

Strategic Development Delivery Team
Infrastructure Services
Aberdeenshire Council
Woodhill House
Westburn Road
Aberdeen
Tel: 01224 664256
Stuart.Murison@aberdeenshire.gov.uk
12 June 2017

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland (Licensing Operations Team)
375 Victoria Road
Aberdeen
AB11 9DB

Dear Madam,

Consultation response from Aberdeenshire Council (ENQ/2017/1024): MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING; Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms. Address: Offshore Site in Moray Firth, To the North Of Inverboyndie Bay, Banff.

I refer to your request for a consultation response for the above proposal received on 29 May 2017. Aberdeenshire Council consider that Marine Scotland are generally well placed to provide the expertise required to determine if the proposal is acceptable and if the proposal can be adequately managed with low risk to the marine environment.

Having reviewed the amended parameters of the proposal, namely the increase from 2 to 4 Offshore Substation Platforms (OSP's), it is noted and accepted that the amendments would still fall within the originally approved design envelope and as a result no further adverse impacts would result. In terms of the interests of Aberdeenshire Council Planning Service, in consultation with colleagues covering Natural Heritage and Archaeology, the amendments do not give rise to any specific concerns and as such Aberdeenshire Council would raise no objections to the proposal.

Should you have any issues, concerns or questions regarding the above, please do not hesitate to contact me using the contact details provided at the top of this letter.

Kind Regards,



Stuart Murison
Senior Planner



5 June 2017
Your reference:

Our ref.WID10632

Dear Sir/Madam,

RE: PROPOSED Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam

Thank you for your email.

We have studied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that the project should not cause interference to BT's current and presently planned radio networks.

Regards

Yours sincerely

Dale Aitkenhead
BT Network Radio Protection

From: [REDACTED]
To: [MS Marine Renewables](#)
Cc: [James Cusiter](#); [Drew J \(Jessica\)](#); [Bob Buskie](#); [Joanne Allday](#); [Graham Grant](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 23 June 2017 15:40:49
Attachments: [image002.jpg](#)

Good afternoon

Many thanks for the consultation opportunity set out below, I can confirm that we have completed our review and have nothing further to add.

Kind regards

[REDACTED]



[REDACTED] I General Manager
Port Office, Shore Road, Invergordon IV18 0HD
tel: [REDACTED] I fax: [REDACTED] I mob: [REDACTED] I web: www.cfpa.co.uk

From: MS.MarineRenewables@gov.scot [<mailto:MS.MarineRenewables@gov.scot>]
Sent: 29 May 2017 15:46
Cc: Catarina.Aires@gov.scot; Nicola.Bain@gov.scot; Sophie.Humphries@gov.scot
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam,

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

COORDINATES

Latitude Co-ordinates	Longitude Co-ordinates
58° 19.378086'	-2° 44.296467'
58° 13.147457'	-2° 34.264754'
58° 8.080106'	-2° 34.183576'
58° 3.945539'	-2° 54.796212'
58° 12.571202'	-2° 52.451411'

(WGS84)

From: [DIO-Safeguarding-Offshore \(MULTIUSER\)](#)
To: [MS Marine Renewables](#)
Subject: RE: CONSULTATION - 20170630-Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms-DIO 10040450
Date: 30 June 2017 11:12:31

Good Morning Jessica,

Further to your e-mail below and after our assessment, I can confirm that the MOD has No Objection to this activity. Apologies for the delay in replying.

Regards

Michael Billings

Safeguarding Assistant- Environment & Planning Support – Safeguarding
DIO Safety Environment & Engineering
Defence Infrastructure Organisation
Kingston Road, Sutton Coldfield, West Midlands, B75 7RL

MOD telephone: [REDACTED] **Telephone:** 0121 311 2025 | **Fax:** 0121 311 2218 | **Email:** DIOSEE-EPSSG2A1A@MOD.UK

Website: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Release-Authorised:

Recipient(s):

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From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]

Sent: 29 May 2017 15:54

Cc: Catarina.Aires@gov.scot; Nicola.Bain@gov.scot; Sophie.Humphries@gov.scot

Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam,

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

COORDINATES

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HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:
MS.MarineRenewables@gov.scot

Marine Scotland
Marine Scotland Licensing Operations Team
Marine Scotland (Aberdeen Office)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our ref: AMA/16/31/53
Our case ID: 300019394
Your ref: 06347
14 June 2017

Dear Sir/Madam

Marine (Scotland) Act 2010
06347 - Moray East - Two Offshore Substation Platforms for the consented Telford,
Stevenson and MacColl Offshore Wind Farms

Thank you for your email enquiry of 29 May requesting our comments on this marine licence application.

