# Moray West Offshore Wind Farm and Offshore Transmission Infrastructure (OfTI)

# **Pre-application Consultation (PAC) Report**

This Pre-application Consultation (PAC) Report has been prepared in accordance with requirements of the Marine Licencing (Pre-application Consultation) (Scotland) Regulations 2013 in support of an application for a Marine Licence for the Moray West Offshore Transmission Infrastructure (OfTI) components of the Moray West Offshore Wind Farm.

# 1. Proposed Licensable Marine Activity

Please describe below or, where there is insufficient space, in a document attached to this form the proposed licensable marine activity, including its location

Moray Offshore Windfarm (West) Limited (known as Moray West) are proposing to develop the following licensable marine activities/project; Moray West Offshore Wind Farm and Offshore Transmission Infrastructure (OfTI). Maps showing the location of the Offshore Wind Farm and OfTI are presented in **Appendix A**.

The Moray West Offshore Wind Farm will comprise up to 85 Wind Turbine Generators (WTGs), associated substructures and seabed foundations, inter-array cables and any scour protection around substructures or cable protection. The OfTI comprises up to two Offshore Substation Platforms (OSPs) which will be located within the Moray West Site, OSP interconnector cables and two offshore export cable circuits which will be located within the Offshore Export Cable Corridor and will be used to transmit the electricity generated by the offshore wind farm to shore. The offshore export cable circuits come ashore in the Landfall Area which is located on the Aberdeenshire Coast between Findlater Castle and Redhythe Point, approximately 65 km south of the Moray West Site.

The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013 apply to all licensable marine activities (as defined under the Marine (Scotland) Act 2010) within Scottish marine area, the area of sea within the seaward limits of the territorial sea (0 – 12 nautical miles [nm]). Given that Scottish marine area only extends to 12 nm, any infrastructure which lies beyond 12 nm is not subject to the requirements of the PAC Regulations. This includes the Moray West Offshore Wind Farm (WTGs, substructures and inter-array cables) and the OfTI OSP(s) and OSP interconnector cables. This PAC Report therefore focuses on the activities undertaken with respect to components of the OfTI located between MHWS and 12 nm; the offshore export cable circuits and landfall infrastructure located below MHWS.

# 2. Applicant Details

Title	Initials	Surname
Ms	S	Edwards

Trading Title (if appropriate)

Moray Offshore Windfarm (West) Limited
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Δ	h	Ч	re	ςς

4th floor, 40 Princes Street, EH2 2BY, Edinburgh  Name of contact (if different)  n/a  Position within Company (if appropriate)  Offshore Consents Manager  Telephone No. (inc. dialling code)  Fax No. (inc. dialling code)  n/a  Company Registration No.  10515140		
n/a  Position within Company (if appropriate)  Offshore Consents Manager  Telephone No. (inc. dialling code)  Fax No. (inc. dialling code)  n/a  Company Registration No.		
n/a  Position within Company (if appropriate)  Offshore Consents Manager  Telephone No. (inc. dialling code)  Fax No. (inc. dialling code)  n/a  Company Registration No.		
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n/a Company Registration No.		
Company Registration No.		
Company Registration No.		
10515140		
10313140		
Email		
Sarah.Edwards@edpr.com		

Is this prospective applicant the proposed licensee?

No

If NO, please complete Section 3 below.

# 3. Proposed Licensee Details

Title	Initials	Surname
Mr	D	Finch

Trading Title (if appropriate)

Moray Offshore Windfarm (West) Limited	
initial district triniaranin (trest, zinneca	

# Address

4th floor, 40 Princes Street, EH2 2BY, Edinburgh

Name of contact (if different)

n/a

Position within Company (if appropriate)

**Managing Director** 

Telephone No. (inc. dialling code)

+44 (0) 131 718 3556

Fax No. (inc. dialling code)

n/a

Company Registration No.

10515140

**Email** 

Dan.Finch@edpr.com

# 4. Pre-application Consultation Event

Please describe below or, where there is insufficient space, in a document attached to this form the pre-application consultation event

The Pre-application consultation (PAC) event for the sections of the OfTI located within 12 nm (export cable circuits and landfall up to MHWS) was held on 15<sup>th</sup> January 2018 at the Station Hotel in Portsoy, Aberdeenshire from 12 noon to 8 pm.

Notification of the event was advertised in the Press and Journal six weeks in advance on the 30<sup>th</sup> November 2017 and advertised more locally in the Banffshire Journal on the 9<sup>th</sup> January 2018 (see **Appendix B**). The Maritime and Coastguard Agency (MCA), Northern Lighthouse Board (NLB), Scottish Natural Heritage (SNH) and Scottish Environment Protection Agency (SEPA) were all notified of the event by letter on the 30<sup>th</sup> November 2017 (see **Appendix B**).

