

Marine Licence Application for Construction Projects

Havfrue Cable System

Attachment J: Gap Analysis

This gap analysis has been undertaken in line with the requirement in the Scoping Opinion for the Havfrue Cable Project from Marine Scotland, dated 27th August 2018. It provides an overview of the concerns raised by the statutory consultees and how these have been addressed by the licence applicant.

Table 1.1: Havfrue Marine Licence Application: Gap Analysis

Consultee	Summary of response (key concern)	Response from Applicant	Action Required	Evidence sent to MS LOT
Scottish Natural Heritage (SNH)	No concerns as long as no sonar survey be undertaken.	None	None	Attachment C: Environmental Assessment, Noise section
Scottish Fishermen's Federation (SFF)	No consideration of mattressing/rock dumping in scoping report.	Rock installation will be considered within the Environmental Assessment. Mattressing has been eliminated as a cable protection alternative.	Include rock installation in the Environmental Assessment for the Project.	Attachment C: Environmental Assessment
Scottish Environmental Protection Agency (SEPA)	No concerns as long as cable does not make landfall.	None	None	None
Royal Yachting Association Scotland	No concerns as cable laying is covered by international regulation.	None	None	None
Orkney Fisheries	Cable very likely to cross trawled fishing grounds. Expects to be consulted and informed of all stages and design elements of the Project.	Consultation is ongoing with fisheries representatives, including Orkney Fisheries. The Project was instructed by fishermen to consult SFF as the primary representative of	Ongoing consultation with the SFF, including the Orkney Fisheries Association	Attachment E -Copies of Correspondence with Consultees

		fishing groups, including Orkney Fisheries.		
Northern Lighthouse Board	<ul style="list-style-type: none"> • Developer to issue Marine Safety Notices during installation • Submission of 'as laid' plan to UK Hydrographic Office 	<ul style="list-style-type: none"> • The Applicant will follow notification procedures as set out in the Communication Strategy. • After installation, 'as laid' coordinates will be submitted to the UK Hydrographic Office 	<ul style="list-style-type: none"> • The Applicant will issue a communication strategy before the work starts. Document will be updated during installation activities as necessary. • Submission of 'as laid' RPL to UK Hydrographic Office 	<ul style="list-style-type: none"> • Attachment G - Communication Strategy
Maritime and Coastguard Agency (MCA)	<ul style="list-style-type: none"> • Work to take place in high traffic areas • Concerns work will encroach on recognised anchorages • Impact on electromagnetic deviations on ship's compasses • Subject to the results of the Burial Protection Index study an anchor 	<ul style="list-style-type: none"> • Applicant will produce a navigational risk assessment and burial risk assessment as part of the application package covering the items identified by MCA. • Applicant to provide information on likely effects of electromagnetic deviations 	<ul style="list-style-type: none"> • Include a Navigation and Shipping section into Environmental Assessment • Issue a Navigational Risk Assessment • Issue a Burial Risk Assessment 	<ul style="list-style-type: none"> • Attachment C - Navigation and Shipping section • Attachment D - Navigational Risk Assessment • Attachment H - Burial Risk Assessment

	penetration study may be necessary.			
Joint Nature Conservation Council (JNCC)	<ul style="list-style-type: none"> • Full worst-case scenario was not considered (full width of plough, disturbance from grapnel or post-lay operation, protection material) • Possible impact on other habitats of nature conservation interest affected by proposed operation 	<p>Full width of the plough and grapnel to be taken into consideration in the Environmental Assessment.</p> <p>Impacts from licensable activities and on designated sites considered in the EA.</p>	Consideration of requested topics in the EA where feasible	<ul style="list-style-type: none"> • Attachment C - Environmental Assessment
Historic Environment Scotland	None	None	None	None
Defence Infrastructure Organisation	Planned cable route falls within MOD Danger Area D701	The Applicant has consulted with MOD and received agreement that the proposed route is acceptable. Applicant to provide a deconfliction strategy.	<ul style="list-style-type: none"> • Meeting with MOD to discuss route and installation method. • Development of deconfliction strategy prior to start of installation. 	<ul style="list-style-type: none"> • Attachment E - Correspondence (Evidence of agreement with MOD)