

Redacted

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**From:** Redacted  
**Sent:** 12 March 2019 09:57  
**To:** Redacted  
**Subject:** RE: Moray East - OfTI Cable Plan (CaP) Consultation - by 11/03/2019

Redacted

Many thanks for the opportunity to comment on the above Cable Plan consultation.

We have no significant concerns to raise with regards to the cable plan. We would however like to highlight that any consented cable protection works must ensure existing and future safe navigation is not compromised, accepting a maximum of 5% reduction in surrounding depth referenced to Chart Datum.

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

Kind regards

Redacted



Redacted **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.

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**From:** Redacted  
**Sent:** 11 February 2019 16:33  
**To:** Redacted

**Subject:** Moray East - OfTI Cable Plan (CaP) Consultation - by 11/03/2019

**ELECTRICITY ACT 1989**

*The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)*

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

*The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)*  
*The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)*

Dear Sir/Madam,

Moray Offshore Windfarm (East) Limited (“Moray East”), on behalf of Telford Windfarm Limited, Stevenson Windfarm Limited and MacColl Windfarm Limited, having received consent under the above legislation have submitted to the Licensing Authority the documents attached.

Please find attached the proposed post-consent Offshore Transmission Infrastructure (“OfTI”) Cable Plan (“CaP”) and covering letter addressed to Marine Scotland Licensing Operations Team (“MS-LOT”) from Moray East. The purpose of the OfTI CaP is to satisfy the requirements of the following consent conditions:

- Condition 3.2.2.10 of the OfTI Marine Licence (licence number: 05340/14/0)

The Decision Letters and Conditions, as well as other relevant documents, can be found on our website, using the following link:

<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Moray3>

The conditions state that the plan is to be submitted to the Scottish Ministers for their written approval, following consultation with Scottish Natural Heritage (“SNH”), the Maritime and Coastguard Agency (“MCA”) and the Scottish Fisherman’s Federation (“SFF”) and any such other advisors or organisations as may be required at the discretion of the Scottish Ministers.

We would appreciate any comments you may have on the attached documents, in order to determine whether it is fit for purpose for the Scottish Ministers to give it their written approval. Please note that we do not seek comments on the section 36 Consents nor the Marine Licences, which will not be amended.

If you wish to submit any comments, please do so to [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot) before the **11<sup>th</sup> March 2019**.

I would appreciate if you could acknowledge receipt of this email.

Yours faithfully,

**Redacted** | Marine Renewables Casework Officer  
Marine Scotland Licensing Operations Team | [marinescotland](http://www.marinescotland.gov.scot)  
Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB  
Tel: **Redacted**  
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Dh’fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh’fhaodadh nach eil beachdan anns a’ phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Our Ref: MM/dr -19-06

Your Ref:

4<sup>th</sup> March 2019

E-mail: **Redacted**

E-mail: [ms.marinerenewables@gov.scot](mailto: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](mailto:sff@sff.co.uk)

[www.sff.co.uk](http://www.sff.co.uk)

Dear Sirs

### **MORAY EAST – OFTI CAP CONSULTATION**

The Scottish Fishermen's Federation, 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 from the Moray East Development.

Our first comment would be that in the spirit of Scotland's National Marine Plan, the developers could have more fully engaged with relevant fishers at the very beginning of the cable design process to get an understanding of seabed conditions and constraints from the traditional users of the area. Fishermen's knowledge would be invaluable in that respect.

All other comments in the following can be related to various policies in the SNMP.

Para 7.2.4 referring to protection of OSP end of the OEC should ensure that any deposits used are within the 50m zone. If not mitigation is required.

Para 8.1.2.1 suggests that there are rock outcrops which one would assume would make burial impossible, with only 0.5 of Holocene sand to provide cover, which both creates a safety hazard and denies fishing access, so must be mitigated.

Para 9.3 shows that there is a likelihood of a 1.2km wide route being impacted from the development to the shore. If this means fishing is impossible mitigation is required.

Para 9.4 referring to habitats, indicating that at least 2 areas could be identified as those needing protection. Should this be the case the cable should not go through them, and any impact on fisheries must be mitigated.

Members:

Anglo Scottish Fishermen's Association · Fife Fishermen's Association · Fishing Vessel Agents & Owners Association (Scotland) Ltd ·  
Mallaig & North-West Fishermen's Association Ltd · Orkney Fisheries Association · Scottish Pelagic Fishermen's Association Ltd ·  
The Scottish White Fish Producers' Association Ltd · Shetland Fishermen's Association

VAT Reg No: 605 096 748

Referring to the final cable route in 9.5, the information needs to be timeously shared with the fishing industry in particular regarding crossings and/or other unburied sections. Also that details on any boulder movements as in 12.1.4 needs to be shared both on a safety basis, and in case they further impinge on fishing and must be mitigated.

Moving to 12.1.12 and 15, the act of trenching and the machinery must not create clay beams or other hazards to fishing, which naturally would require mitigation.

