

Irvine S (Sophia)

From: Milne, Alasdair <alasdair.milne@SEPA.org.uk>
Sent: 31 October 2019 10:59
To: MS Marine Renewables
Subject: RE: Neart na Gaoithe - DSLP Consultation - Response required by 13 November 2019

Follow Up Flag: Follow up
Flag Status: Flagged

Sophia

Marc

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

Further to your consultation email of 16 October below regarding the submission of the EMP for the Neart na Gaoithe offshore windfarm.

I can confirm that SEPA has no objection to the discharge of these conditions and in this instance has no site-specific advice or comment to make.

I trust these brief comments are of assistance – please do not hesitate to contact me if you require any further information.

Regards
Alasdair

Alasdair Milne
Senior Planning Officer
Scottish Environment Protection Agency
Strathallan House
Castle Business Park
Stirling
FK9 4TZ

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From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 16 October 2019 10:20
To: sarah.macnab@nngoffshorewind.com
Cc: ewan.walker@nngoffshorewind.com; Sophia.Irvine@gov.scot; jessica.wilson@gov.scot
Subject: Neart na Gaoithe - DSLP Consultation - Response required by 13 November 2019

Dear Sir/Madam,

ELECTRICITY ACT 1989

Irvine S (Sophia)

From: Karen Taylor <Karen.Taylor@nature.scot>
Sent: 05 November 2019 12:11
To: MS Marine Renewables
Cc: Irvine S (Sophia); Wilson J (Jessica); MARINEENERGY
Subject: RE: Neart na Gaoithe - EMP Consultation - Response required by 13 November 2019

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sophia,

Neart na Gaoithe Offshore Windfarm Discharge of Conditions – Consent Plans

Thank you for your consultation on the 16th October 2019 on the Environmental Management Plan (EMP)(NNG-NNG-ECF-PLN-0006 Rev 2.0) submitted by Neart na Gaoithe Offshore Wind Limited (NnGOWL) in order to discharge consent conditions. The purpose of the EMP is provide the over-arching framework for on-site environmental management during construction and operation of the windfarm (but excluding decommissioning). We have reviewed the plan and offer the following comments.

Emphasis of the Plan

We note that the key emphasis of the plan covers the construction phase only, we would welcome further consideration to the handover and communication stages between the construction management team and the operations team (if there are changes to the personnel involved in these phases). Our reason for this is to ensure that lessons learned during construction are not lost and that any ongoing discussions between the pre, during and post construction stages and prior to commissioning are adequately explained and agreed with the operations team. As well as these communication aspects, we wish to see highlighted how those discussions that will help inform the monitoring during the operational phase are then relayed to the relevant team members going forward.

Marine Invasive Non-Native Species (INNS)

We are content that the relevant legislation and guidelines have been summarised as per Table 5-2, but highlight the additional need to ensure there is appropriate awareness of developing best practice regarding marine INNS control. We advise ongoing discussion between NnGOWL and Marine Scotland in this regard. Good practice should therefore be cited as a requirement of all contractors in adopting management measures to prevent the introduction of INNS. We advise paragraph 72, bullet point 1, should be amended as follows:

- Require that all Contractors adopt the relevant legislative **and good practice** requirements.

In line with this, paragraph 73, bullet point 4, should be amended as follows:

- A requirement for all submersible / immiscible equipment e.g., Remote Operated Vehicles (ROVs) (if required) to be subject to pre-use and post-use checks including checks for the presence of marine growth **following check-clean-dry principles**. All equipment will be required to be free of marine growth prior to mobilisation.

Further information can be found on Check Dry Clean on the GB Non-native Species Secretariat (NNSS) website, found here: <http://www.nonnativespecies.org/checkcleandry/>

Key Reporting Requirements

In reviewing the EMP, we recognise the background context and recommend that any reporting forms are also held in a section at the front with references to the sections they relate to. The document is long at over 100 pages and may not be that useful at the time of an emergency in finding the appropriate required actions including any reporting forms. We suggest this is considered further.

I trust this is of assistance,
Best wishes
Karen

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

From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]
Sent: 16 October 2019 10:20
To: sarah.macnab@nngoffshorewind.com
Cc: ewan.walker@nngoffshorewind.com; Sophia.Irvine@gov.scot; jessica.wilson@gov.scot
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Near na Gaoithe Offshore Wind Limited, having received consent under the above legislation, has submitted to Marine Scotland Licensing Operations Team (“MS-LOT”) an Environmental Management Plan (“EMP”) in order to satisfy condition 14 of the Section 36 consent (as varied), condition 3.2.2.10 of the Offshore Transmission Infrastructure Marine Licence (licence number: 06678/19/1) and condition 3.2.2.11 of the Generating Station Marine Licence (licence number: 06678/19/1) .

The Marine Licence, section 36, decision notices and conditions, as well as other relevant documents, can be found on our website, following the link below:

<http://marine.gov.scot/ml/near-na-gaoithe-offshore-windfarm-revised-design>

The conditions state that an EMP must be submitted to the Licensing Authority for their written approval following consultation.

We would appreciate any comments you may have on the proposed EMP, 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 **13 November 2019**. If you are unable to meet this deadline please contact MS-LOT on receipt of this email.

Kind regards,

Sophia