We note that the proposed works involve a change from the construction of two large offshore substation platforms to four smaller platforms. This alteration to the existing scheme should not result in any significant additional impact to cultural heritage sites.

I can, therefore, confirm we have no comments to make on the proposals.

Yours faithfully

Deirdre Cameron
Historic Environment Scotland

From: [JRC Windfarm Coordinations](#)
To: [Drew J \(Jessica\)](#)
Subject: Fwd: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms. [WF176847]
Date: 31 May 2017 15:47:48

Dear jessica,

A Windfarms Team member has replied to your coordination request, reference **WF176847** with the following response:

Dear Sir/Madam,

Planning Ref: MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING -- 06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Name/Location: Moray Firth -- Offshore

Site Centre/Turbine at NGR/IGR: n/a

Development Radius: n/a

Hub Height: n/a Rotor Radius: n/a

Scope: Offshore Substation Platforms (max dimensions 100m x 100m x 70m above LAT)

Location : within the area of sea defined by the following boundary points:

Latitude Co-ordinates Longitude Co-ordinates

58° 19.378086'	-2° 44.296467'
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58° 3.945539'	-2° 54.796212'
58° 12.571202'	-2° 52.451411'

This proposal cleared with respect to radio link infrastructure operated by:

The Local Electricity Utility and Scotia Gas Networks

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the

disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

The Joint Radio Company Limited
Dean Bradley House,
52 Horseferry Road,
LONDON SW1P 2AF
United Kingdom

Office: 020 7706 5199

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

<http://www.jrc.co.uk/about-us>

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xx2bqaaf1emaaaKv06rRUkY%2BdzZg%3D%3D>

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For more information please visit <http://www.symanteccloud.com>

This email has been received from an external party and

has been swept for the presence of computer viruses.

From: [Jessica Drew@gov.scot](mailto:Jessica.Drew@gov.scot)
To: [Nick Salter](#)
Cc: [Humphries S \(Sophie\)](#); [Peter Lowson](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 29 June 2017 14:27:43
Attachments: [image001.png](#)

Good afternoon Nick,

Further to your email, I have received the following information from Moray East:

Moray East reply: Moray East can confirm that the OSPs will be placed aligned with the wind turbines using a grid or offset grid layout.

Kind regards,

Jessica

From: Nick Salter [mailto:Nick.Salter@mcga.gov.uk]
Sent: 26 June 2017 15:22
To: Drew J (Jessica); MS Marine Renewables
Cc: Humphries S (Sophie); Peter Lowson
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Jessica,


Thanks for the reminder but I note the deadline is today.

I have a concern with the application for which I would like some assurance from the applicant. The exact locations of the two platforms are not yet known however it is important for navigation and Search & Rescue reasons that all structures within a wind farm boundary are aligned and in straight rows/columns. The layout design of the turbines is also not yet known so I would like assurance from the applicant that the platforms will be aligned with the turbines, or vice versa, and in straight lines.

If the applicant provides this I'd be grateful if you could forward this to us and we will have no objections to the marine licence being issued.

Best regards,

Nick

Nick Salter
Offshore Renewables Advisor
Navigation Safety Branch | Maritime and Coastguard Agency
Spring Place | 105 Commercial Road | Southampton | SO15 1EG
Tel: 020 3817 2433 |  | Email: nick.salter@mcga.gov.uk

MCA_3298_AWv4



Safer Lives, Safer Ships, Cleaner Seas

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 26 June 2017 11:13
Cc: Sophie.Humphries@gov.scot
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

From: [Neal MacPherson](#)
To: [Drew J \(Jessica\)](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 26 June 2017 13:52:43
Attachments: [image001.png](#)

I refer to the below consultation and apologies for the delay in replying,

I can confirm that Moray Council have a 'nil response' on this consultation and have no comments to offer.