Moray West staff were present to greet, introduce the project proposals, explain the marine licence application process, answer any questions and outline how feedback could be provided at this point and later in the marine licensing process. Pop-up Display Boards (**Appendix C**) and Leaflets/Feedback Forms (**Appendix D**) were used to communicate information about the proposal and its components as well as explain where more information could be obtained and how to provide feedback.

# 5. Information provided by the Prospective Applicant at the Pre-application Consultation Event

Please provide below or, where there is insufficient space, in a document attached to this form details of any information provided by the prospective applicant for a marine licence at the preapplication consultation event

Pop-up display boards (**Appendix C**) and Leaflets (**Appendix D**) were used to communicate information about the proposed project.

# 6. Information received by the Prospective Applicant at the Pre-application Consultation Event

Please provide below or, where there is insufficient space, in a document attached to this form details of any comments and objections received by the prospective applicant for a marine licence at the pre-application consultation event

There were approximately 62 people at the PAC event in Portsoy on the 15<sup>th</sup> January 2018. The attendees were mainly composed of local residents and landowners. The main comments received from people attending the PAC event at Portsoy where in relation to the location of the landfall. Most people were of the view that, while the landfall location had not been officially confirmed as Sandend Beach, it is the most obvious location for the landfall as it is the only large sandy beach along the entire section of coast within the Area of Search.

Significant concerns were raised over the potential use of Sandend Beach as the landfall location. These concerns related to the following:

- Disrupted/reduced access to beach for recreational purposes during installation of cables;
- Damage to beach and sand dunes at the back of the beach during installation of cables;
- Disrupted/reduced access to beach for surfing activities;
- Reduced access to main surf area / waters within Sandend Bay;
- Long-term impacts on the quality of the surf (wave height and frequency) due to the presence of cables on the seabed within the bay;
- Potential effects on sea level and increased risk of flooding due to the presence of the cables within Sandend Bay;
- Risk of the cables becoming exposed long term both on the beach and in the bay; and
- General concerns over long term quality of the beach and impacts on the amenity value of the beach and surrounding area.

These concerns were acknowledged by the Moray West team, who explained that while a final location for the landfall had not been determined, the concerns raised with regards to the use of Sandend Beach as a landfall location would be taken into account in determining the final landfall location. The Moray West team also confirmed that concerns relating to physical effects of the export cables on the quality of the surf in Sandend Bay would be assessed in detail on the Offshore EIA Report (See Volume 2 of the Offshore EIA Report - Chapter 6: Physical Processes and Water Quality) and that potential effects on the surfing community in terms of access to the beach for surfing activities and direct impacts on the local surf school would be assessed as part of the Socio-Economics, Recreation and Tourism assessment (Offshore EIA Report – Volume 2: Chapter 15).

Other comments received on the export cable corridor were limited and focused primarily on concerns of the potential effects of cable installation activities and presence of the cable on inshore fisheries, in particular the creel fishing fleet. The main concern shared by fishermen attending the event was in relation to displacement from creel grounds along the export cable

corridor and within the Landfall Area and increased risk of potential conflict with squid fisheries which are also increasing targeting nearshore waters.

Questions and comments at the Portsoy PAC event were received by the Moray West team via face to face discussions but also through attendees completing feedback forms (which were part of the PAC Event Leaflets). The majority were received at the PAC event and only one was received after the event had taken place. Responses to specific questions/comments received during and after the Portsoy PAC event and further actions taken are described in **Appendix E**.

7. Amendments made, or to be made, to the Application for a Marine Licence by the Prospective Applicant following their Consideration of Comments and/or Objections received at the Preapplication Consultation Event

Where any amendments are made, or are to be made, by the prospective applicant for a marine licence to the marine licence application as a direct result of their consideration of comments and/or objections received at the pre-application consultation event, please provide below or, where there is insufficient space, in a document attached to this form details of such amendments

Responses to specific questions/comments received during and after the Portsoy PAC event and further actions taken are outlined in **Appendix E**.

Further public engagement event(s) were organised and details of these/this are provided in **Appendix F**.

8. Explanation of Approach taken by the Prospective Applicant where, following Relevant Comments and/or Objections being received by the Prospective Applicant at the Preapplication Consultation Event, no Relevant Amendment is made to the Application for a Marine Licence

Where, following comments and/or objections having been received by the prospective applicant for a marine licence at the pre-application consultation event, no relevant amendment is made to the application for a marine licence by the prospective applicant, then please provide below or, where there is insufficient space, in a document attached to this form an explanation for the approach taken

Responses to specific questions/comments received during and after the Portsoy PAC event and further actions taken are provided in **Appendix E**.

