore area a rippled sand with a few holes, with a biofilm evident across the area.</p> <p>From the inshore sand, the area gradually became a bedrock and boulder reef, with a small outcrop of rock with the brown alga <i>Saccharina latissima</i> and long foliose red and brown algal fronds. Where the reef became more established, only foliose red algal fronds remained, <i>?Delesseria sanguinea</i>, before the alga cover reduced completely. The area then became a bedrock, boulder and cobble reef, undulating and rising to around 1 to 2.0m approx. in height at its greatest point. A cobble, pebble and gravelly sand matrix evident within the recesses in places. There were small areas where a thin film of sediment was evident on the hard rock surfaces.</p> <p>Fauna</p> <p>Only a few flat fish were evident on the inner shore sand area. The areas of bedrock and boulder reef were covered by a brown algal crust with red coralline algae and bryozoan crusts. <i>Spirobranchus</i> worm tubes were frequently observed. The urchin <i>Echinus esculentus</i> occurred commonly across the area, along with a frequent presence of the soft coral <i>Alcyonium digitatum</i>. Small starfish (Asteroidea) were also recorded frequently noticeable, probably <i>Asterias rubens</i> but confirmation difficult. <i>Crossaster papposus</i> also occurred commonly. <i>Cancer pagurus</i> was noted occasionally.</p>	<p>Sand</p> <p>ASTEROIDEA PLEURONECTIFORMES Biofilm</p> <p>Algae additions to reef</p> <p><i>Saccharina latissima</i> <i>?Delesseria sanguinea</i> Red and brown algal turf - long</p> <p>Reef</p> <p><i>?Abietinaria abietina</i> Hydroid/Bryozoan turfs <i>Alcyonium digitatum</i> <i>Urticina</i> <i>Metridium senile</i> <i>Spirobranchus</i> <i>Munida</i> <i>rugosa</i> <i>Cancer pagurus</i> <i>Gibbula</i> Bryozoa crust ASTEROIDEA <i>Marthasterias glacialis</i> <i>Crossaster papposus</i> <i>Echinus esculentus</i> Labridae Corallinaceae Encrusting brown algae</p>	<p>Inshore sand with biofilm</p>  <p>Reef with algae</p> 
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			<div>Reef</div> <div></div>
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<p>Biotope</p> <p>SS.SSa (Variant 4)</p> <p>Sublittoral sand and muddy sands.</p>	<p>Sediment Description</p> <p>Rippled sand with a few holes, becoming gradually coarser further offshore. Ripples becoming more mixed and larger in form.</p> <p>Fauna</p> <p>A few starfish are scattered across the area, with large pagurid crabs, a few flat fish and a few gadoid fish in places. One monkfish seen. As the sand became coarser, sand eel activity became more apparent.</p>	<p>DECAPODA (?<i>Liocarcinus</i>)</p> <p>Paguridae</p> <p><i>Cancer pagurus</i></p> <p><i>Astropecten irregularis</i></p> <p>ASTEROIDEA</p> <p><i>Lophius piscatorius</i></p> <p>Ammodytidae</p> <p>Gadiformes</p> <p>Gobiidae</p> <p>PLEURONECTIFORMES</p>	
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4 Discussion and Conclusions

Seabed video and photographic stills images are frequently used to ground truth geophysical datasets for the purposes of segmenting areas of seabed into distinct benthic habitat types. Here, the technique has been successfully employed to discriminate between soft sediment, coarse mixed sediment and hard seabed substrate types throughout the export cable corridor and to classify and map these according to the UK biotope classification system.

Overall, there was good agreement between the seabed images and the interpretation of the geophysical data despite these datasets being collected at different times. Soft sediment areas corresponded with low reflectivity acoustic regions while coarser and hard seabed types matched heterogeneous high reflectivity signatures.

Marine Scotland digital national maps (NMPi)² and EU SeaMap 2³ online map data classify the marine sediments between the Moray offshore wind farm and the planned export cable landfall site at Inverboyndie as offshore deep circalittoral sand with deep circalittoral mud and circalittoral and infralittoral coarse sediments occurring closer inshore. Nearshore and coastal habitats are dominated by high and moderate energy rock interspersed by areas of littoral sand and sandy embayments. These classifications align with the subtidal sands and muddy sands, bedrock and boulder reefs, circalittoral mixed sediments and burrowed mud habitats classified during the current study. The different types of seabed habitats identified from the video and stills images were thus readily discriminated within the acoustic data allowing for confident interpolation and attribution of those seabed areas which were not represented by video data.

As explained in the initial benthic ecology survey (see Technical Appendix 4.1A) benthic studies within the Moray Firth have typically focused on the Smith Bank and the Beatrice Field (Eleftheriou *et al.*, 2004). The communities studied on the Smith Bank and Beatrice field have shown considerable persistence in the medium term (Eleftheriou *et al.*, 2004). This suggests relatively stable environments.

Samples of medium to coarse sands taken just north-east of the Beatrice oilfield for the Jacky oilfield development (Ithaca Energy, 2008) were mostly dominated by *S. bombyx*, *T. pygmaea*, *C. pratenue* and *E. pusillus*. Two stations with high proportions of gravel and pebbles were dominated by epifaunal species such as *G. intermedia* and *L. asellus*.

In their analysis of the North Sea Benthos Project 2000 data, Rees *et al.* 2007 grouped sites in the Moray Firth with those in the central and northern North Sea at depths > 50 m (mean depth of 96 m). These sites were composed of muddy sand and fine sand and had *Myriochele* sp., *A. filiformis* and *Spiophanes* spp. as the dominant fauna (Rees *et al.*, 2007; Reiss *et al.*, 2009).

Beatrice Offshore Wind Ltd (BOWL) undertook a comparable cable route video survey just over 20 km west of the proposed corridor as part of the EIA investigations and development application for the Beatrice Offshore Wind Farm (BOWL, 2012 and 2013). This also found burrowed mud and fine-medium sand with shell fragments. In the offshore area, the burrowed mud habitat, although with a low density of sea pens, was identified as the biotope SS.SMu.CFiMu.SpnMeg - Sea pens and burrowing megafauna in circalittoral. Inshore areas were mainly fine-medium sands and gravels with small patches of cobble reef. This area was considered to be a fairly rich example of the biotope SS.SCS.CCS.PomB *Pomatoceros triqueter* with barnacles, coralline algae and bryozoan crusts on unstable circalittoral cobbles and pebbles. It was noted that the biotope may be considered as being potential Annex I cobble reef (Irving, 2009). The sublittoral area closest to the shore was recorded as being composed very clean fine sand with no visible epifauna.

² <https://marinescotland.atkinsgeospatial.com/nmpi/>

³ <https://www.emodnet-seabedhabitats.eu/access-data/>

The OSPAR Threatened and Declining (T&D) habitat 'Sea-pen and burrowing megafauna communities' has been found across the southern half of the Moray Firth. This habitat broadly equates to the burrowed mud MPA search feature. Burrowed mud extends across the southern half of the Moray Firth and as such is likely to intersect with the cable route. The biotope 'Seapens and burrowing megafauna in circalittoral soft mud' SS.SMu.CFiMu.SpnMeg (Connor *et al.*, 2004) is considered a component of both the OSPAR T&D and PMF "burrowed mud" habitat features. Furthermore, Greathead *et al.* (2007) have maps showing the location of seapens around Scotland with both *Pennatula phosphorea* and *Virgularia mirabilis* found at various locations in the Moray Firth.

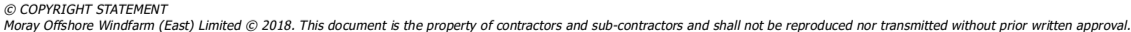
While the habitats and biotopes found within the export cable corridor are generally common at both regional and national scales, the SS.SMu.CFiMu.SpnMeg and CR.MCR.EcCr.FaAlCr.Pom biotopes are nonetheless representative of valued benthic features in Scotland. The SpnMeg biotope was allocated to the majority of offshore areas of the OfTI corridor below the 50 m contour. This biotope is likely to form part of the extensive 'burrowed mud' habitat known to occur throughout the southern Moray Firth. The FaAlCr.Pom biotope, on the other hand, was comparatively restricted in its distribution, and was found only within the shallow inshore waters close to the landfall site at Inverdoynie. However, it is likely to be contiguous with the coastal rocky habitats found throughout the southern Moray Firth.

In conclusion, current observations of subtidal mixed coarse sediments and muddy sand sediments appear to match historic records for this area. Two broad habitats and two detailed biotopes have been classified and mapped using acoustic and seabed video data. The two detailed biotopes are indicative of valued seabed features including a Scottish PMF and an Annex I (EC Habitats Directive) habitat. The biotope map and associated GIS layers showing the extents of these biotope boundaries are presented to inform the final CaP and meet the benthic ecological monitoring requirements as described in the PEMP.