It is also important in terms of SSC that operators should be timed so as not to interfere with any spawning activity. This is very important as ICES, the respected scientific body makes this recommendation, and conforms with the precautionary principle for responsible use of the marine environment.

In appendix 1, the CBRA remains non-specific and makes no claim about total burial. However if there is not total burial the developer must be prepared to mitigate any impacts on fishing this may have.

During the installation phase there must be a competent FLO involved who can properly liaise with the local fleet, and any temporary unburied sections must be guarded.

The operation phase must set out how it will monitor, especially where mobile seabed is identified and report any unburied sections, and explain how fishing will be compensated in such a situation.

Yours faithfully

Redacted

Fisheries Policy Officer

Redacted

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**From:** Redacted  
**Sent:** 12 March 2019 16:17  
**To:** Redacted  
**Cc:** Redacted  
**Subject:** RE: Moray East - OfTI Cable Plan (CaP) Consultation - by 11/03/2019

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Redacted

Thank you for consulting SNH on the Offshore Transmission Infrastructure (OfTI) Cable Plan (CaP) for the Moray East offshore wind farm. On the 11<sup>th</sup> January 2019 we provided advice on the CaP covering the wind farm area. We provide advice on the OfTI CaP below:

1. Section 6.2 – Key subcontractors - mentions bunkering services. As noted in our response on the 14<sup>th</sup> December 2018 to the Vessel Management Plan (VMP), ‘we are unclear if any bunkering is to be undertaken during the course of construction and if so for which vessels and the frequency it may occur’. This is an omission and should be addressed in a further version of the VMP if bunkering activities are likely to occur.
2. Regarding Section 8.3 - UXO survey and clearance - and Section 9.3 - Cabling routing and unexploded ordnance – we have provided advice on the results on the UXO surveys and confirmed we are content with the UXO detonation noise monitoring proposal.
3. The cable route passes through the Southern Trench proposed Marine Protected Area (pMPA) selected for burrowed mud as well as shelf deeps, fronts and minke whale. Results from the benthic surveys show that the burrowed mud (SS.SMu.CFiMu.SpMg, ‘Seapens and burrowing megafauna in circalittoral fine mud’) Priority Marine Feature (PMF) was present for the majority of the OfTI corridor below approximately the 50m contour. The pMPA, and the burrowed mud feature within it, is extensive, with burrowed mud widespread across the southern half of the Moray Firth and relatively widespread across the waters surrounding Scotland. The area of habitat likely to be affected by the OfTI corridor is, therefore, comparatively small compared to the area of burrowed mud within the pMPA and the area should recover, though this may take some time. We advise that the proposal is capable of affecting the burrowed mud feature of the Southern Trench pMPA. However, these effects are insignificant.
4. Benthic surveys also identified an area of stony reef (CR.MCR.EcCr.FaAlCr.Pom biotope) Annex I habitat (EC Habitats Directive 92/43/EEC) in the shallow waters close to the landfall site at Inverboyndie. Reef habitat has a low recoverability and high sensitivity to physical disturbance and smothering. However, the area likely to be affected is relatively small in the context of the wider area and the cable installation is unlikely to have a significant impact.
5. As horizontal directional drilling will be used for the 3 export cables from above Mean High Water Springs out to approximately 1km seaward, it is unlikely that there will be any impacts within the intertidal area.
6. The cable depth burial is between 1.3-1.6m depending on substrate (Section 10.1.3), which is greater than the target burial depth in the modified TI Environmental Statement (2014). This depth should be sufficient to mitigate any electromagnetic fields (EMF). EMF from the cabling will not be greater than baseline (i.e. the earth’s magnetic field) and will not give rise to any significant impacts on fish or benthic interests.
7. We agree that there will be no changes to the predicted impacts (assessed as minor) from the proposed trencher on the benthic ecology and fish and shellfish ecology. Although the trench affected width has

increased from 6m to 8m per cable, the overall length of the trench has reduced from the consented 278km to 197km, meaning the total footprint of habitat loss due to trenching has reduced.

We hope these comments are useful.

Kind regards

Red

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**Redacted** | Policy & Advice Officer – Marine Renewables

Scottish Natural Heritage | Battleby | Redgorton | Perth | PH1 3EW | **Redacted** | [marineenergy@nature.scot](mailto:marineenergy@nature.scot)

Dualchas Nàdair na h-Alba | Battleby | Ràth a Ghoirtein | Peairt | PH1 3EW

[nature.scot](http://nature.scot) – Connecting People and Nature in Scotland – [@nature\\_scot](https://twitter.com/nature_scot)

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**Cc:** Redacted

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I would appreciate if you could acknowledge receipt of this email.

Yours faithfully,

Redacted | Marine Renewables Casework Officer  
Marine Scotland Licensing Operations Team | [marinescotland](http://marinescotland)  
Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB  
Tel: Redacted  
Email: Redacted  
Website: <http://www.gov.scot/marinescotland>

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mearachd, cuiribh fios dhan manaidsear-siostaim no neach-sgrìobhaidh.

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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