

From: Sarah.Canning@jncc.gov.uk
To: [Drew J \(Jessica\)](#)
Cc: [Catriona Gall](#)
Subject: RE: Consultation on MORL's Piling Strategy ("PS"), Revision 2.0 by 12th January 2017
Date: 12 January 2017 16:33:17
Attachments: [image001.jpg](#)
[image002.gif](#)
[image003.gif](#)
[image004.jpg](#)

Dear Jessica

Thank you for consulting JNCC with regard the revised piling strategy for MORL. We have discussed our current advice with SNH but as advice on this document was initially provided independently (please refer to letter of 24 February 2016), for consistency we have both opted to do the same for the revised document.

We have no comments to make on the revisions identified in the piling strategy document provided. We note no fundamental changes have been made to the basic mitigation methodology other than the introduction of information regarding a phased mitigation approach in line with that agreed for the neighbouring BOWL project. We look forward to receiving the detailed ADD method statement once the ADD operators have been appointed (p43).

We would like to highlight the following points regarding Appendix 7, Phased Piling Mitigation Strategy:

We acknowledge MORLs intention to undertake a phased mitigation approach in line with that agreed for the neighbouring BOWL project. This will add to the evidence base regarding the effectiveness off ADDs as a mitigation tool.

Section 6, Reporting, states that MORL propose to report to MS-LOT and MSS on a weekly basis regarding the phased mitigation procedures and summarise any marine mammal observations made. We request that these reports are shared with the rest of the MFRAG-marine mammal sub-group if possible.

Further to this, MORL propose a meeting with MS-LOT and MSS no later than three working days before the end of Stage 2 of the phased mitigation period to review the data collected to date and the summary report. We again suggest this meeting could include the MFAG-marine mammal sub group if deemed appropriate.

Please do not hesitate to contact me with any questions regarding the above comments.

Yours sincerely,

Dr Sarah Canning
Offshore Industries Advisor
PhD, BSc (Hons)
Joint Nature Conservation Committee
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MORAY OFFSHORE RENEWABLES: OFFSHORE WIND FARM, MORAY FIRTH - PILING STRATEGY - DECEMBER 2016 – MARINE SCOTLAND SCIENCE COMMENTS

Marine Scotland Science (MSS) has reviewed the submitted piling strategy and has provided the following comments.

marine mammals

MSS welcome the opportunity to review the revised piling strategy. We are content with the strategy, including the phased mitigation strategy which has been developed in consultation with the MFRAG.

ornithology

MSS has no comments to make regarding ornithology.

marine fish ecology

MSS is content with the Piling Strategy with regards marine fish species. The document addresses the requirements of consent conditions for species of concern and incorporates the relevant mitigation related to piling, as identified within the ES and during consultation on the application and supporting information.

Section 3.5.1.1 relates to potential seasonal restrictions for herring, the requirement of which will be based on herring surveys that MORL has committed to undertake. The document highlights that the details of the scope of surveys and assessment will be presented within the PEMP. MSS look forward to reviewing the PEMP document and any results of the herring survey work.

commercial fisheries

MSS has no comments to make regarding commercial fisheries.

benthic ecology

MSS has no comments to make regarding benthic ecology.

physical environment

MSS has no comments to make regarding physical environment.

aquaculture

MSS aquaculture planning has no specific comments to make on the Offshore Wind Farm, Moray Firth - Piling Strategy Revision 2. It should however be noted that since the comments made on 24/02/2016 in response to the Project 1 Piling, there are two further proposed shellfish sites within the Dornoch Firth. These sites were granted planning permission in 2016 but may not yet have authorisation to place any equipment in the water.

diadromous fish

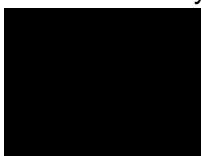
The matter raised in the first diadromous fish comment in the comments spreadsheet that there is “a need to ensure that there will be appropriate provision to allow the arrangements to be reviewed as new information relevant to risk assessment comes to hand, including for example on actual rather than predicted underwater noise levels, or on the use of the development area by salmon and sea trout, or on the extent to which their behaviour will be affected by the sound levels which will occur”, still needs to be fully addressed in the strategy. This did not just refer to the situation where new information from noise monitoring shows that the actual levels are higher than those predicted, which has been addressed, but to any important new information relevant to risk assessment on any important diadromous fish species, and needs to apply to both salmon and sea trout, even though sea trout were not specifically named in the consent conditions.

socio economics

MSS has no comments to make regarding socio economics.