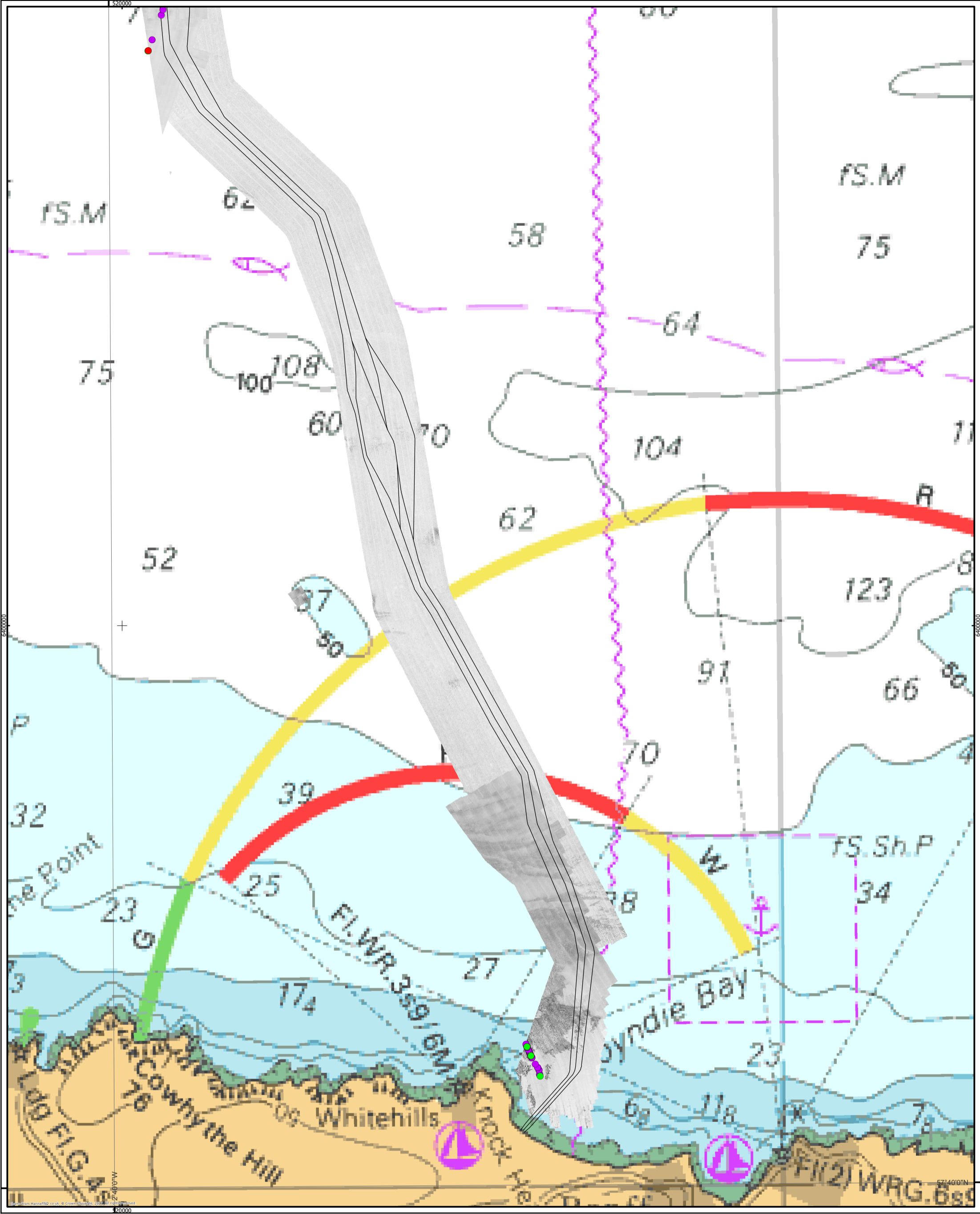
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FIGURES

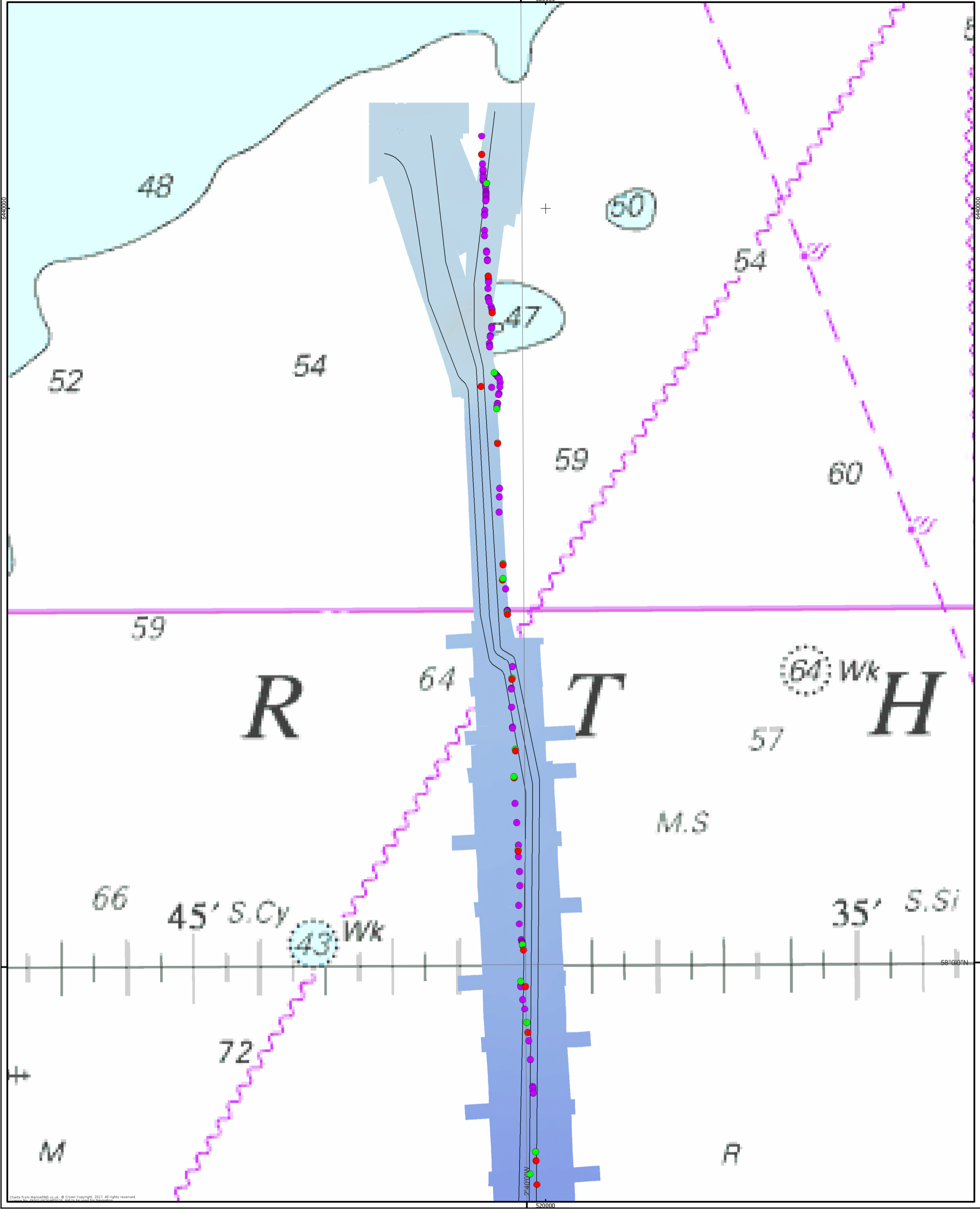


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			Date: 11/09/2018 Revision: A
<p>Geodetic Parameters: WGS84 UTM Zone 30N Horizontal Scale: 1:50,000 A3 Chart</p>			REF: 8460001-AA0000-AAA-AAA-001
			Figure 2-1 Sidescan Sonar Mosaic
			Chart: 2 of 3
			Moray Offshore Windfarm (East) Ltd