Regards,

Neal MacPherson | Principal Planning Officer | Development Management Planning
neal.macpherson@moray.gov.uk | 01343 563266 | [website](#) | [facebook](#) | [twitter](#) | [newsdesk](#)



From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 26 June 2017 11:13 AM
Cc: Sophie.Humphries@gov.scot
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam,

The deadline for providing comments on the proposed works detailed below was **26th June 2017**. As the deadline has now passed please contact us immediately to arrange an extension to the consultation period should you wish to provide comments. If you have no comments to make please submit a "nil return" response.

If you require further information please let us know.

Yours faithfully

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

Scottish Government
Marine Laboratory

From: [ALLEN, Sarah J](#) on behalf of [NATS Safeguarding](#)
To: [MS Marine Renewables](#)
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 30 May 2017 10:37:38

Good Morning,
Thank you for your email. I can confirm that we have no objection to this particular part of the application (our ref: SG9265).
Kind Regards
NATS Safeguarding

From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]
Sent: 29 May 2017 15:46
Cc: Catarina.Aires@gov.scot; Nicola.Bain@gov.scot; Sophie.Humphries@gov.scot
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Mimecast Attachment Protection has created safe copies of your attachments.

Dear Sir/Madam,

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

COORDINATES

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(WGS84)

Marine Scotland Licensing Operations Team (MS-LOT) have received the attached proposal under the above Act for a Marine Licence for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Please find attached the application form, chart and supporting information.

Please forward any comments you may have on these proposals, in an electronic format to MS.MarineRenewables@gov.scot by **Monday 26th June 2017**

If you are unable to meet this deadline please inform us in writing as soon as possible. We will aim to grant an extension to the consultation period.

The Marine Licence for the Telford, Stevenson and MacColl Offshore Wind Farms, as well as other relevant documentation, can be found on our website using the following link:
<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Moray3>

Northern Lighthouse Board

CAPTAIN PHILLIP DAY
DIRECTOR OF MARINE OPERATIONS

Your Ref: 06347 - JD – MEOWF-OSP
Our Ref: AJ/OPS/ML/O6_01_429

Ms Jessica Drew
Marine Renewables Casework Officer
Marine Scotland
Marine Scotland Licensing Operation Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

84 George Street
Edinburgh EH2 3DA
Switchboard: 0131 473 3100
Fax: 0131 220 2093
Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk



19 June 2017

Dear Jessica

Marine and Coastal Access Act 2009, Part 4 Marine Licensing

Marine Licence application for two Offshore Substation Platforms at the Moray East Offshore Wind Farm

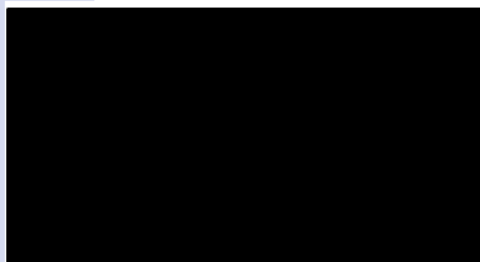
Thank you for your correspondence dated 29 May 2017 and regarding the application from **Moray East Offshore Windfarm Limited (Moray East)** to deploy and operate for two Offshore Substation Platforms (OSP's) at the Moray Firth Offshore Wind Farm Eastern Area Development.

We note that the application is based on the additional two OSP's being of such a construction that possible deployment of all four OSP's will still meet the requirements of the original licence with regard to overall footprint design of the two larger modified versions and the EIA and Navigational Risk Assessment submitted in support of the licence.

We would further note that although the design parameters of the additional two OSP's will be such that the overall footprint area is not greater than the design footprint of the original submission and licence for two, we would therefore enquire if due to there now being four OSP structures, the Navigational Risk Assessment reflect this increase in structures.

