Marine Scotland Science

MacFarlane M (Marc)

From: Wright K (Kirsty)
Sent: 08 June 2020 16:18
To: Irvine S (Sophia)
Cc: MSS Advice; Edwards E (Ewan)
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sophia,

Please find below comments to the above consultation with regards to Commercial Fisheries.

MSS has reviewed the Neart na Gaoithe Offshore Wind Farm Cable Plan (Revision 4.0 May 2020) and provide the following comments with regards to Commercial Fisheries.

MSS notes that the EMF study carried out estimates that in the case of the inter-array and interconnector cables, EMF generated will reduce to zero within 0.25 m of the cable when it is carrying the maximum current of 459 Amp (A) and 923 A respectively. In addition, the study estimates that for both the inter-array and interconnector cables the EMF reduces down to 0 mT before it reaches the seabed surface. In the case of the export cable, EMF generated will reduce to zero within 5 m of the cables when it is carrying the maximum current of 599 A. For all types of cables, the predicted maximum magnetic field strength of the export cables at the seabed is expected to be lower than the earth's magnetic field. If this is the case, the potential for EMF effects on benthic and fish species at the seabed surface is likely to be negligible.

The EMF study is an interesting and useful study, although for future reference, it would be useful if the units of measurement were kept the same for consistency and ease of comparison. The maximum generated EMF is reported in millitesla for the inter array and interconnector cables and microtesla for the export cables.

MSS notes that it is the intention to bury the cable to a target depth of 1 meter along the majority of the cable and where this is not possible, cable protection measures such as rock placement/dumping and concrete mattresses will be used. Nylon bags of gravel, hardened sand-cement grout or concrete are also considered as potential cable protection measures. MSS also note the proposal to re-route the export cable to the west of the rock outcrop to enable burial at KP 9.

The cable laying process mentions boulder clearance. MSS recommends that the developer makes it clear if the intention is to re-locate these boulders or if it is to take them onboard for onshore disposal. If the boulders are to be re-located and they are considered to be of a size that may cause a hazard to bottom-contact fishing operations then MSS recommends that information is provided to MS-LOT and fishing organisations on the new location of the boulders and an estimate of their size.

Lastly MSS note that the developer committed to undertake over-trawl investigations on all cable types and that they envisage these could take the form of three-dimensional modelling. MSS assumes this modelling will take place pre-cable laying and that the outputs of the model will be used to help guide the cable protection measures to minimise risks for commercial fishing.

Kind regards,
Kirsty

Kirsty Wright
Fish and Fisheries Advisor
Renewable Energy Environmental Advice Group

marinescotlandscience
Scottish Government
Marine Laboratory | 375 Victoria Road | Aberdeen, AB11 9DB
Phone: Currently working from home – please contact me via email
[Redacted]

From: Irvine S (Sophia) <[Redacted] >
Sent: 11 May 2020 08:08
To: MARINEENERGY <MARINEENERGY@nature.scot>; 'navigationsafety@mcga.gov.uk' <navigationsafety@mcga.gov.uk>; 'renewables@sff.co.uk' <renewables@sff.co.uk>
Cc: Karen Taylor [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Neart na Gaoithe Offshore Wind Limited (NnGOWL), having received consent under the above legislation, has submitted to Marine Scotland Licensing Operations Team (MS-LOT) a Cable Plan in order to satisfy condition 19 of the Section 36 consent (as varied), condition 3.2.2.9 of the Offshore Generating Station marine licence (06677/19/0) and condition 3.2.2.8 of the Offshore Transmission Works marine licence (06678/19/1).

The marine licences, section 36, decision notices and conditions, as well as other relevant documents can be found on our website, following the link: http://marine.gov.scot/ml/neart-na-gaoithe-offshore-windfarm-revised-design

MS-LOT would appreciate any comments you may have on the proposed Cable Plan in order to determine whether it is fit for purpose for the Scottish Ministers approval.