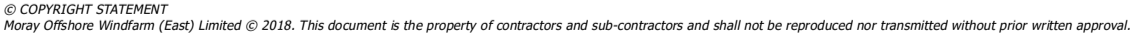
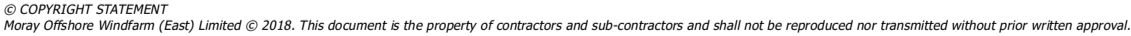
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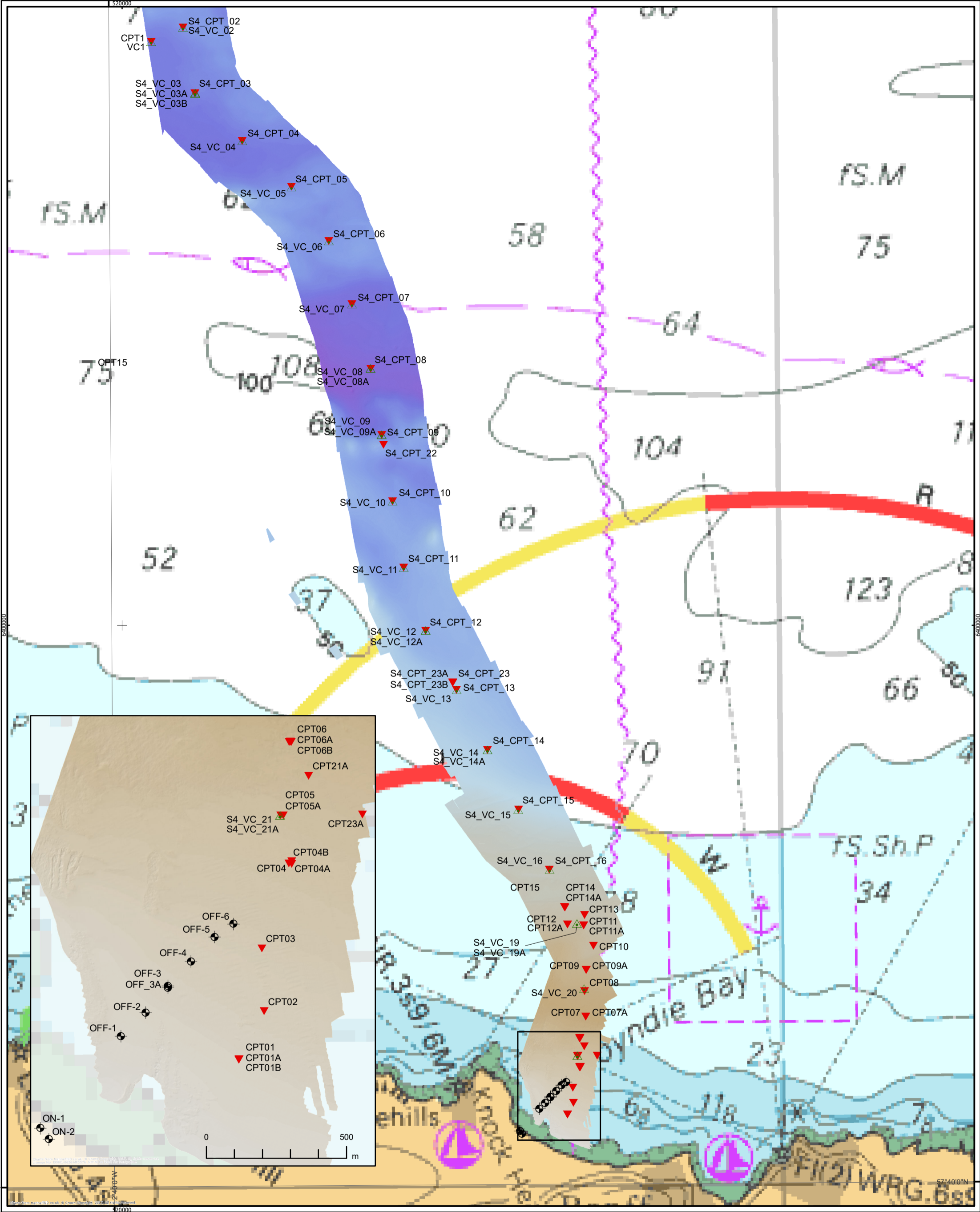
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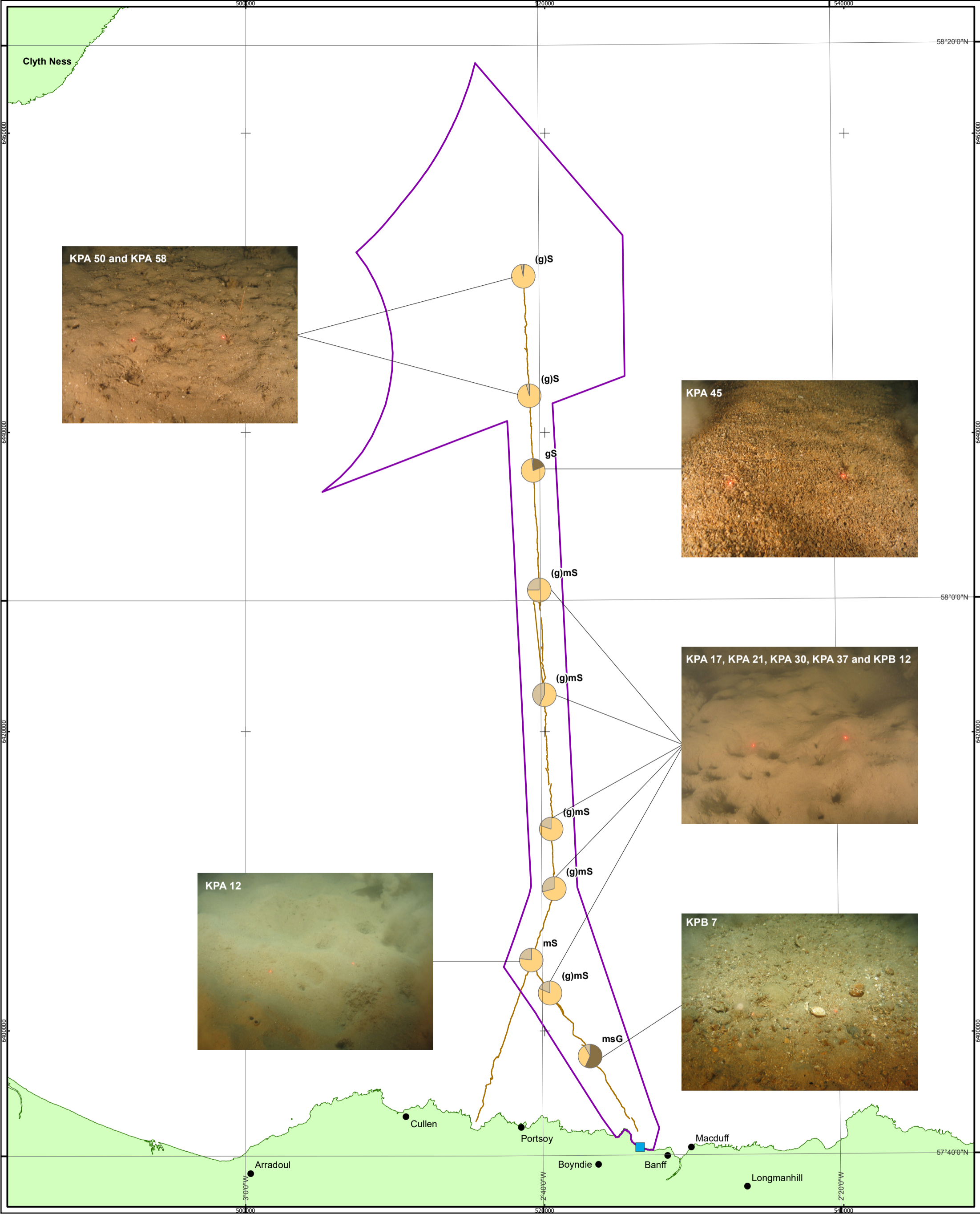
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<div></div> <div>Geodetic Parameters: WGS84 UTM Zone 30N Horizontal Scale: 1:225,000 A3 Chart 0 2,000 4,000 Meters</div>	<div>KEY Consenting Area Cable Route Landing Site Video Transect</div> <div>Principal Sediment Components (%) Gravel Sand Mud Sediment Classification according to Folk, 1954.</div>	<div>Produced: TN Reviewed: JB Approved: PE</div> <div>Date: 10/09/2018 Revision: B REF: 8460001-AAA0000-AAA-AAA-004</div> <div>Figure 3-2 Distribution of Principal Sediment Components</div> <div>Moray Offshore Windfarm (East) Ltd</div>
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MORAY EAST

OFFSHORE WINDFARM

Contact

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Appendix 3 Overtrawl Methodology

The logo features a large, light blue circular graphic composed of several curved segments, resembling a stylized sun or a wind turbine's rotation, positioned in the upper right background.

