



HISTORIC
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ALBA

By email to:
MS.MarineRenewables@gov.scot

Marine Scotland (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Deirdre.Cameron@hes.scot
T: 0131 668 8896

Our case ID: 300045335
Your ref: 00009188
21 May 2021

Dear Marine Scotland

[Marine \(Scotland\) Act 2010](#)
[Mocean Energy Ltd - Wave Energy Converter - EMEC \(Scapa Flow\) Orkney](#)

Thank you for your consultation of 26 April requesting our comments on this proposed marine development.

The application is accompanied by an Environmental Monitoring Plan which sets out detailed information on the known cultural heritage interests within the application area. We agree with the conclusion that the archaeological potential of the area is likely to be extremely low and we therefore have no comments to offer.

Yours faithfully

Historic Environment Scotland

England D (Debbie)

From: Nick Salter <Nick.Salter@mcga.gov.uk>
Sent: 24 May 2021 15:17
To: MS Marine Renewables
Cc: Matthew Macintosh
Subject: RE: MS-00009188 - Mocean Energy Ltd, Billia Croo, EMEC, Orkney - Consultation - Response required by 24 May 2021

Dear Debbie,

Thank you for the below consultation. Thank you for the opportunity to comment on this application for a Marine Licence.

The Technical Services Navigation Branch of the Maritime & Coastguard Agency has reviewed the documents received in the consultation, and we confirm we have no objections to a licence being granted. This is on the understanding that all maritime safety legislation is adhered to, and that the below risk mitigation measures are carried forward into the marine licence.

MCA agrees with the risk control measures listed in Table 4 in chapter 4.2 of the NRA – ideally these will be conditions in the marine licence. The Billia Croo site will already have a site-wide Emergency Response Cooperation plan and the applicant must provide the relevant information to EMEC for the updating of their ERCOP and ensure an updated version is agreed with HM Coastguard at: oele@mcga.gov.uk.

The applicant must also ensure that HM Coastguard, in this case zone2@hmcg.gov.uk, is made aware of the works prior to commencement.

The applicant 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.

The applicant must obtain a Third-Party Verification of the mooring system to ensure the mooring arrangements are suitable for the device at the location. The MCA and HSE has published guidance on regulatory expectations of mooring arrangements which is available at: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>

Advisories:

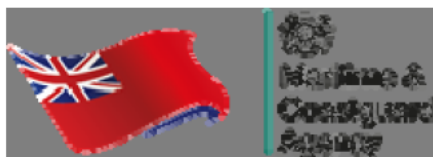
The applicant must obtain a loadline exemption from the MCA for towing the device to and from the site, outside of harbour limits. The nearest MCA Marine Office is in Aberdeen:

Aberdeen Marine Office
Marine House
Blaikies Quay
Aberdeen
AB11 5EZ
Email: Aberdeenmo@mcga.gov.uk

Best regards,

Nick

Nick Salter
Offshore Renewables Lead
Marine Licensing and Consenting
UK Technical Services Navigation



+44 (0) 20 3817 2554
[Redacted]
nick.salter@mcga.gov.uk

Maritime & Coastguard Agency
c/o Falmouth Marine Office
Pendennis Point
Castle Drive, Falmouth
Cornwall, TR11 4WZ

Safer Lives, Safer Ships, Cleaner Seas
www.gov.uk/mca

From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 24 May 2021 13:54
To: Nick Salter <Nick.Salter@mcga.gov.uk>
Cc: Matthew Macintosh <Matthew.Macintosh@mcga.gov.uk>
Subject: FW: MS-00009188 - Mocean Energy Ltd, Billia Croo, EMEC, Orkney - Consultation - Response required by 24 May 2021

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 26 April 2021 16:06
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot
Subject: MS-00009188 - Mocean Energy Ltd, Billia Croo, EMEC, Orkney - Consultation - Response required by 24 May 2021

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Dear Sir/Madam,

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

MS-00009188 – Applicant Mocean Energy Limited (per EMEC) – Wave Energy Converter, Billia Croo wave test site, Orkney

CO-ORDINATES

58° 58.710' N	003° 24.670' W
58° 58.710' N	003° 24.160' W
58° 58.990' N	003° 24.200' W
58° 58.970' N	003° 24.690' W

A marine licence has been requested under the above Act to undertake works at a location below the level of Mean High Water Springs. Licence application details can be found at <https://marine.gov.scot/data/marine-licence-application-00009188>.

Should you have any comments on these proposals, I would be grateful if they could be forwarded to me in an electronic format (MS.MarineRenewables@gov.scot) within 28 days of the date of this email.

If you require an extension to the consultation period, please inform me in writing as soon as possible and within 28 days of this email. A maximum two week extension to the consultation period will only be granted where significant concerns are raised.

If an extension request or a written reply to this consultation is not received within 28 days, it will be assumed that you are content with the proposals.

Any licence that is subsequently issued for the proposed works will be made available on Marine Scotland Information at the address above.