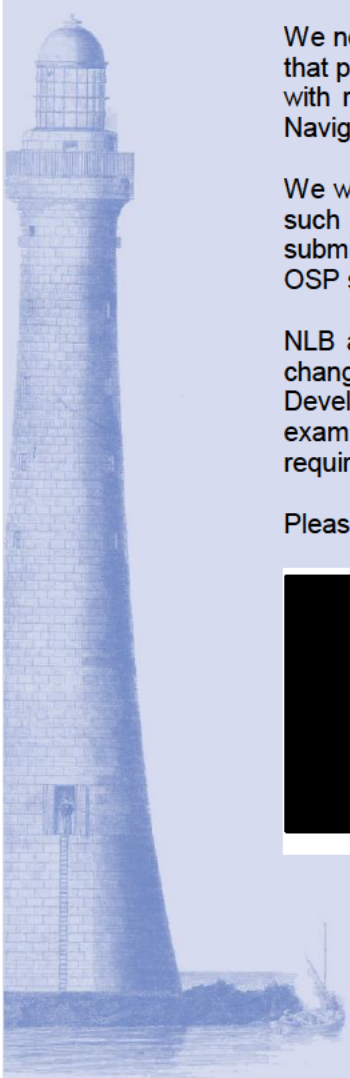
NLB are content with the application for an additional two OSP's but would require that any changes to the marking and lighting recommendations proposed for the Eastern Area Development be based on IALA Recommendation O-139, and that NLB would also require to examine the amended layout and recommend any changes to the previous marking requirements if necessary when the final locations of the OSP's are decided.

Please advise if we can be of any further assistance, or require clarification any of the above.



the safety of

to: ISO 9001:2000 · The International Safety Management Code (ISM) · OHSAS



12 June 2017

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh
EH12 9DQ

Tel: +44 (0)131 317 7388
Fax: +44 (0)844 556 9549
Email: admin@ryascotland.org.uk
Web: www.ryascotland.org.uk

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms

Dear Ms Drew,

I have read the above Marine Licence application and agree that the risk to navigation during construction and decommissioning is small with mitigation and that during operation is also minor. The risk can be reduced further by appropriate siting of the substations in relation to the turbine positions. A Pilot for these waters based on the existing Imray *Yachtsman's Pilot North and East Scotland* and the Forth Yacht Clubs Association *Pilot Handbook East Coast of Scotland* is currently in preparation for publication by Imray, Laurie, Norie & Wilson Ltd but it will not be available for about a year. Incorporation of details of the windfarm in this pilot can be an additional form of mitigation for the operational phase.

Yours sincerely,



Dr G Russell FRMetS MCIEEM
Planning and Environment Officer, RYA Scotland



Our Ref: MM/dr-17/26

Your Ref:

26 June 2017

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

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

www.sff.co.uk

E-mail: Jessica.drew@gov.scot

E-mail: ms.marinerenewables@gov.scot

Dear Sirs

MORAY EAST APPLICATION FOR TWO ADDITIONAL OSP

The Scottish Fishermen's Federation is pleased to respond to this application on behalf of The 500 plus fishing vessels in membership of its nine constituent associations:- Anglo Scottish Fishermen's Association, Clyde Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association (Scotland) Ltd, Mallaig and North-West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association Ltd, Scottish White Fish Producers Association Ltd and the Shetland Fishermen's Association.

Whilst accepting the fact that the proposal for four OSP's will give an equivalency in area of these compared to the original two. The SFF remains concerned that rather than having two points of aggregation for input cables, there could now be four area distinct areas affected.

The SFF believes that this inevitably means four areas that will become subject to displacement within the windfarm, and thus double the displacement within the windfarm. The SFF notes the following points.

From the OSP statement of April 2017 table 3.1, the effect at construction on sediment could be doubled.

From table 3.2, at construction, the temporary seabed disturbance and increases in sediment could be doubled.

Again 3.2 at operation, minimal figures are claimed, but the SFF believes the net reduction of original habitat will be exponential, indeed the statement in the scenario column accepted this.

Members:

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

VAT Reg. No: 605 096 748

For habitat and community change in operation at 3.2, accepts that the development will charge both the habitat and community. This in effect is a major impact on the benthos, not necessarily a welcome change as the paper seems to imply.

Moving onto table 3.3 Fish and Shellfish Ecology, looking at construction, the catch all, temporary disturbance is likely to be at least doubled by the change to four OSP's. Also the habitat loss, as a temporary disturbance is likely to be doubled.