MORAY EAST

OFFSHORE WINDFARM

A series of overlapping, wavy horizontal lines in shades of blue and teal, spanning the width of the page, located just above the dark teal footer section.

Offshore Export Cable Overtrawl Survey Methodology

Moray East Offshore Wind Farm

July 2021

Moray Offshore Windfarm (East) Limited

Produced by Moray Offshore Windfarm (East) Limited	
Produced by	Chris Newman
Reviewed by	Silvia Gonzalez
Document Status	Final
File Name	8460001-PCA0030-MWE-REP-003
Date	19/07/2021

Review / Approval

Moray East Ecological Clerk of Works	Legal Review
Alexia Chapman [Royal HaskoningDHV]	Colin Innes [Shepherd and Wedderburn]

Moray East		
Mark Baxter [Head of Development]	Enrique Alvarez [Head of Construction]	Marcel Sunier [Project Director]

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List of Abbreviations

CaP	Cable Plan
CFWG	Commercial Fisheries Working Group
DoL	Depth of Lowering
HVAC	High Voltage Alternating Current
IAC	Inter-Array Cable
KP	Kilometre Point
m	Metre
Moray East	Moray Offshore Windfarm (East) Limited
MS-LOT	Marine Scotland Licencing and Operations Team
O&M	Operation and Maintenance
OEC	Offshore Export Cable
OfTI	Offshore Transmission Infrastructure
OFTO	Offshore Transmission Owner
OSP	Offshore Substation Platform
ROV	Remotely Operated Vehicle
SFF	Scottish Fishermen's Federation
TI	Transmission Infrastructure
UK	United Kingdom
WTG	Wind Turbine Generator

Definitions

The following definitions have been used throughout this document with respect to the company, the consented wind farms and how these definitions have changed since submission of the Moray East Environmental Statement (ES) in 2012 and the Moray East Modified Transmission Infrastructure ES in 2014.

- **Moray Offshore Windfarm (East) Limited (formerly known as Moray Offshore Renewables Limited)** – the legal entity submitting this Overtrawl Survey Methodology;
- **Moray East Offshore Wind Farm** - the wind farm to be developed in the Moray East site (also referred as the Wind Farm);
- **The Moray East site** - the area in which the Moray East Offshore Wind Farm will be located. Section 36 Consents and associated Marine Licences to develop and operate up to three generating stations on the Moray East site were granted in March 2014. At that time the Moray East site was known as the “Eastern Development Area” and was made up of three sites known as the Telford, Stevenson and MacColl offshore wind farm sites; The Section 36 Consents and Marine Licences were subsequently varied as described below;
- **Telford, Stevenson and MacColl wind farms** – these names refer to the three consented offshore wind farm sites located within the Moray East site;
- **Transmission Infrastructure (TI)** - includes both offshore and onshore electricity transmission infrastructure for the consented Telford, Stevenson and MacColl wind farms. Includes connection to the national electricity transmission system near New Deer in Aberdeenshire encompassing AC offshore substation platforms (OSPs), AC OSP interconnector cables, AC export cables offshore to landfall point at Inverboyndie continuing onshore to the AC collector station (onshore substation) and the additional regional Transmission Operator substation near New Deer. A Marine Licence for the offshore TI was granted in September 2014 and a further Marine Licence for two additional distributed OSPs was granted in September 2017. The onshore TI was awarded Planning Permission in Principle in September 2014 by Aberdeenshire Council and a Planning Permission in Principle under Section 42 in June 2015;
- **Offshore Transmission Infrastructure (OfTI)** – the offshore elements of the transmission infrastructure, comprising AC OSPs, OSP interconnector cables and AC export cables offshore to landfall (for the avoidance of doubts some elements of the OfTI will be installed in the Moray East site);
- **Moray East ES 2012** – The ES for the Telford, Stevenson and MacColl wind farms and Associated Transmission Infrastructure, submitted August 2012;
- **Moray East Modified TI ES 2014** – the ES for the TI works in respect to the Telford, Stevenson and MacColl wind farms, submitted June 2014;
- **Moray East OSP Environmental Report 2017** – the environmental report comprising of the “Statement Regarding Implications for the Modified TI ES 2014 and HRA”. The report was produced in support of the application submitted in May 2017 for the Moray East OSP Marine Licence;
- **The Development** – the Moray East Offshore Wind Farm and Offshore Transmission Infrastructure (OfTI);
- **Design Envelope** - the range of design parameters used to inform the assessment of impacts;
- **OfTI Corridor** – the export cable route corridor, i.e. the OfTI area as assessed in the Moray East Modified TI ES 2014 excluding the Moray East site;
- **The Applications** – (1) the Application letter and ES submitted to the Scottish Ministers on behalf of Telford Offshore Windfarm Limited, on 2nd August 2012 and the Additional

Ornithology Information submitted to the Scottish Ministers by Moray Offshore Renewables Limited on the 17th June 2013; (2) the Section 36 Consents Variation Application Report for Telford, Stevenson and MacColl Offshore Wind Farms dated December 2017 and (3) the Marine Licence Applications and associated documents submitted for the OfTI Licences and OSP Licences in April 2014 and May 2017 respectively;

- **Inter-array cables** – network of AC subsea cables connecting the wind turbine generators (WTGs) and the OSPs within the Moray East site;
- **OSP interconnector cables** – AC subsea cables connecting the OSPs within the Moray East site; and
- **Export cables (offshore and onshore)** – AC cables connecting the OSPs within the Moray East site to the transition joint bays at the cable landfall site and onward to the AC collector station (onshore substation) near New Deer.
- **Moray East Offshore Wind Farm Consents** – are comprised of the following:

Section 36 Consents:

- Section 36 consent for the Telford Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Telford Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the Stevenson Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the Stevenson Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the MacColl Offshore Wind Farm (as varied) – consent under section 36 of the Electricity Act 1989 for the construction and operation of the MacColl Offshore Wind Farm assigned to Moray East on 19 June 2018.

Marine Licences

- Marine Licence for the Telford Offshore Wind Farm (as varied on 22 March 2018, 19 July 2019, 27 April 2020 and 25 November 2020) – Licence Number: MS-00009051 (formerly 04629/20/0) – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- Marine Licence for the Stevenson Offshore Wind Farm (as varied on 22 March 2018, 19 July 2019, 27 April 2020 and 25 November 2020) – Licence Number: MS-00008985 (formerly 04627/20/0) – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on the 19 July 2018.
- Marine Licence for the MacColl Offshore Wind Farm (as varied on 22 March 2018, 19 July 2019, 27 April 2020 and 21 October 2020) – Licence Number: MS-00008972 (formerly 04628/20/0) - granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on the 19 July 2018.
- Marine Licence for Moray Offshore Windfarm (East) Limited (as varied on 31 July 2020 and 20 January 2021) – Licence Number: MS-00009022 (formerly 07086/20/1) – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009 (as amended), Part 4 Marine Licensing to deposit, backfill of seabed depressions within the Scottish Marine Area and the United Kingdom Marine Licensing Area.
- **OfTI Licences** – are comprised of the following:

- Marine Licence for the Offshore Transmission infrastructure (as varied on 19 July 2019 and 15 December 2020) – Licence Number MS-00008919 (formerly 05340/19/0) – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OfTI Marine Licence”)
- Marine Licence for two additional distributed OSPs (as varied on 19 July 2019) – Licence Number 06347/19/0 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction, operation and maintenance works and the deposit of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OSP Marine Licence”)

Executive Summary

This Offshore Export Cable (OEC) Overtrawl Survey Methodology has been prepared to address the requirement of the relevant condition attached to the OfTI Marine Licence issued to Moray Offshore Windfarm (East) Limited (Moray East).

The Offshore Export Cable Overtrawl Survey Methodology addresses the condition requiring the OfTI Cable Plan to include methodologies for over trawl surveys of the cables through the operational life of the works where mechanical protection of cables laid on the seabed is deployed. This Offshore Export Cable Overtrawl Survey Methodology includes methodologies for determining where overtrawl surveys are required to take place and describing how overtrawl surveys shall be carried out.

This methodology document addresses only the OECs. This is because installation of the OECs has been completed in advance of the IACs and OSP Interconnector Cables (thereby allowing overtrawl surveys to be completed as soon as possible); and because in the future it is expected that ownership of the OECs (and therefore responsibility for compliance with the conditions attached to the OfTI Marine Licence) will be transferred to an Offshore Transmission Owner (OFTO). A separate methodology document shall be produced to address the equivalent conditions attached to the Wind Farm Section 36 consents, which require the Wind Farm Cable Plan to include methodologies for over trawl surveys of the IACs.