If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

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Maritime and Coastguard Agency
(First Response)

MacFarlane M (Marc)

From: Helen Croxson[Redacted]
Sent: 08 June 2020 10:55
To: Irvine S (Sophia); MS Marine Renewables
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Follow Up Flag: Follow up
Flag Status: Flagged

Sophia,

Thank you for the opportunity to comment on the Cable Plan for the Neart na Gaoithe Offshore Wind Farm. The MCA has considered the document and has no concerns to raise on this occasion. We would however like to comment as follows:

We note in section *6.3 Cable Burial and Protection* that all cables will be buried to at least 1m. However, where this is not feasible in certain locations, cable protection may be used along sections of the cable.

It should be noted in this section that any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum but under no circumstances should depth reductions compromise safe navigation. We would expect the project to discuss any location where they are likely to exceed 5%, and the potential impact of safe navigation, with the MCA. This requirement as listed in the consent condition section (table 1-1) of the plan, should be included here.

We would also expect all maritime safety legislation to be adhered to during the operation.

Kind regards

Helen

Maritime & Coastguard Agency

Helen Croxson, Offshore Renewables Advisor
Navigation Safety Branch, Bay 2/25
Maritime & Coastguard Agency
Spring Place, 105 Commercial Road, Southampton, SO15 1EG
Tel: 0203 8172426
Mobile: [Redacted]
Email: [Redacted]

Please note I currently work Tuesdays, Wednesdays and Thursdays.

From: [Redacted] [Redacted]
Sent: 11 May 2020 08:08
To: MARINEENERGY@nature.scot; navigation safety <navigationsafety@mcga.gov.uk>; renewables@sff.co.uk
Cc: [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

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The marine licences, section 36, decision notices and conditions, as well as other relevant documents can be found on our website, following the link: http://marine.gov.scot/ml/neart-na-gaoithe-offshore-windfarm-revised-design

MS-LOT would appreciate any comments you may have on the proposed Cable Plan in order to determine whether it is fit for purpose for the Scottish Ministers approval.

If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

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Maritime and Coastguard Agency
(Second Response)

MacFarlane M (Marc)

From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 09 June 2020 14:54
To: Irvine S (Sophia); MS Marine Renewables
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sophia,

My comments on the NNG cable plan are as follows:

1. The Licencee must issue local notification to marine users - including fisherman's organisations, neighbouring port authorities and other local stakeholders - to ensure that they are made fully aware of the activity.
2. The Licencee must ensure that HM Coastguard, in this case nmoccontroller@hmcg.gov.uk, The National Maritime Operations Centre is made aware of the works prior to commencement.
3. The Licencee must notify the UK Hydrographic Office to permit the promulgation of maritime safety information and updating of nautical charts and publications through the national Notice to Mariners system.
4. Any consented cable/pipeline protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum but under no circumstances should depth reductions compromise safe navigation.
5. Any jack up barges / vessels utilised during the works/laying of the cable, when jacked up, should exhibit signals in accordance with the UK Standard Marking Schedule for Offshore Installations.

Best regards

Nick

Maritime & Coastguard Agency

Nick Salter
Navigation Safety Advisor | Navigation Safety Branch
Maritime & Coastguard Agency | c/o Falmouth Marine Office
Pendennis Point | Castle Drive | Falmouth | Cornwall | TR11 4WZ
Tel: +44 (0)20 3817 2554 | Mob: [Redacted]
Email: [Redacted]

Safer Lives, Safer Ships, Cleaner Seas

From: [Redacted]
Sent: 11 May 2020 08:08
To: MARINEENERGY@nature.scot; navigation safety <navigationsafety@mcga.gov.uk>; renewables@sff.co.uk
Cc: [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

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The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

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MS-LOT would appreciate any comments you may have on the proposed Cable Plan in order to determine whether it is fit for purpose for the Scottish Ministers approval.

If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

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North and East Coast Regional Inshore Fisheries Group

MacFarlane M (Marc)

From: [Redacted]
Sent: 08 June 2020 19:33
To: MS Marine Renewables
Subject: Neart na Gaoithe Windfarm Cable Consultation
Attachments: Windfarm cables.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please find attached a response to the above consultation.