During operation, the changes to fishing activity due to the loss of habitat, the extra safety zones, the benthic community and all the impacts touched on here, is likely to be very significant. This is quite clear from the only published work on the matter, prepared for the Crown Estate.

So therefore the SFF does not accept that changing from two large OSP's to four smaller ones makes no difference, indeed we believe the effects could be much increased in a negative sense, so the SFF would expect the project to fully assess all the noted effects above in order to prove the developers' contention that these proposals effects will be no worse than the current license.

Yours faithfully


Fisheries Policy Officer, Scottish Fishermen's Federation



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Marine Scotland
Marine Laboratory
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

Your ref: 06347 – Moray East –
Two Offshore Substation Platforms
for the consented Telford,
Stevenson and MacColl Offshore
Wind Farms.

For the attention of: Jessica Drew

Our ref: CNS/REN/OSWF/Moray
Firth/CLC146248

By email only:

Date: 15 June 2017

MS.MarineRenewables@gov.scot
jessica.drew@gov.scot

Dear Sirs,

MORAY OFFSHORE WINDFARM (EAST) LIMITED

OFFSHORE SUBSTATION PLATFORMS FOR TELFORD, STEVENSON AND MACCOLL

SNH ADVICE ON MARINE LICENCE APPLICATION

Thank you for your consultation of the 29 May 2017 requesting our advice on the Marine Licence application for the addition of two (further) Offshore Substation Platforms (OSPs) to be sited within the consented Telford, Stevenson and MacColl Offshore Windfarm development area known as 'Moray East'.

Background

Offshore substation platforms were previously considered within the wider Moray East transmission infrastructure (OfTI) application in early 2014, and subsequently modified later that year. Consent was then granted for a maximum design of up to 2 'traditional' OSPs with a topside dimension of 100x100m, a jacket base width of up to 100m and a maximum of 32 pin piles depending on substructure chosen (see Table 2-1: OSP Design Parameters).

This application utilises the same worst-case scenario assessed in the modified OfTI Environmental Statement (ES) in 2014. The addition of two further OSPs changes the design parameters as follows:

- Up to 4 distributed OSPs with smaller topside (50 x 50m), and
- a smaller jacket base width of up to 40m using a jacket substructure

The number of pin piles required would remain at 32 as assessed within the maximum design parameters of the modified OfTI as would the length of inter-platform cabling and all other transmission infrastructure. Therefore, should the developer decide that 4 OSPs are required, the maximum design parameters of all four combined would not exceed that of the modified OfTI which was previously deemed acceptable and consent granted with conditions in 2014.

SNH Advice on application

We have reviewed the 'Moray East Offshore Substation Platform Marine Licence Statement Regarding Implications for the ES and HRA' report (referred to hereafter as, OSP ML Statement) within the context of our previous advice (letters dated, 23 May 2014 and 14 August 2014) which we provided for the (wider) transmission infrastructure application and modified application.

We are content that the OSP ML Statement considers all of the relevant potential effects likely to occur from the installation and operation of up to four distributed OSPs. The natural heritage features potentially affected by the proposed changes to the OSP design are outlined below, together with narrative on the likely significance of these changes. Our advice is restricted to the potential impacts from the proposed changes to the OSPs to be sited within the Moray East windfarm development footprint. They exclude all other aspects of the transmission works e.g. cable corridor and landfall, which remain as before.

- **Hydrodynamic Processes & Coastal Geomorphology**

We advised previously that the potential impacts from the installation of the OSPs were "negligible" in respect of offshore coastal processes and of "minor significance" in respect of suspended sediment concentrations, with no significant risk of longer-term changes to tidal and wave regimes or to sediment transport regimes arising over the lifespan of the OSPs. We felt that possible scour effects were of "minor significance" and advised that impacts arising from installation and operation of the OSPs would not significantly add to the predicted levels of cumulative impact from the consented MORL and BOWL windfarm schemes.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

- **Benthic Ecology**

Priority Marine Features

As indicated previously, a number of PMFs were identified in the benthic survey including burrowed mud, ocean quahog (*Arctica islandica*), European spiny lobster (*Palinurus elephas*), sandeels (*Ammodytidae*) and potentially *Arachnanthus sarsi* (a type of anenome, but it wasn't confirmed for definite on-site).