1 Introduction and Consents Conditions

1.1 Background

Section 36 Consents were granted in March 2014 for the construction and operation of three offshore wind farms (Telford, Stevenson and MacColl) within the Moray East site. Marine Licences for the three offshore wind farms were granted in September 2014 (together the Section 36 Consents and Marine Licences for the Wind Farm are referred to as the Moray East Offshore Wind Farm Consents). The Wind Farm Section 36 Consents were varied in March 2018 and assigned to Moray East Offshore Wind Farm (East) Limited in June 2018. The Marine Licences were varied as detailed above and transferred to Moray East in July 2018.

Moray East was granted a Marine Licence for the Moray East Modified Offshore Transmission Infrastructure in September 2014 (OfTI Marine Licence) (which was subsequently varied as described above) comprising two Alternating Current (AC) Offshore Substation Platforms (OSPs), substructure and foundations for the OSPs, inter-platform cabling within the three consented Telford, Stevenson and MacColl wind farms (the OSP Interconnector Cables) and up to four triplecore submarine High Voltage Alternating Current (HVAC) export cables between the OSPs and the shore. In 2017 a Marine Licence was granted for two additional distributed OSPs (OSP Marine Licence) and subsequently varied in July 2019 (together these licences are referred to as the OfTI Marine Licences).

This OEC Overtrawl Survey Methodology is submitted in accordance with condition 3.2.2.10(f) attached to the OfTI Marine Licence.

Moray East is a joint venture partnership between Ocean Winds, Diamond Generating Europe and China Three Gorges and has been established to develop, finance, construct, operate, maintain and decommission the Moray East Offshore Wind Farm.

1.2 Objectives of this Document

The OfTI Marine Licence is subject to a variety of conditions that must be discharged through approval by the Scottish Ministers prior to the commencement of offshore construction. One such requirement is the approval of a Cable Plan, referred in this document as the OfTI CaP. Moray East produced and submitted an OfTI CaP¹ in advance of the commencement of construction, which was approved by MS-LOT on behalf of the Scottish Ministers.

The relevant conditions setting out the requirements for the OfTI CaP for approval are set out in full in Table 1-1 below.

This document is intended to satisfy the requirements of condition 3.2.2.10(f) of the OfTI Marine Licence which requires the submission of a Cable Plan to include “methodologies for over trawl surveys of the cables through the operational life of the Works where mechanical protection of cables laid on the seabed is deployed”. In the OfTI CaP previously submitted by Moray East, this part of the condition was referred to in Section 13 of the document which stated:

“The results of the Cable Burial Risk Assessment combined with the proposed installation methods suggest that target Depth of Lowering (DoL) should be achieved along the majority of the route, the minimum largely achievable elsewhere. However, should minimum DoL not be achieved in areas of high fishing intensity and substantial lengths of OEC require mechanical protection, any requirement for overtrawlability surveys and the appropriate methodologies will be discussed with the local fishing industry and agreed with MS-LOT. Moray East have liaised with the SFF and committed to further discussions on the methodologies for overtrawl surveys with stakeholders, and as soon as as-built information is available this will be provided for review. Following the review of the as built information

¹ Moray East Offshore Transmission Infrastructure Cable Plan. Document number 846001-PCA0030-MWE-REP-001. Version 2 dated 1 December 2020

Moray East has committed to discuss the scope and timings of overtrawl trials, if and where they are required.”

In accordance with that commitment, as installation of the OECs has now been completed, Moray East has discussed the requirement for overtrawl surveys with representatives of the local fishing industry and produced this methodology document to describe how the requirement for overtrawl surveys will be assessed, and how overtrawl surveys will be carried out where they are found to be required.

This document is not intended to address any of the other parts of OfTI Marine Licence condition 3.2.2.10 and Table 1-1 below indicates where these parts of the condition are addressed and have been previously approved.

This document is also not intended to address any of the conditions attached to Moray East’s Section 36 consents relating to the Wind Farm Cable Plan and the requirement for methodologies for overtrawl surveys of the cables within the scope of those consents.

Table 1-1: OfTI Marine Licence condition 3.2.2.10 reference documents

OfTI Marine Licence Condition 3.2.2.10 Text	Reference Document
The Licensee must, no later than 6 months prior to the Commencement of the Works, submit a CaP, in writing, to the Licensing Authority for their written approval. Such approval may only be granted following consultation by the Licensing Authority with the JNCC, SNH, MCA, and the SFF and any such other advisors or organisations as may be required at the discretion of the Licensing Authority. The CaP must be in accordance with the Application. The CaP must include the following:	OfTI Cable Plan
a. Details of the location and cable laying techniques for the cables;	OfTI Cable Plan Section 3, 9 and 10
b. The results of survey work (including geophysical, geotechnical and benthic surveys) which will help inform cable routing;	OfTI Cable Plan Section 8
c. A pre-construction survey for Annex 1 habitat and priority marine features to inform cable micro-siting and installation methods in consultation with the Licensing Authority and their advisors;	OfTI Cable Plan Sections 8 and 9
d. Technical specification of all cables, including a desk based assessment of attenuation of electro-magnetic field strengths and shielding;	OfTI Cable Plan Sections 7 and 11
e. A burial risk assessment to ascertain if burial depths can be achieved. In locations where this is not possible then suitable protection measures must be provided;	OfTI Cable Plan Section 10
f. Methodologies for over trawl surveys of the cables through the operational life of the Works where mechanical protection of cables laid on the seabed is deployed; and	OfTI Cable Plan Section 13 and this document
g. Measures to address exposure of any cables.	OfTI Cable Plan Sections 10 and 12

1.3 Consultation

This Overtrawl Survey Methodology has been developed in consultation with the Scottish Fishermen’s Federation (SFF) as representatives of the local fishing industry. Meetings were held with the SFF between January and March 2021 to discuss the proposed methodology and a draft version of this document was issued to the SFF for review prior to finalisation and submission to MS-LOT.

Other representatives of the local fishing industry were informed by Moray East during the Moray Firth Commercial Fisheries Working Group (CFWG) meeting on 23 February 2021 that the methodology was being drafted and were invited to participate in the development of the methodology if they wished.

This Overtrawl Survey Methodology will be issued for consultation to statutory and relevant non-statutory stakeholders by MS-LOT as part of the approval process.

1.4 Document Structure

The document structure is set out in Table 1-2 below.

Table 1-2 Document Structure

Section		Summary of Contents
1	Introduction and Consent Conditions	Sets out the background, objectives and aims of the Overtrawl Survey Methodology, including the relevant consent condition
2	Statements of Compliance	Sets out the statements of compliance in relation to the Overtrawl Survey Methodology consent condition
3	Defining Requirements for Overtrawl Surveys	Describes the methodology used for determining if and where overtrawl surveys are required
4	Conducting Overtrawl Surveys	Describes the methodology used to conduct overtrawl surveys where they are required
5	Next Steps	Sets out the next steps to be taken following preparation of the Overtrawl Survey Methodology

2 Statements of Compliance

The following statements re-affirm the Moray East commitment to ensuring that the Development is constructed and operated in such a manner as to meet the relevant legislative requirements set out by the OfTI Marine Licence as well as broader legislative requirements.

2.1 Statements of Compliance

Moray East, in undertaking the construction and operation of the Development, will ensure compliance with this Overtrawl Survey Methodology as approved by the Scottish Ministers (and as updated or amended if required).

Where significant updates or amendments to this Overtrawl Survey Methodology are required, Moray East will ensure the Scottish Ministers (and relevant stakeholders) are informed as soon as reasonably practicable and, where necessary, the Overtrawl Survey Methodology will be updated and amended.

Moray East, in undertaking the construction and operation of the Development, will ensure compliance with the limits defined by the original Applications (including the project descriptions defined in the Moray East ES 2012, Modified TI ES 2014 and the Moray East OSP Environmental Report) referred to Part 2 of the OfTI Marine Licence and in so far as they apply to this Overtrawl Survey Methodology (unless otherwise approved in advance by the Scottish Ministers).

2.2 Management of Change to the Overtrawl Survey Methodology

Should there be a reason to significantly modify the methodologies described in this document, such changes will be made to this document and resubmitted. As required by the OfTI Marine Licence conditions, any updates or amendments made by the Licensee, will be submitted, in writing, by the Licensee to the Licensing Authority for their written approval. Minor changes that do not materially alter the methodology or outcome may be undertaken without updating and re-submitting the document; however, any variation would be described in the Overtrawl Survey Report (see Section 4.4).