Hopefully these comments are helpful to you. If you wish to discuss any matters further contact the MSS Renewables in-box MS_Renewables@scotland.gsi.gov.uk.

Yours sincerely



Paul Stainer

Marine Scotland Science

20 January 2017

From: [Catriona Gall](#)
To: [Drew J \(Jessica\)](#)
Cc: [Sarah.Canning@jncc.gov.uk](#)
Subject: RE: Consultation on MORL's Piling Strategy ("PS"), Revision 2.0 by 12th January 2017
Date: 12 January 2017 15:58:53

Dear Jessica,

Thank you for sending SNH this consultation. As indicated in the comments log, we did not raise any outstanding concerns about MORL's piling strategy – please see our advice of 23 February 2016.

We therefore have no comments to provide on the updated strategy, other than to welcome the further information MORL have provided on ADD deployment and phased mitigation.

Please get back to me if you require anything else from SNH on this. While we've discussed it with JNCC, we're each responding separately as we provided separate advice to the original consultation last year.

Yours sincerely,

Catriona Gall

Marine Renewables Casework Adviser - Offshore Wind

SNH
Battleby
Redgorton
Perthshire
PH1 3EW

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 15 December 2016 11:15
To: jnccadvice@jncc.gov.uk; MARINEENERGY; Sarah.Canning@jncc.gov.uk; Erica Knott; sarah.dolman@whales.org; fiona.read@whales.org; MS_Renewables@gov.scot; Paul.Stainer@gov.scot
Cc: Catarina.Aires@gov.scot; Nicola.Bain@gov.scot
Subject: Consultation on MORL's Piling Strategy ("PS"), Revision 2.0 by 12th January 2017

Dear Sir/Madam,

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000

MARINE (SCOTLAND) ACT 2010

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

MS LOT have received MORL's Piling Strategy ("PS"), Revision 2.0, issued on 08/12/2016 together with tracked-changes documents and a comments log detailing the amendments made by Revision 2.0 of the PS since it was initially consulted upon in January 2016. At this point the PS did not

From: [REDACTED]
To: [MS Marine Renewables](#)
Cc: [REDACTED]
Subject: RE: Consultation on MORL's Piling Strategy ("PS"), Revision 2.0 by 12th January 2017
Date: 12 January 2017 15:45:39

Dear Jessica,

Thank you for providing WDC the opportunity to provide comments on MORL's Piling Strategy Revision 2. We are happy that the Piling Strategy satisfies the requirements of Condition 11 of Section 36 consents for Project 1.

As requested in previous correspondence, WDC would welcome involvement in the development of the Environmental Management Plan and the Project Environmental Monitoring Plan.

Best wishes,

[REDACTED]

[REDACTED]
Policy officer
End Bycatch

Telephone: [REDACTED]
[whales.org](#)

From: Jessica.Drew@gov.scot [mailto:Jessica.Drew@gov.scot]
Sent: 15 December 2016 11:15
To: jnccadvice@jncc.gov.uk; marineenergy@snh.gov.uk; Sarah.Canning@jncc.gov.uk; Erica.Knott@snh.gov.uk; Sarah Dolman; Fiona Read; MS_Renewables@gov.scot; Paul.Stainer@gov.scot
Cc: Catarina.Aires@gov.scot; Nicola.Bain@gov.scot
Subject: Consultation on MORL's Piling Strategy ("PS"), Revision 2.0 by 12th January 2017

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During the initial consultation comments were requested from the JNCC, SNH, WDC and MSS. MS LOT would like to invite JNCC, SNH, WDC and MSS to comment again on the revised PS.

Due to the size of the documents received, please follow this [link](#), to access the documents.

The purpose of the revised PS is to attempt to satisfy the requirement of condition 11 of Section 36 consents, awarded to MORL in March 2014, in respect of the first phase of development of the Telford, Stevenson and MacColl Wind Farms, referred to as Project 1.

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