We noted that the 2014 OfTI ES predicted some loss of habitat from the OSPs as well as from scour / cable protection with some temporary disturbance of the seabed, however, all impacts were classed as being of 'minor significance'. Impacts were considered to be localised, short term and reversible, and the assessment took into account the tolerance and recoverability of habitats. We therefore agreed with the ES conclusion that there would be no risk of significant impact to the national or regional status of any of these aforementioned PMFs.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

- **Fish and Shellfish of Conservation Concern**

Our response of 8 July 2014 provided detailed advice on fish and shellfish of conservation concern including Habitats Regulations Appraisal (HRA) in respect of the qualifying interests of freshwater Special Areas of Conservation.

HRA for freshwater SACs

Of the SACs listed in our 8 July 2013 response, we advised of the need to address possible impacts from the transmission works on qualifying interests from the River Spey SAC. In this regard, we advised of a likely significant effect on Atlantic salmon and lamprey species which could be disturbed by construction noise and / or possible effects of electro-magnetic fields

(EMF) from installed cables. Freshwater pearl mussel could be indirectly affected through any impacts to Atlantic salmon, one of their host species.

However, we advised that the MORL transmission works with identified mitigation (covering soft-start piling and burial of cables) would not give rise to any long-term impacts on SAC freshwater fish populations or freshwater pearl mussels, and concluded no adverse impacts on site integrity of the River Spey SAC, nor other SACs which may be under consideration. This was reflected through subsequent licence conditions.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

- **Marine Mammals**

We noted previously that the installation of the OSPs foundations were likely to give rise to underwater noise impacts. The assessment of underwater noise impacts included modelling of noise emitted from pile driving foundations which was undertaken using a worse-case scenario of 32 pin piles for MORL and included cumulative impacts with respect to Beatrice. Following further modelling to assess whether disturbance to individuals could result in population level effects, we were satisfied that there would be no long-term effects from underwater noise disturbance on the bottlenose dolphin population of the Moray Firth SAC and as such no adverse impact to SAC site integrity was concluded.

We also agreed that all other potential impacts on bottlenose dolphin arising from transmissions works, including vessel collision, EMF effects, contamination, and prey availability, would be 'minor' and would not give rise to any 'likely significant effect' in respect of this species status as an SAC interest.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

- **Ornithology**

The OfTI ES assessment concluded that all potential effects on waterbirds and seabirds were not considered significant and that disturbance impacts would be short-term and reversible. Identified mitigation to minimise disturbance included vessel management where traffic would follow set routes, as outlined through subsequent licence conditions.

The potential for displacement from the previously assessed two traditional OSPs was considered to be localised to a small area covering 0.02 km², the four smaller distributed OSPs would cover 0.01km². The assessment of benthic and fish populations was also assessed as 'minor' for all species. We agreed with this assessment and emphasised the need for the proposed mitigation – particularly timing of works – to be addressed through the submission of the construction programme and method statements as part of the licence conditions.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

- **Landscape, Seascape and Visual Impact Assessment**

As advised previously, we welcome the work undertaken to assess the landscape and visual impacts of the OSPs and recommended that their location and design should be considered as part of the overall design process for Telford, Stevenson & MacColl windfarms. This was addressed through the design statement licence condition.

The proposed changes to the OSPs design presented in the current application are within the previously assessed worst-case scenario and so our advice remains as before.

SNH Advice summary

Therefore, on the basis of our assessment, we agree that the increase in number of distributed OSPs to four, albeit with smaller dimensions, will not result in any impact greater than that previously assessed under EIA and HRA. Having reviewed the existing Marine Licence conditions (Licence Number 05340/14/0), we anticipate that they remain applicable to this proposal going forward.

We hope these comments are helpful. If further information or advice is required please contact me in the first instance: karen.taylor@snh.gov.uk or 01546 603611.

Yours faithfully,

KAREN TAYLOR
Marine Renewable Energy Casework Adviser

From: [Reception](#)
To: [Drew J \(Jessica\)](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 27 June 2017 09:30:56

Hi Jessica,

Thank you for your email.