3 Defining Requirements for Overtrawl Surveys

The OfTI Marine Licence condition 3.2.2.10 requires that the OfTI CaP includes the following:

“Methodologies for over trawl surveys of the cables through the operational life of the Works where mechanical protection of cables laid on the seabed is deployed”

As described above, the OfTI CaP referred this part of the condition in Section 13 of the document by stating that should minimum DoL not be achieved in areas of high fishing intensity and substantial lengths of OEC require mechanical protection, any requirement for overtrawlability surveys and the appropriate methodologies will be discussed with the local fishing industry and agreed with MS-LOT.

Following completion of the OEC installation and burial in February 2021, it was identified that the minimum DoL had been achieved along approximately 92% of the length of the cables and, therefore, no mechanical protection was required along these lengths. However, it was not possible to achieve minimum DoL along approximately 8% of the length of the cables despite repeated passes with the trenching and burial tools; therefore, mechanical protection needed to be deployed in order to achieve minimum DoL.

This section describes the methodology that will be used to determine whether overtrawl surveys are required for any sections of the cable in areas of relevant fishing activity. The methodology for carrying out overtrawl surveys is described in Section 4.

3.1 Definition of Terms

3.1.1 Mechanical Protection

The consent condition requirement for overtrawl survey methodologies applies only where mechanical protection has been deployed for cable protection, and not to sections of cable where mechanical protection has not been deployed.

MS-LOT have confirmed that in this context the definition of mechanical protection means:

“the placement of new materials such as loose rock, rock bags, concrete mattresses or similar in order to protect a cable or structure; either directly through placing on top of a cable/structure or indirectly through placing around a cable/structure in order to prevent scouring or other natural movement of sediment.

Therefore, sections of cables which have been buried to at least the minimum target burial depth defined in the relevant Cable Plan without the use of any rock, rock bags or mattresses shall not be considered to be mechanically protected.

Sections of cables where any rock, rock bags or mattresses have been used to achieve the minimum burial depth or to otherwise protect the cable, shall be considered to be mechanically protected”

Whilst the consent condition only requires overtrawl survey methodologies for cable sections where mechanical protection has been deployed, Moray East recognises that for some types of fishing activity there have been concerns raised regarding the potential for an uneven seabed to be left behind after boulder clearance plough use, cable trenching and burial, even where mechanical protection has not been used.

Some pipeline burial techniques used by the oil and gas industry, such as trenching, towed plough pre-cut and post-lay trenching and backfilling have been reported by the fishing industry to result in the creation of clay berms which can present an increased likelihood of snagging bottom-trawled fishing gear. The techniques used to install and bury the Moray East cables result in less disturbance to the seabed. Whilst Moray East believe that no such berms have been created as a result of cable burial, in recognition of the concerns raised by the fishing industry, a step has been included in the methodology to examine as-built data for sections of the cable route that interact with areas of fishing activity, even where no mechanical protection has been used.

3.1.2 Depth of Lowering

The OfTI CaP defines the minimum required cable burial depth below seabed (referred to as Depth of Lowering (DoL)) that must be achieved, either through burial of the cable, or where that is not possible, with mechanical protection. The minimum allowable DoL for the OECs is 0.7 metres, where this is not achieved mechanical protection to provide equivalent protection has been applied.

The sole exception is the Scottish Hydro Electric Transmission Caithness – Moray cable crossing where the cable is surface laid and protected with 0.5 metres Depth of Cover (DoC), this section is approximately 100m long.

3.1.3 Rock Berm Specifications

Where mechanical protection is used, the OfTI CaP defines the rock berm dimensions as nominally 1 in 3 slopes, 1 metre crest width and a height which varies depending on the DoL of the cable being protected.

Note the height of the rock berm varies depending on the depth of the cable below mean seabed level. The rock grade varies between 1-5 " and 2-8 " along the route with the exception of the 500 m from the HDD exit point which is not expected to be subject to overtrawl trials due to shallow water depth.

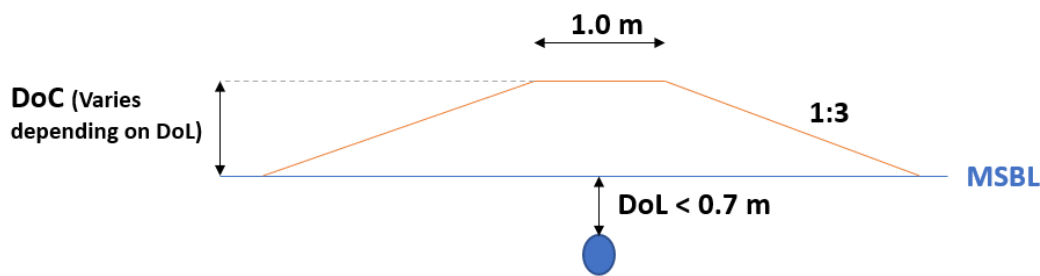


Figure 3-1: Nominal Rock Berm Dimensions

3.2 Methodology Principles

The following key principles have guided the development of this methodology:

- The overall objective is to demonstrate that mechanical protection applied to OECs do not present an increased likelihood of snagging to towed gear fishing activity and to allow discharge of the consent condition;
- The methodology should be data-driven based upon consideration of evidence of fishing activity (location and type), details of the fishing gear employed, cable burial depths, use of mechanical protection and evidence of compliance of mechanical protection with Cable Plan specifications;
- The overtrawl surveys, if identified as being required, should be targeted to specific locations (based on the data-driven principle above) rather than random/untargeted; and
- The overtrawl surveys should be undertaken once, as soon as reasonably practicable following the completion of the installation of mechanical protection. In the event that cables become damaged or exposed, or additional mechanical protection is placed for whatever reason, then the same methodology would be used to determine whether an overtrawl survey of the additional/remedial protection is required.

Moray East will use a decision tree/flow chart that sets out a series of criteria to determine whether overtrawl surveys are required in a particular section of cable.

The flow chart test considers the presence or absence of fishing activity, the presence or absence of mechanical protection, and factors that may increase snagging risk for fishing vessels such as parallel rock berms or the presence of small or low powered vessels.

The OECs will be divided up into sections based upon known areas of fishing activity, to be identified in consultation with representatives of the local fishing industry.

Each section of cable will be subjected to the same flow chart test so that there is a recorded evidence base to show why overtrawl surveys are required, or are not required, for each section of cable. In order for this collaborative approach to be undertaken, those representatives of the local fishing industry participating in the review of the as-built data will be required to sign a non-disclosure agreement with Moray East, due to the confidential nature of the information. Should the SFF or other representatives of the local fishing industry not wish to sign this agreement, Moray East will continue to apply the flow chart test using the same methodology as it otherwise would and propose the identified locations for overtrawl surveys to the SFF for review in advance of undertaking the overtrawl surveys.