Kindest regards

Jennifer Mouat

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Dear Sir /Madam

Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation

Thank you for the opportunity to respond to the above consultation. I am writing as Chair of the North & East Coast Regional Inshore Fishery Group (NECRIFG). Having consulted with members of NECRIFG I have summarised below the points which have been made on the Cable Plan for the Neart na Gaoithe Windfarm.

Table 4.1

Table 4.1 lists the 13 surveys that have taken place to inform the cable planning process, however, para 16 states that new survey data may change the outcomes. It is important to have certainty of the route to allow comment, it seems this is not the case.

Para 4.3.2

The Benthic surveys are fairly comprehensive, however, there is no comment on commercial fish species, which is a worrying omission and one that needs to be amended.

Para 4.4.2.29

Para 4.4.2.29 clearly identifies 3 points for the export cable; @1.25km, 3km and 9km where the ability to bury has not been confirmed, so the plan is lacking in clarity. Indeed 4.5.2.1.35 states the route is still subject to refinement. This lack of clarity makes is very difficult to comment with any certainty.

Para 4.5.1 and figure 4.1

it is only clear that there will be 96km of cable "installed on the sea-bed". There are 9 separate inter-array loops on the boundary of the farm, which if not buried will form a barrier to mobile gears. Further-more the internal loops if not buried will preclude mobile fisheries inside the farm. Since the windfarm was licenced on the premise of "Fishing may continue post installation" this poses a serious issue.

Chapter 5

The plan speaks of "modelling" and a "desk top study" of the Electro-Magnetic Force produced by any of the cables being minimal. We would suggest a consent condition obliging the developer to monitor in real time to genuinely understand if here are any significant EMF impacts.

Chapter 6

With regard to cable burial, point 2 describes the process of the CBRA, done by external consultants, informed by the 13 surveys (noted above in Table 4.1) which are not conclusive about the realistic attainment of burial. To further info this I would suggest that active fishermen are consulted to further inform this work as well as her issue of gear penetration..

The plan has no clarity on burial/non-burial, as the Depth of Lowering is so important to fishing resuming. If we were to assume 1m DoL on all cables, that would be reassuring that fishing may

continue, but if 1m is not achieved we would expect the developer to consult on the materials, as Bags and Mattresses can be safety hazards in their own right. For instance in 6.3.2.85 the shore end is described as bed rock, so we would recommend rock dump or ducting as adequate protection.

Chapter 7

With regard to cable installation methods burial is almost always the preferred option. Timing of the work should also consider local fishing patterns and try to avoid disruption.

Paras 91, 109 and 136

The above paras all speak of the cable being surface laid, for this a Guard vessel should be used when development vessels are away from the site. In paras 113 and 140 (and in 6.78 and 83, also 8.3) there seems to be a direction towards bags and mattresses.

It is recommended that best practice is considered and post lay surveys are conducted and this information readily available to all stakeholders. Experience has led us to believe the only true way to prove its safe for fishing to continue is over trawl surveys as side scan surveys don't relate to what actually fishermen encounter. Modelling and desk top studies are very limited in scope compared to fishers' experience, so a proper engagement with an industry advisor would seem to be the best way forward. It will be important to ensure that appropriate vessels in terms of size and gear are used for this process.

Para 8.4

With regard to cable failure, we believe that the majority of damage to cables occurs during the installation process. This should mean that the timing of the work is crucial and as previously mentioned fishing industry engagement will be crucial to understand who uses this route and to compensate them for avoidance of the area.

General Observation

It is felt that any company who is awarded the construction contract should be bound by the conditions of any consent ensuring that any breaches result in a halt to on site work. This includes the scenario where the cable route has to be altered which should result in a further consultation and consent.

Kindest regards

Jennifer Mouat
Chair NECRIFG

Red Rock Power

MacFarlane M (Marc)

From: Ben King [Redacted]
Sent: 02 June 2020 09:52
To: MS Marine Renewables
Cc: Irvine S (Sophia); Wilson J (Jessica); Claire Gilchrist
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Follow Up Flag: Follow up
Flag Status: Flagged

Dear MS-LOT,

Thank you for the opportunity to consult on Neart na Gaoithe Offshore Wind Farm's Cable Plan. I can confirm that we have reviewed the plan and do not have any comments we wish to raise.