Kind regards,

Debbie England
Marine Renewables Casework Officer
Marine Scotland - Marine Planning & Policy

COVID-19: Marine Scotland - Licensing Operations Team(MS-LOT) is working from home and as a result determination of applications may take longer than our stated timelines. In addition MS-LOT is unable to respond to phone enquiries, please communicate with MS- LOT via email. Email addresses are MS.MarineRenewables@gov.scot for marine renewables correspondence or MS.MarineLicensing@gov.scot for all licensing queries.

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB
Email: Debbie.England@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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Debbie England
Marine Scotland – Licensing Operations Team
Marine Laboratory
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

30 April 2021

Our ref: CNS/REN/TIDAL/EMEC
Billia Croo/Mocean

Dear Debbie

NATURESCOT ADVICE ON THE MARINE LICENCE APPLICATION BY MOCEAN ENERGY LIMITED FOR THE DEPLOYMENT OF THE M100P WAVE ENERGY CONVERTER AT EMEC BILLIA CROO WAVE TEST SITE

Thank you for your consultation on the 26th April for the Marine Licence application by Mocean Energy Limited for the deployment of the M100P ½ scale prototype wave energy converter (WEC) at EMEC Billia Croo wave test site, Orkney.

Background

The Marine Licence application is for the installation, operation and decommissioning of the M100P, which has a generating capacity of 100kW and consists of two yellow painted steel hulls connected at a hinge through a pair of steel hinge pins. The device will maintain its position at the test site by using a mooring system with two lines consisting of chains, polyester line, and subsea buoys. The application is for a licence from May 2021 until February 2022. The device will not be associated with a specific berth as there will be no cable or grid connection.

Advice

We consider that the Mocean device can be installed, operated and decommissioned without significant impacts to natural heritage interests.

The mooring system in the Project Information Summary does not clearly show how the device will be anchored. Figure 4 only shows chains on the seabed which we presume will act as anchors. If this is correct then the PEMP should also mention potential scouring/habitat disturbance on the seabed due to movement of the mooring chains and how this will be monitored (e.g. with the use of drop down cameras).

We welcome the proposals that the deployment of the Mocean device may be monitored under the EMFF co-funded SEA Wave project. This will provide useful information for future deployments.

There is no mention of the reporting schedule for the PEMP. We recommend this is agreed with Marine Scotland and NatureScot.

We hope this advice is of assistance. If further information or advice is required please contact (chris.eastham@nature.scot, mobile: [REDACTED]) in the first instance.

Yours sincerely,

Chris Eastham

Marine Sustainability Adviser



Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: MSL 00009188
Our Ref: AL/OPS/ML/O7_07_169

Ms Debbie England
Marine Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

27 April 2021

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

00009188 – Mocean Energy Limited (per EMEC) – Wave Energy Converter, Billia Croo, Orkney

Thank you for your email correspondence dated 27th April 2021 regarding the application submitted by the **EMEC Ltd**, on behalf of **Mocean Energy**, for consent to install a Wave Energy Converter, named 'M100P', at the EMEC Wave Test Site, Billia Croo, Orkney.

It is noted that this deployment is intended to follow a short deployment at the EMEC Scapa Flow test site.

Northern Lighthouse Board has no objection to the deployment, and requires the following:

- The WEC device is to be predominantly yellow in colour, and fitted with a light, flashing yellow once every 5 seconds (Fl. Y. 5s) and visible from all directions. The light should be mounted on the highest point of the superstructure and have a nominal range of 3 nautical miles.
- A passive radar reflector is to be fitted at a similar elevation in order to enhance the radar profile of the device.
- A yellow "St Andrews Cross" topmark shall be installed below the light.

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- The device to be marked by AIS as an Aid to Navigation, transmitting a Type 21 message. A separate AIS licence, issued by OFCOM, will be required.
- **Mocean Ltd** liaise with all local marine stakeholders during the installation to ensure the promulgation of Notice to Mariners regarding the timeframe and nature of works
- Whilst the device is in its installation/operation/maintenance phase, it should be actively monitored, and any catastrophic failure events should be responded to as described within existing Emergency Response Plan.
- UK Hydrographic Office are provided with all relevant details, including 'as laid' positions, of all infrastructure to ensure updates are applied to appropriate navigational charts.

All navigational marking and lighting of the device or its associated infrastructure will require the Statutory Sanction of the Commissioners of Northern Lighthouses prior to deployment. This form can be downloaded from the Northern Lighthouse Board website, or on request from 'navigation@nlb.org.uk'.

Yours sincerely



Peter Douglas
Navigation Manager

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21/178/MARCON Wave Device – Billia Croo

MS-00009188 - Mocean Energy Ltd, Billia Croo, EMEC, Orkney - Consultation

OIC Marine Planner comments 13/05/2021

The information provided does not appear to make clear on how will the device travel to the site. If it is being towed from outwith the Orkney Islands regional marine waters, appropriate measures should ensure there is no risk of introducing non-native species and ensure it causes minimal disturbance when transiting through any designated sites e.g. Scapa Flow pSPA or other marine users e.g. aquaculture/ferries.

Comments on any potential impacts on safety/navigation or harbour requirements may be supplied directly by the Harbour Authority.