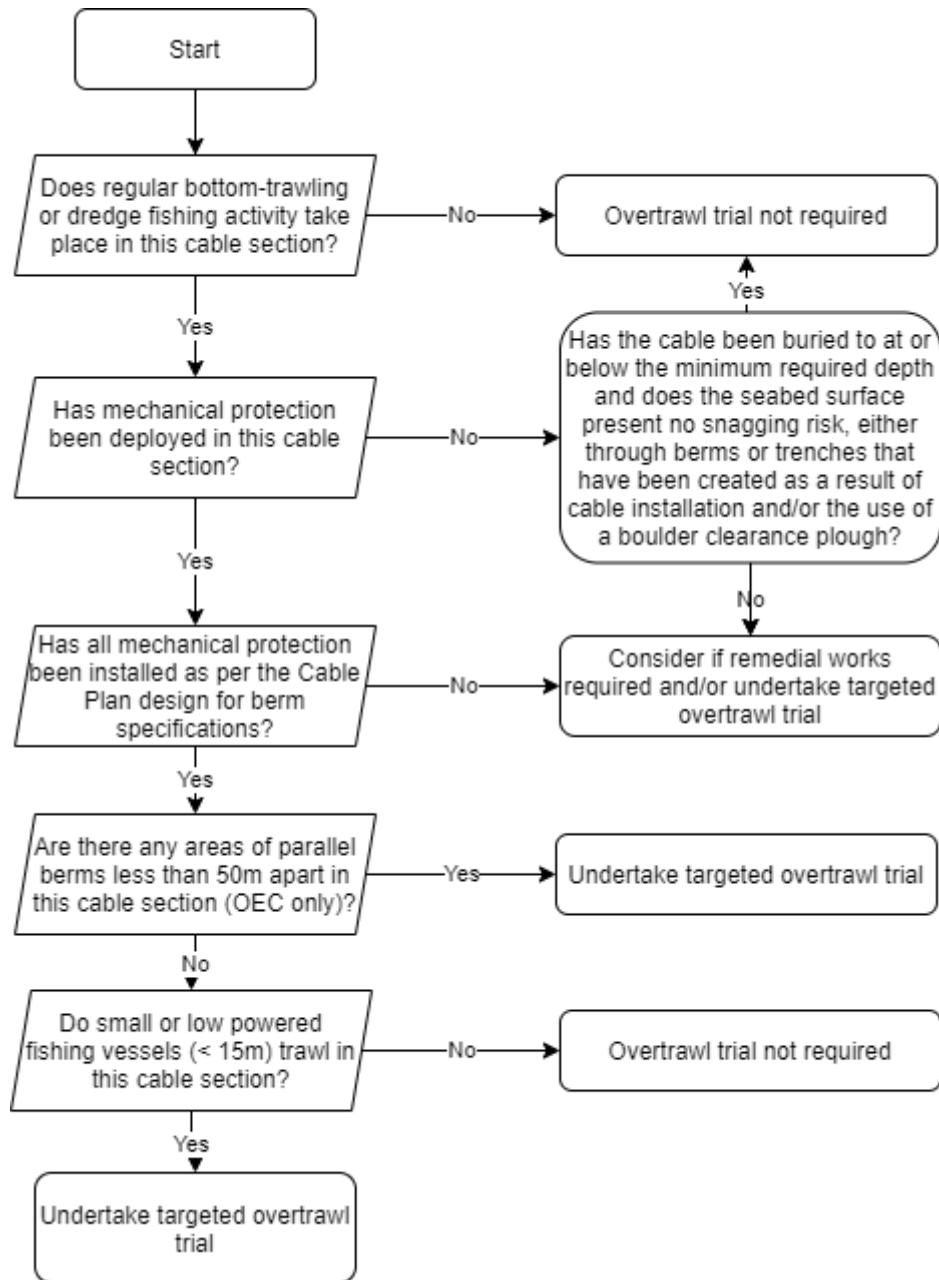
In the event that it is not possible for representatives of the local fishing industry to participate in the review of as-built data, in order to determine the areas of relevant types of fishing activity along the cable route, Moray East will seek advice from the project's Company Fishery Liaison Officer, Brown and May Marine. The identified areas would be shared with representatives of the local fishing industry for review in advance of undertaking the overtrawl surveys.

The crossing point of the OECs with Scottish Hydro Electric Transmission's Caithness – Moray cable shall also be excluded, along with any cables that have not been installed by Moray East.

3.3 Methodology Flowchart

The methodology flowchart used to identify the requirement for overtrawl surveys in each section of the OECs is shown in Figure 3-2 below.

Figure 3-2: Methodology Flowchart



The reasoning behind each of the decision points is briefly described below:

- It is only necessary to consider overtrawl surveys in areas where fishing activity using demersal (bottom-trawled) fishing gear is used (since there is no snagging risk for static gear or non-demersal gear) and these areas will be defined or agreed in consultation with representatives of the local fishing industry.
- Where mechanical protection has not been deployed, providing that the cable has been buried to at least the minimum DoL and that a review of the seabed profile post-cable installation shows that there are no snagging risks (e.g. berms or trenches) that have been created as a result of cable installation and/or the use of a boulder clearance plough, there is no requirement to undertake overtrawl surveys. If snagging risks are identified, then consideration shall be given to undertaking remedial works. For the purposes of this methodology, the determination of whether any berms or trenches are considered potential snagging risks shall take into account the berm material (since berms formed of clay may

present more of a risk than berms formed of sand or silt), size and location relative to areas of demersal fishing activity.

- Where mechanical protection has been used, a review of as-built survey data shall be undertaken to identify any locations where the rock berm dimensions are outside the nominal rock berm specifications shown in Figure 3-1 above. In situations where the representatives of the local fishing industry have signed a non-disclosure agreement, this activity will be undertaken collaboratively, otherwise Moray East will undertake this assessment in conjunction with the project's CFLO. If any such locations are found a decision will be made as to whether the variation is acceptable (e.g. if it is a marginal variation in slope angle or if the berm crest is out of specification by a few centimetres) or whether the berm presents a snagging risk. If a potential snagging risk is identified then either a targeted overtrawl survey will be undertaken at this location or consideration shall be given to undertaking remedial works.
- In some sections of the OECs, mechanical protection may have been used on more than one of the cables where they are parallel to each other. If these rock berms are close to each other (with less than 50m separation between the edges of each berm) this may present a snagging risk to fishing gear, because there may not be enough distance between berms to allow trawl doors to re-stabilise after passing over the first berm before impacting the next berm, potentially resulting in the gear becoming embedded in the berm. Therefore if any sections of parallel rock berms are identified with less than 50m lateral separation between the edges of each berm in an area where demersal fishing activity takes place, a targeted overtrawl survey shall be undertaken at these locations.
- Smaller or low-powered fishing vessels (defined for this purpose as vessels less than 15m in length) may be considered at greater risk of snagging gear because they may not have the engine power required to pull gear over an obstacle that would not present a hazard for a more powerful vessel. Therefore, if any sections of mechanical protection have been used in locations where fishing activity using small or low-powered vessels typically takes place, a targeted overtrawl survey shall be undertaken at these locations.

3.4 Identifying Fishing Activity

As described above, one of the key inputs to the methodology is the identification of areas along the OECs where demersal fishing activity takes place. The methodology also requires the identification of any areas where small or low-powered fishing vessels (< 15m length) carry out demersal fishing activity.

The locations of these areas will be agreed between Moray East and representatives of the local fishing industry using a combination of local knowledge and information gathered by Moray East during the site development process. Moray East's CFLO may assist in the review of this information. If representatives of the local fishing industry do not wish to be involved in this process, Moray East will seek advice from the project's CFLO to determine these areas and the identified areas would be shared with representatives of the local fishing industry for review in advance of undertaking the overtrawl surveys.

The results of the process of identifying these areas shall be presented in map format and referenced to the Kilometre Point (KP) markers used by Moray East to refer to locations on each cable.

3.5 Methodology Outcome

The outcome of the methodology will be presented in map format, showing the overlap of areas of fishing activity (highlighting those areas where small or low-powered vessels operate) with the locations where mechanical protection has been used and any locations with parallel rock berms.

A set of written comments will accompany the map(s) describing why overtrawl surveys are considered to be required or not required in each location.

3.6 Overtrawl Survey Timing and Frequency

Moray East is committed to implementing the methodology described above as soon as reasonably practicable once the information required is available (i.e. once the as-built data is available and information on areas of fishing activity has been collated). This will require the provision of as-built data from the contractor used for OEC installation, which has now been received.

For locations where the methodology identifies that overtrawl surveys are required, it is proposed to undertake the survey once, and if the survey results in a 'pass' (see Section 4.3 for a description of the criteria used to determine pass/fail) then the survey shall not be repeated. If, during the operational life of the cables, a new potential snagging hazard is identified, then the methodology described above shall be used to determine the need for a new overtrawl survey to be undertaken for that location. Factors that may result in a new potential snagging hazard may include events such as cable exposure as a result of hydrodynamic movement of seabed material, requiring the placement of additional mechanical protection.

It is currently expected that following commissioning, the OfTI (of which the OECs are part) will transfer to the ownership of an Offshore Transmission Owner (OFTO) for the Operations & Maintenance (O&M) phase and will, therefore, no longer be owned or operated by Moray East. As part of the transfer process, the OFTO will assume responsibility for compliance with all applicable consents, licences and commitments made in plans produced to discharge conditions on those consents and licences (including this OEC Overtrawl Survey Methodology). Therefore, responsibility for undertaking any overtrawl surveys on the OECs after the OfTI transfer date will lie with the OFTO.

As described in Section 1, a separate Wind Farm Cables Overtrawl Methodology document will be produced which will address methodologies for overtrawl surveys for the IACs and OSP Interconnector Cables. Responsibility for undertaking any overtrawl surveys on those cables will lie with the wind farm operating company.

4 Conducting Overtrawl Surveys

This section outlines the key principles that would be used to define the detailed methods that would be used to conduct overtrawl surveys, should the methodology described in Section 3 identify that overtrawl surveys are required. The following key components of the methods are described in more detail below:

- Selection of vessel and gear type;
- Carrying out the overtrawl survey;
- Criteria for determining pass or fail; and
- Survey reporting.

These methods may be subject to minor modifications during the procurement process of appointing a contractor to produce a detailed method statement and carry out the survey, or during the survey itself. Any such modifications shall be described in the Overtrawl Survey Report (see Section 4.4).