Kind regards,
Ben

Ben King
Offshore Consents Manager

SDIC Red Rock Power Limited

5th floor, 40 Princes Street
Edinburgh EH2 2BY
United Kingdom
Tel: +44 (0) 1315577101
Mobile: [Redacted]
Email: [Redacted]

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 01 June 2020 09:01
To: MS.MarineRenewables@gov.scot
Cc: [Redacted]
Subject: FW: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

Please note that the consultation period for the email below closes in one week. If you have not replied yet, and intend to submit a response, please do so before 08 June 2020.

Kind regards,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: http://www.gov.scot/Topics/marine/Licensing/marine



From: Irvine S (Sophia)
Sent: 11 May 2020 08:08
To: MARINEENERGY <MARINEENERGY@nature.scot>; 'navigationsafety@mcga.gov.uk' <navigationsafety@mcga.gov.uk>; 'renewables@sff.co.uk' <renewables@sff.co.uk>
Cc: [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

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If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

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Scottish Fishermen’s Federation

MacFarlane M (Marc)

From: Malcolm Morrison [Redacted]
Sent: 04 June 2020 19:05
To: Irvine S (Sophia); MS Marine Renewables
Cc: Claire Gilchrist; Elspeth Macdonald
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020
Attachments: 202004514 NnG Cable Response_Final.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Sophia
Enclosed is the SFF response to the NnG cable plan,
Best, Malcolm

From: [Redacted] [Redacted]
Sent: 11 May 2020 08:08
To: MARINEENERGY@nature.scot; navigationsafety@mcga.gov.uk; Renewables <Renewables@sff.co.uk>
Cc: [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

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If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

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SCOTTISH FISHERMEN'S FEDERATION

Our Ref: MM/

Your Ref:

27 April 2020

E-mail
E-mail: ms.marinerenewables@gov.scot

Scottish Fishermen's Federation
24 Rubislaw Terrace
Aberdeen, AB10 1XE
Scotland UK

T: +44 (0) 1224 646944
F: +44 (0) 1224 647058
E: sff@sff.co.uk

www.sff.co.uk

Dear Sirs

Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation

The Scottish Fishermen's Federation (SFF), on behalf of the 400 plus vessels in membership of its 8 constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association is pleased to comment on the proposed cable plan for the Neart na Gaoithe windfarm.

The SFF wish to object to this plan, as we don't believe sufficient consideration has been given to the possible impacts on fishing. These are listed below and the SFF would expect that these concerns are addressed before the plan is accepted.

Table 4.1 lists the 13 surveys that have taken place to inform the cable planning process, yet para 16 states that new survey data may change the outcomes, so there is uncertainty about the route even in the plan. Meaningful engagement with the fishing industry could have helped the development with data to remove the uncertainty.

Para 4.3.2 on Benthic surveys has a lot of interesting data, and would lead the SFF to think that some of these areas should be cited for protection because of the plethora of relevant substrate habitats and species. The plan however pays no attention what so ever to commercial fish species, the SFF would therefore object to this lack, particularly as para 27 gives weight to the claim that there are no habitats identified that would influence routes or installation methods. During discussions with the developer, the SFF has notified them multiple times about the rich fishing grounds housing crab, lobster, nephrops and scallops.

Regarding the export cable, 4.4.2.29 clearly identifies 3 points; @1.25km, 3km and 9km where the ability to bury has not been confirmed, so the plan is lacking in clarity. Indeed 4.5.2.1.35 states the route is still subject to refinement. As the protection of the cable will impact the fishing industry the most, we seek clarification before agreeing with any plans.

