

## Lees E (Emma)

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**From:** Helen Croxson <Helen.Croxson@mcga.gov.uk>  
**Sent:** 01 April 2020 21:26  
**To:** MS Marine Renewables  
**Cc:** Wilson J (Jessica)  
**Subject:** RE: Seagreen Alpha & Bravo Offshore Wind Farm - Offshore Transmission Asset Construction Method Statement - Consultation

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

Dear Emma,

Thank you for the opportunity to comment on the Construction Method Statement for the Seagreen Offshore Windfarm.

The MCA has no concerns regarding the content of the document. We do have some minor observations to make for your consideration:

- 1) We note that the documents states at 5.6 *Seagreen requires contractors and sub-contractors, in undertaking the construction of the Seagreen OTA Project, to comply with all relevant environmental and maritime legislation and that all necessary licences and permissions are obtained by the contractors and their sub-contractors, through conditions of contract.*

Please be aware that the relevant MCA Marine Office may need to be notified with regards to any required survey, certification and inspection arrangements in advance of works commencing.

- 2) The document should make reference to the Emergency Response Cooperation Plan (ERCoP). It should be noted that the ERCoP must be reviewed and updated in consultation with MCA.

Please let me know if you have any questions.

Kind regards

Helen



**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: 07468353062

Email: [Helen.Croxson@mcga.gov.uk](mailto:Helen.Croxson@mcga.gov.uk)

Please note I currently work Tuesdays, Wednesdays and Thursdays.

# Northern Lighthouse Board

Your Ref: Seagreen A&B – OTA CMS  
Our Ref: AL/OPS/ML/O6\_02\_636

84 George Street  
Edinburgh EH2 3DA  
Switchboard: 0131 473 3100  
Fax: 0131 220 2093  
Website: [www.nlb.org.uk](http://www.nlb.org.uk)  
Email: [enquiries@nlb.org.uk](mailto:enquiries@nlb.org.uk)



Marine Scotland – Marine Planning and Policy  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

5 March 2020

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

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

Thank you for your e-mail correspondence dated 5<sup>th</sup> March 2020 regarding the post-consent Construction Method Statement submitted by **Seagreen Alpha Wind Energy Ltd** in order to satisfy condition 3.2.2.4 of the Offshore Transmission Asset (OTA) marine licence and condition 3.1.1 of the Alternative Landfall Cable Installation Methodology Marine Licence.

Northern Lighthouse Board are satisfied with the content of the Construction Method Statement, and note the mitigation measures to reduce the hazards to navigation, that have been included within this document. NLB also note the references to Seagreen document LF000009-CST-OF-PLN-0010 (Lighting & Marking Plan).

Yours sincerely

[Redacted]

Peter Douglas  
Navigation Manager

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## For the safety of all

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## Lees E (Emma)

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**From:** Cagnoni, Silvia <Silvia.Cagnoni@sepa.org.uk>  
**Sent:** 13 March 2020 14:29  
**To:** MS Marine Renewables  
**Cc:** Wilson J (Jessica)  
**Subject:** FW: Seagreen Alpha & Bravo Offshore Wind Farm - Offshore Transmission Asset Construction Method Statement - Consultation

Emma,

As offshore falls within the remit of Marine Scotland we have limited comments to make in relation to the Offshore Transmission Asset Construction Method Statement. Please see below comments from SEPA's specialists.

### 1. Regulatory team

- 1.1 The local SEPA team support renewable energy in the right location. The lead regulator for the offshore project is likely Marine Scotland, however the only representation the local SEPA would like to make would be for any engineering or trenching work to be programmed out with the bathing water season (1 June to 15th September) "if possible".
- 1.2 The local SEPA team have been consulted and are involved via planning and CAR licencing of the on-shore section of the cable from land drop at Carnoustie to Tealing and will continue to lead environmental regulation of that part of project.

### 2. Marine ecology

- 2.1 The document does consider landfall installation up to MHWS and describes the two options for cable installation at landfall - open cut trenching or horizontal directional drilling (HDD). HDD would seem to be the least intrusive and, therefore, least damaging method and therefore we would advocate its use wherever possible.

Regards

Silvia

***Silvia Cagnoni-Watt***

*Senior Planning Officer*

SEPA, Strathallan House , Castle Business Park, Stirling, FK9 4TZ , tel: **01786 452430**, email: [silvia.cagnoni@sepa.org.uk](mailto:silvia.cagnoni@sepa.org.uk)

working hours: **Monday, Tuesday, Thursday: full day, Wednesday, Friday: morning only;**

[Redacted]

## Lees E (Emma)

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**From:** Karen Taylor <Karen.Taylor@nature.scot>  
**Sent:** 01 April 2020 16:47  
**To:** MS Marine Renewables  
**Cc:** Wilson J (Jessica); MARINEENERGY  
**Subject:** RE: Seagreen Alpha & Bravo Offshore Wind Farm - Offshore Transmission Asset Construction Method Statement - Consultation

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

Dear Emma,

Thank you for your request for our advice on the Construction Method Statement ("CMS") submitted by Seagreen Alpha Wind Energy Limited (Seagreen) in order to satisfy condition 3.2.2.4 of the OTA marine licence and condition 3.1.1 of the Alternative Landfall Cable Installation Methodology marine licence. We note this CMS covers the construction of the Offshore Substation Platforms (OSPs), OSP interconnection cables, export cables and landfall installation of the export cable up to mean high water springs (MHWS). We are content that this document (reference: LF000009 CST OF MST 002 Rev 01) is fit for purpose, subject to our advice as outlined below:

### **Section 4 – Roles & responsibilities**

It would be useful to understand how the roles/responsibilities of the Contractor's Construction Environmental Advisor (CEAs) will interact with the Compliance Team described in 4.1.8.

### **Section 6 – Construction procedures, mitigation and good working practices**

It would be helpful if Figure 6.3 was annotated more descriptively to aid visualisation of the intended works.

Scour protection is mentioned in relation to the OSP jacket foundations and that the need for this will be confirmed at a later date as indicated in 6.6.2 (and Appendix D). We advise that any scour protection should be mapped (both location and materials) and notified to MSLOT.

The OSP interconnection cable and three subtidal export cables will be trenched and buried in the seabed as described in section 6.8 / 6.9 and Appendix D, to a target depth of at least 1m to minimize EMF effects. Any further advice we have on this we will qualify once we have received the OTA Cable Plan. Should an engineered rock placement solution be required where trenching to the required depth has not been possible, this should be mapped and notified to MSLOT.

### **Marine Invasive Non Natives**

We welcome the commitment outlined in Appendix D with respect to the dry transportation of any necessary replacement rock needed for the reinstatement of the rock revetment in order to reduce the risk of introducing invasive non-native species. Marine invasive non-native species should also be considered. We request that reference is made within this plan that each contractor should have an agreed biosecurity protocol, which should apply at the port of departure as well as transiting to site, in order to minimise the spread of marine invasive non-native species. The role of the ECOW in checking and agreeing these protocols should also be identified and the updated OTA CMS cross referenced with the relevant section within the construction EMP.

Lastly, we recall from the Marine Licence application for the Alternative Landfall Cable Installation Method that a fourth spare HDPE pipe would be added through the rock revetment only which would help future proof the project - it would be helpful to clarify if this is still the intention as this is not mentioned within the OTA CMS.

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 and 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  
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](mailto:marineenergy@nature.scot)**

[Redacted]