4.1 Selection of Vessel and Gear Type

The type of vessel and fishing gear used to conduct the overtrawl survey shall be representative of the type of fishing vessel and gear used by the local fishing industry in the areas of fishing activity that overlap with the areas of mechanical protection on the OECs. The purpose of this is to try and replicate the normal fishing activity in the area concerned. Depending on the outcome of the methodology described in Section 3, this may mean that overtrawl surveys need to be undertaken with more than one type of vessel or gear.

Based upon Moray East's understanding of the type of fishing activity in the areas where mechanical protection has been used on the OECs, it is anticipated that a local vessel ranging from 15 to 20m in length, with the capabilities to deploy fishing gear in both nephrops and squid target areas, dependent on where the overtrawl was required. The relevant vessel operational and emergency procedures, method statements and project specific risk assessments will be reviewed and approved by Moray East prior to commencement. It is anticipated that a detailed scope of works showing all proposed approach lines and crossing locations, based on fishing activity in the area, will be provided, taking into consideration known seabed features and hazards.

The exact vessel(s) and gear type(s) to be used will be determined during the procurement process to appoint a contractor to carry out the survey and will be described in the Overtrawl Survey Report (see Section 4.4).

4.2 Carrying out the Overtrawl Survey

A detailed method statement shall be produced by the contractor selected to carry out the survey. The bullet points below are intended to provide an indicative method which may be subject to minor change. The Overtrawl Survey Report (see Section 4.4) shall describe the detailed methods used.

- Once the survey has been commissioned, the survey vessel, once mobilised following a pre-start meeting, will transit to site. Upon arrival at the first location, following a detailed toolbox talk, the vessel will mark and assess the overtrawl location using the echo sounder. Once the vessel master is confident the area poses no unexpected risks, the vessel will transit to a location away from the target area to commence deployment of the appropriate fishing gear relevant to the area. This location will be sufficiently distant from the target area to allow the fishing gear to settle and stabilise on the seabed prior to making the first pass.
- The vessel will tow at a speed as used in standard fishing practices relevant to the normal type of fishing activity in the area (e.g. 2.3 – 3.0 knots). As the fishing gear approaches the pass location, all crew will be on standby prepared to engage the hydraulics and commence recovery of the fishing gear if required.

- Once the survey vessel is in a position of 0.25 miles (or 400m) past the targeted crossing position, the vessel's gear will be declared fully clear of the area. It is anticipated that a minimum of two passes will be made at each location.
- Resistance will be determined by changes in tow speed and trawl door spread as the towed gear passes directly over the survey location. The criteria of acceptable resistance is outlined in Section 4.3.
- In an area where there are multiple overtrawl locations in close proximity, the vessel may continue moving from one area to the next without recovering the fishing gear. This method would likely be carried out in an 'S-shaped' pattern that means the gear will pass over the cables at multiple randomly separated locations, with the gear passing over the mechanical protection approximately at right angles to the cable orientation (i.e. if the cable was orientated north-south, the survey would pass over the cable sailing east-west).
- The location of each crossing position shall be recorded, along with the vessel course, vessel speed and (where relevant) trawl door spread.
- If resistance during the pass was below the acceptable agreed level (see Section 4.3), the vessel will slowly turn around 180° and head towards the next location. However, for isolated locations, the vessel may conduct a "teardrop turn" coming back and passing over the area from the opposite direction. Once two passes are made, one in each direction with resistance being below the acceptable levels, the area will be declared a pass.
- Should the resistance be outside the agreed criteria for a clear pass (see Section 4.3) as the fishing gear passes across the location, the vessel master will recover the gear to inspect for rock recovery or gear damage to the trawl net. Once the gear has been assessed, should there have been no damage, the vessel master will attempt to make a further two passes at the area from two different headings to determine if the location is a pass or fail.
- If significant resistance is experienced at a crossing location (i.e. enough resistance to cause the vessel master to abandon the crossing attempt and recover the gear), a second pass may be attempted approaching from the opposite direction, if it is considered that the resistance experienced could be a result of the direction of the tide. If a successful pass is made on the second attempt, the vessel may return later once the tide had changed and attempt the first pass again.

The weather conditions, tidal state and sea state should be included in the vessel's project specific risk assessments to carry out the works as they are relevant control measures in reducing the risk profile. Overtrawl surveys will be conducted during daylight hours, in favourable weather conditions, with a sea state of less than 2.0m, and where possible on a course that is towing into the tide.

In the event that the fishing gear becomes snagged while passing over an area, the vessel will use their normal back up recovery process in an attempt to recover the fishing gear as safely as possible. At no time should excess load be applied where there is a risk of breaking fishing gear. If necessary, the vessel may have to pay out slack and wait for the tide to change direction before attempting recovery again. The position of the gear snag shall be recorded in order to help establish if the gear has caught on a rock berm or other object/seabed feature that is not connected to the installation of the OECs.

Moray East may choose to deploy a client representative onto the survey vessel to monitor the conduct of the survey.

Please note, this method description is not intended to be exhaustive and does not describe the OHSE measures to be implemented which will be set out by Moray East during the procurement process.

4.3 Criteria for Determining Pass or Fail

In order to determine whether the overtrawl survey has established a 'pass' (i.e. the towed fishing gear successfully passed over the identified area) or 'fail' (i.e. locations on the OECs were found that presented

an increased likelihood of snagging) it is necessary to define the criteria that will be used. It is envisaged that following factors will be monitored during the survey:

- Vessel speed: the speed of the vessel shall be closely monitored as the gear passes over the rock berm or above the OECs in order to determine if there is any significant reduction in speed. Whilst a small reduction in speed may be expected and tolerated due to the increased drag of gear passing over the rock berm, a significant reduction in speed (e.g. 50 to 75%) or the vessel being brought to a complete stop may indicate that the gear has snagged on an obstacle and should be investigated.
- Trawl door spread: the separation distance between the trawl doors shall be closely monitored as the gear passes over the rock berm or above the OECs in order to determine if there is any significant destabilisation (which would be indicated by a significant change in the separation distance).
- Large recoveries of loose rock in the cod end section (should this occur, the rock would be examined to determine if it has come from the OEC rock berm (which will be angular rock within a certain size range) or if it is naturally occurring on the seabed in that area (which is more likely to be rounded rock of a greater range of sizes).
- Significant damage to the net caused by a collection/build-up of rock breaking free from the bottom sheet netting or cod end (should this occur, if practicable the rock would be examined to determine if it has come from the OEC rock berm or if it is naturally occurring on the seabed in that area).
- Post-trial survey: consideration may be given to the use of a Remotely Operated Vehicle (ROV) or small camera attached to the fishing gear to continuously monitor the progress of the survey and to detect any impact or the as-left conditions of the mechanical protection.

4.4 Survey Reporting

An Overtrawl Survey Report shall be produced following completion of the survey. This shall include:

- the dates on which the survey was undertaken;
- the vessel(s) and type(s) of gear used;
- the weather conditions, tidal state and sea state during the survey;
- plotter shots showing each crossing location and the vessel's tracks on approach and at the point of crossing;
- a detailed record of the vessel's course, speed and door spread throughout the overtrawl survey, with particular attention on approach to the OEC, during the pass over the OEC and the changes in any of these noticed during the pass;
- a detailed description of any snagging events, including photographs of gear damage, vessel's track from the plotter and the action taken; and
- a statement clearly describing whether any locations were identified that may present an increased likelihood of snagging to towed gear fishing activity over the OECs.

Should any locations be identified which have 'failed' the overtrawl survey (i.e. may present an increased likelihood of snagging to towed gear fishing activity) the survey results shall be discussed with the survey contractor and representatives of the local fishing industry in order to identify the action required in order to address the risk.

Should any locations be identified where multiple attempts were made from several approaches (causing the vessel master to deem that area as a 'failed' crossing), at the end of the overtrawl survey the locations of any 'failed' areas would be issued on a Notice to Mariners until further investigations were undertaken.

A separate survey vessel may be employed to complete a multibeam or ROV survey of any areas which have been identified as 'failed'.

Once the report has been reviewed and agreed between the survey contractor and Moray East, a copy of the report shall be submitted to MS-LOT and be made available to the local fishing industry on request via Moray East's Company FLO.

5 Next Steps

This OEC Overtrawl Survey Methodology document has been submitted to MS-LOT for approval to partially address the requirement of condition 3.2.2.10(f) attached to the OfTI Marine Licence.

Once approval has been received, the methodology will be implemented as outlined above (which as described, may be subject to minor change through the procurement process or by the survey contractor), the requirement for overtrawl surveys identified and surveys carried out as required.

Following completion of the overtrawl surveys, an Overtrawl Survey Report will be produced and issued no later than three months following the completion of the Overtrawl Survey. Should the overtrawl surveys identify any areas of concern, options to address these will be discussed with the local fishing industry and MS-LOT.




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