Moving to the inter-array cables Para 4.5.1 and figure 4.1 it is only clear that there will be 96km of cable "installed on the sea-bed". There are 9 separate inter-array loops on the boundary of the farm, which if not buried will form a barrier to mobile gears. Further-more the internal loops if not buried will preclude mobile fisheries inside the farm. Since the windfarm was licenced on the premise of "Fishing may continue post installation" these are serious issues.

Regarding chapter 5, the plan speaks of "modelling" and a "desk top study" of the Electro-Magnetic Force produced by any of the cables being minimal. Since there is a dearth of research on this subject, and it is important to get it right, the SFF would seek a consent condition obliging the developer to monitor in real time to. verify the modelling outputs in order to give some credibility to the conclusions.
Chapter 6, Cable Burial, point 2 describes the process of the CBRA, done by external consultants, informed by the 13 surveys (noted above in Table 4.1) which are not conclusive about the realistic attainment of burial. The SFF would have suggested that this could have been ground truthed by consulting a fisherman with some knowledge of the area. The use of AIS is not considered as a reliable indicator of activity by the fishing sector and we would ask NnG to extend their knowledge of fishing data. The CBRA outputs would have also benefited from ground truthing with fishermen over the conclusions reached on gear penetration.

Then it considers the ground conditions, and notes "rock at/near seabed surface in some locations" within the windfarm and bedrock exposed at either extremity of the export cable. Which would suggest that fishing is limited, but it is unlikely to achieve burial in many places. This is reflected in 6.3.76 which states that protection can be up to the licenced limit of 36.8km.

Again the SFF would object to the plan having no clarity on burial/non-burial, as the Depth of Lowering is so important to fishing resuming. If we were to assume 1m DoL on all cables, that would be reassuring that fishing may continue, but if 1m is not achieved the SFF would expect the developer to consult on the materials, as Bags and Mattresses can be safety hazards in their own right. For instance in 6.3.2.85 the shore end is described as bed rock, so the SFF would recommend rock dump or ducting as adequate protection.

The SFF welcomes the expression of optimism in 6.3.2.86, that the developer is open to rerouting to ensure burial even to outside the original consented corridor. It is unfortunate that after 13 surveys, and many offers of help from fishermen, that there is still this lack of clarity on the route. The SFF would expect that if burial is the issue there should be no barriers to stop that happening.

Chapter 7, Cable installation methods, in general the SFF attributes the same response to all the different categories, export, inter array and inter OSP, burial always being the preferred option. Paras 91, 109 and 136 all speak of the cable being surface laid. The SFF would expect to see a Guard Vessel in situ for any period where development vessels are away from the site. In paras 113 and 140 (and in 6.78 and 83, also 8.3) there seems to be a direction towards bags and mattresses which, in terms of safety are not SFF preferred methods. SFF advisors are always happy to help analyse the best method for each area.

The SFF would hope to see a consent condition enforcing timeous post lay surveys and sharing of such data with the fishing industry, in order to establish the need for over trawl studies, which are discussed in 115, 116 and 140 through 143. We would expect the overtrawl surveys to have a deadline as a consent condition to ensure fishing may continue at the soonest. Experience has led the SFF to believe the only true way to prove its safe for fishing to continue is over trawl surveys as

side scan surveys don't relate to what actually fishermen encounter, clay berms being a particular problem. Modelling and desk top studies are very limited in scope compared to fishers experience, so a proper engagement with an industry advisor would seem to be the best way forward.

Yours faithfully **Malcolm Morrison,** Fisheries Policy Officer

Scottish Natural Heritage

MacFarlane M (Marc)

From: Karen Taylor [Redacted]
Sent: 26 May 2020 17:08
To: MS Marine Renewables
Cc: Irvine S (Sophia)
Subject: RE: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sophia,

Thank you for requesting our advice on the Cable Plan (CaP) submitted by NnGOWL as part of the Neart na Gaoithe offshore wind Farm consent plan requirements. We have reviewed the document (document reference: NNG-NNG-ECF-PLN-0007) and consider it to be fit for purpose. Please find below our comments on this plan:

1. Section 5 outlines the assessment of magnetic field magnitudes from the array, interconnector and export cables at burial depth of 1.0m concluding that maximum predicted field strength is predicted to be lower than the earth's magnetic field. As such significant impacts on fish or benthic interests are therefore unlikely.
2. We note from Section 6 that while a cable burial risk assessment (CBRA) has been undertaken to help determine appropriate depth of lowering (DoL) and identify any threats, that the results of the assessment remain indicative pending analysis of recently gathered additional seabed survey data, particularly in relation to sediment mobility along the Export Cable Corridor. We understand however that this is considered a secondary threat and that the target depth of 1.0m burial is considered sufficient to adequately mitigate the risk of cable strikes.
3. Burial to DoL is expected to be achieved along the majority of the cable routes with potential for rock protection on some sections of the export cables due to ground conditions - particularly in relation to the area at KP9 as described in paragraph 86, which may require re-routing or an alternative solution to rock protection. If DoL has not been achieved alternative burial tools and protection measures will be considered as indicated in paragraphs 113 and 140.
4. Rock placement is also likely to be required as part of the close fitting cable protection system at cable end where cables leave the seabed to enter the jacket J-tubes.
5. In the event of cable exposure a number of measures will be considered as remedial action, as described in paragraph 148, which include placement of rock bags or alternatives such as frond mats, tyre mats etc. Consideration should be given to the materials used should any such alternatives be necessary in order to minimise environmental impact from such materials.
6. We request that full records are kept of all materials that are used and in which locations to assist with decommissioning plans in the future.

I trust this is of assistance,
Best wishes,
Karen

****Please note I am working from home as a result of the covid-19 pandemic - my office phone has been diverted to my work mobile. I have access to emails and can attend virtual meetings. I'm mostly working my usual days****

Karen Taylor | **Marine Sustainability Adviser**
Scottish Natural Heritage | 1 Kilmory Industrial Estate | Kilmory | Lochgilphead | Argyll | PA31 8RR | **t:** 0131 316 2693 **m:**[Redacted]
Dualchas Nàdair na h-Alba | 1 Raon Gnìomhachais Chille Mhoire | Cille Mhoire | Ceann Loch Gilb | Earra-Ghàidheal | PA31 8RR

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Please note that I work part-time: Monday, Tuesday and Thursday. If you need an immediate response outwith these days please forward to: marineenergy@nature.scot

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From: [Redacted]
Sent: 11 May 2020 08:08
To: MARINEENERGY <MARINEENERGY@nature.scot>; navigationsafety@mcga.gov.uk; renewables@sff.co.uk
Cc: [Redacted]

Subject: Neart na Gaoithe Offshore Wind Farm - Cable Plan Consultation - Response required by 8 June 2020

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Neart na Gaoithe Offshore Wind Limited (NnGOWL), having received consent under the above legislation, has submitted to Marine Scotland Licensing Operations Team (MS-LOT) a Cable Plan in order to satisfy condition 19 of the Section 36 consent (as varied), condition 3.2.2.9 of the Offshore Generating Station marine licence (06677/19/0) and condition 3.2.2.8 of the Offshore Transmission Works marine licence (06678/19/1).

The marine licences, section 36, decision notices and conditions, as well as other relevant documents can be found on our website, following the link: http://marine.gov.scot/ml/neart-na-gaoithe-offshore-windfarm-revised-design

MS-LOT would appreciate any comments you may have on the proposed Cable Plan in order to determine whether it is fit for purpose for the Scottish Ministers approval.

If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before the **8th June 2020**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia

Sophia Irvine
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Email: [Redacted]
Website: https://www2.gov.scot/Topics/marine/Licensing/marine

COVID-19: Marine Scotland - Licensing Operations Team (LOT) is working from home and unable to respond to phone enquiries. Please communicate with LOT via email. Email addresses are MS.MarineRenewables@gov.scot for marine renewables correspondence or MS.MarineLicensing@gov.scot for all licensing queries.

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Thoiribh an aire airson adhbharan gnothaich, ‘s dòcha gun tèid sùil a chumail air puist-dealain a’ tighinn a-steach agus a’ dol a-mach bho SNH.

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