The Scottish Wildlife Trust would like to submit a nil return response to this consultation.

Regards,

Gillian

Gillian Wilson(Miss)
Temporary reception/Venue Coordinator
Scottish Wildlife Trust
Tel: [REDACTED]
Fax: 0131 312 8705
Email: reception@scottishwildlifetrust.org.uk
Charity no: SC005792

From: Jessica.Drew@gov.scot [<mailto:Jessica.Drew@gov.scot>]
Sent: 26 June 2017 11:13
Cc: Sophie.Humphries@gov.scot
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam,

The deadline for providing comments on the proposed works detailed below was **26th June 2017**. As the deadline has now passed please contact us immediately to arrange an extension to the consultation period should you wish to provide comments. If you have no comments to make please submit a “nil return” response.

If you require further information please let us know.

Yours faithfully

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

Scottish Government

From: [David Mudie](#)
To: [Drew J \(Jessica\)](#)
Cc: [Humphries S \(Sophie\)](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 26 June 2017 11:30:09
Attachments: [image001.jpg](#)

The Highland Council has no comment to make on the Marine Licence Applications.

David Mudie

Team Leader - Development Management

Development and Infrastructure Service, The Highland Council, Kintail House, Beechwood Business Park, Inverness, IV2 3BW

(01463) 255205

This advice is given without prejudice to the future consideration of and decision on any application received by The Highland Council.

Thathar a' toirt seachad na comhairle seo gun chlaon-bhreith do bheachdachadh air agus co-dhùnadh a thaobh tagradh sam bith a tha Comhairle na Gàidhealtachd a' faighinn san àm ri teachd

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Follow up documentation for existing planning applications

Follow up documentation should no longer be submitted directly to Planning Officers or to Area Planning Offices. If you would like to submit revised plans or any other follow up/additional documentation in relation to an existing application, please do so by using the Post Submission Additional Document online form available on the [ePlanning.scot](#) Portal. Further guidance on how to do this can be found here on our Planning Web Pages. Please remember to quote the correct application reference number on the online form before submitting. Thank you for your co-operation.

Register at <http://consult.hIGHLAND.gov.uk> to view, comment and be kept up to date on any future Development Plan documents in Highland.

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 26 June 2017 11:13
Cc: Sophie.Humphries@gov.scot
Subject: GSX: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.



Marine Scotland
Per: Ms Catarina Aires
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Please ask for / Foighnich airson: Emma Forbes
Direct Dial / Àireamh fòn: 01955 609554
Email / Post-d: emma.forbes@highland.gov.uk
Our Ref / Ur n-àireamh-iùil: 17/03121/PREAPP/EMFO/BERE
Your Ref / Ar n-àireamh-iùil:
Date / Ceann-là: 4 July 2017

Dear Sir/Madam

**PRE-APPLICATION ADVICE FOR LOCAL DEVELOPMENTS
COMHAIRLE RO-IARRTAIS DO LEASACHAIDHEAN IONADAIL
MARINE LICENSE FOR TWO OFFSHORE SUBSTATION PLATFORMS AT MACCOLL OFFSHORE
WINDFARM, ULBSTER, LYBSTER,**

Thank you for your application for pre-application advice.

Your application was registered on 26 June 2017 and the case officer is Emma Forbes. Please submit any additional or follow up information via the ePlanning.scot portal at <https://www.eplanning.scot> using the Post Submission Additional Documents online form.

We aim to respond to you in writing within six weeks of your application being validated. Under certain circumstances, however, we may not be able to provide a full response by our target deadline. In this case, we will write to you to explain the reasons why and provide you with a revised response date.

Yours faithfully

Emma Forbes
Planner

Jessica Drew
Marine Scotland
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Your ref:
06347

Our ref:
TS00538

Date:
19/06/2017

MS.MarineRenewables@gov.scot

Dear Sirs,

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING
MORAY EAST – TWO OFFSHORE SUBSTATION PLATFORMS FOR THE CONSENTED
TELFORD, STEVENSON AND MACCOLL OFFSHORE WIND FARMS.

With reference to your recent correspondence on the above development, we acknowledge receipt of the Offshore Substation Platforms (OSP) Statement prepared by Moray Offshore Windfarm (East) Limited (Moray East) in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the review undertaken, we would provide the following comments.

Proposed Development

The Proposed Development site is located in the north-east of Scotland, approximately 22 km from the Caithness coast in the Moray Firth. The nearest Trunk Road to the site is the A9(T) between Helmsdale and Lybster.

Further to a Marine License being granted on the 25 September 2014 for the Modified Offshore Transmission Infrastructure (Modified OfTI) required for the Telford, Stevenson and MacColl offshore wind farms, we understand that Moray East now requires to use up to four distributed OSPs as part of the project's Modified OfTI. This is as a result of a recent development of OSP technology. We note that the original 2014 Marine License allowed for up to two OSPs.

As a result of this change in design, Moray East is applying for a new Marine License for two additional distributed OSPs.

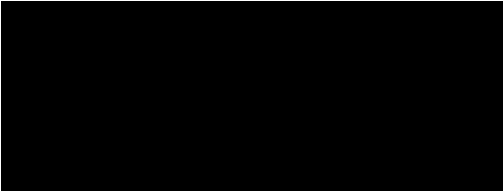
Having reviewed the submitted Statement, we are happy with the conclusion that the revised design does not represent a material change requiring a revised Environmental Statement.

Given the above, Transport Scotland has no objection to the proposed change to the design or to the granting of a new Marine License.

We would however, advise that if any abnormal loads associated with the offshore elements of the project are required to be transported on the Trunk Road network, then Transport Scotland should be consulted.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 226 6923.

Yours faithfully



John McDonald

**Transport Scotland
Trunk Road and Bus Operations**

cc Alan DeVenny – SYSTRA Ltd.



From: [Ferguson V \(Val\)](#)
To: [Drew J \(Jessica\)](#)
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 26 June 2017 11:30:47
Attachments: [image001.png](#)
[image003.png](#)

Jessica,
I have no comments on this application

*Val Ferguson
Policy Adviser
Ports and Harbours Branch
Aviation, Freight, Maritime & Canals Directorate
Area 2F North
Victoria Quay
Edinburgh
EH6 6QQ
0131 244 7878
val.ferguson@transport.gov.scot*

For agency and travel information visit our [website](#)

Transport Scotland, the national transport agency
Còmhdaill Alba, buidheann nàiseanta na còmhdaill

*Our logo may not display properly on some computer systems

From: Drew J (Jessica)
Sent: 26 June 2017 11:13
Cc: Humphries S (Sophie)
Subject: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

06347 – Moray East – Two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Sir/Madam,

The deadline for providing comments on the proposed works detailed below was **26th June 2017**. As the deadline has now passed please contact us immediately to arrange an extension to the consultation period should you wish to provide comments. If you have no comments to make please submit a “nil return” response.

If you require further information please let us know.

From: [Fiona Read](#)
To: [Drew J \(Jessica\)](#)
Cc: [Humphries S \(Sophie\)](#)
Subject: RE: Extension to CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.
Date: 11 July 2017 12:11:54

Hi Jessica and Sophie,

Sorry for the late reply to you regarding the MORL East Offshore Substation Platforms consultation . We are content with the proposed mitigation in the document and have no further comments.

Best wishes,

Fiona

Fiona Read
Policy officer
End Bycatch


[whales.org](#)

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 01 June 2017 07:28
To: Fiona Read
Cc: Catarina.Aires@gov.scot; Sophie.Humphries@gov.scot
Subject: Extension to CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Good morning Fiona,

Thank you for your email.

MS-LOT are happy to confirm an extension for this consultation until 7th July 2017.

Kind regards,

Jessica

From: Fiona Read [mailto:fiona.read@whales.org]
Sent: 31 May 2017 09:56
To: MS Marine Renewables
Subject: RE: CONSULTATION - Marine Licence Application for Moray Offshore Windfarm (East) Limited for two Offshore Substation Platforms for the consented Telford, Stevenson and MacColl Offshore Wind Farms.

Dear Jessica,

I am away for two weeks in June. Would it be possible to get an extension until 7th July for WDC's response, please?

Best wishes,

Fiona

Fiona Read