Further public engagement event(s) were organised and details of these/this are provided in **Appendix F**.

# **CERTIFICATION**

Insert Name	Sarah Edwards
Insert Address	Moray Offshore Windfarm (West) Limited
	4th floor, 40 Princes Street
Town	Edinburgh
County	
Postcode	EH2 2BY

I certify that I have complied with the legislative requirements relating to pre-application consultation and that the pre-application consultation has been undertaken in accordance with the statutory requirements.

31/05/18



# **Appendices**

Appendix A – Moray West Offshore Wind Farm and Offshore Transmission Infrastructure Maps

Appendix B – PAC Event Public Notices / Newspaper Adverts and Statutory Consultee Notifications

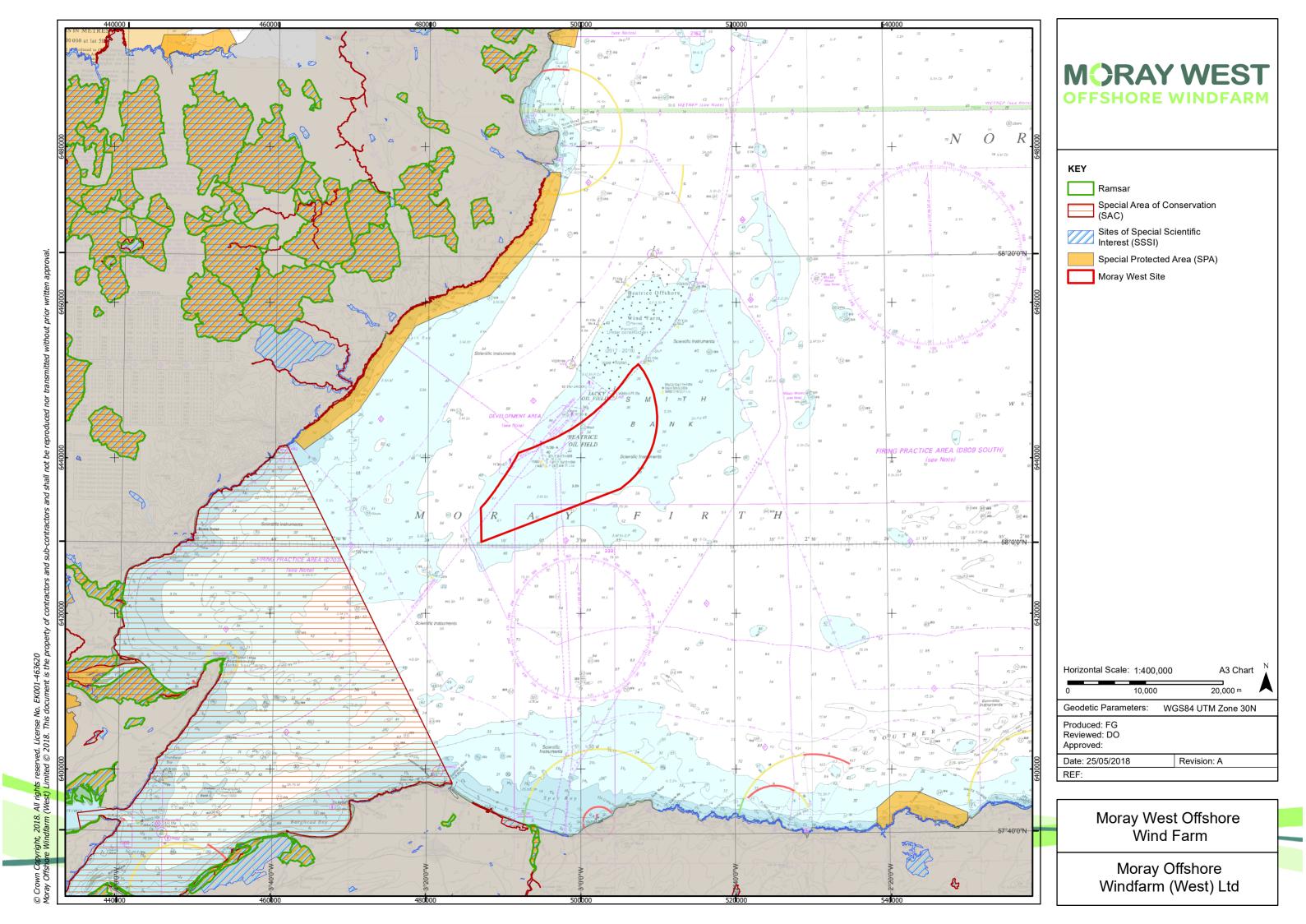
Appendix C – PAC Event Pop-up Display Boards

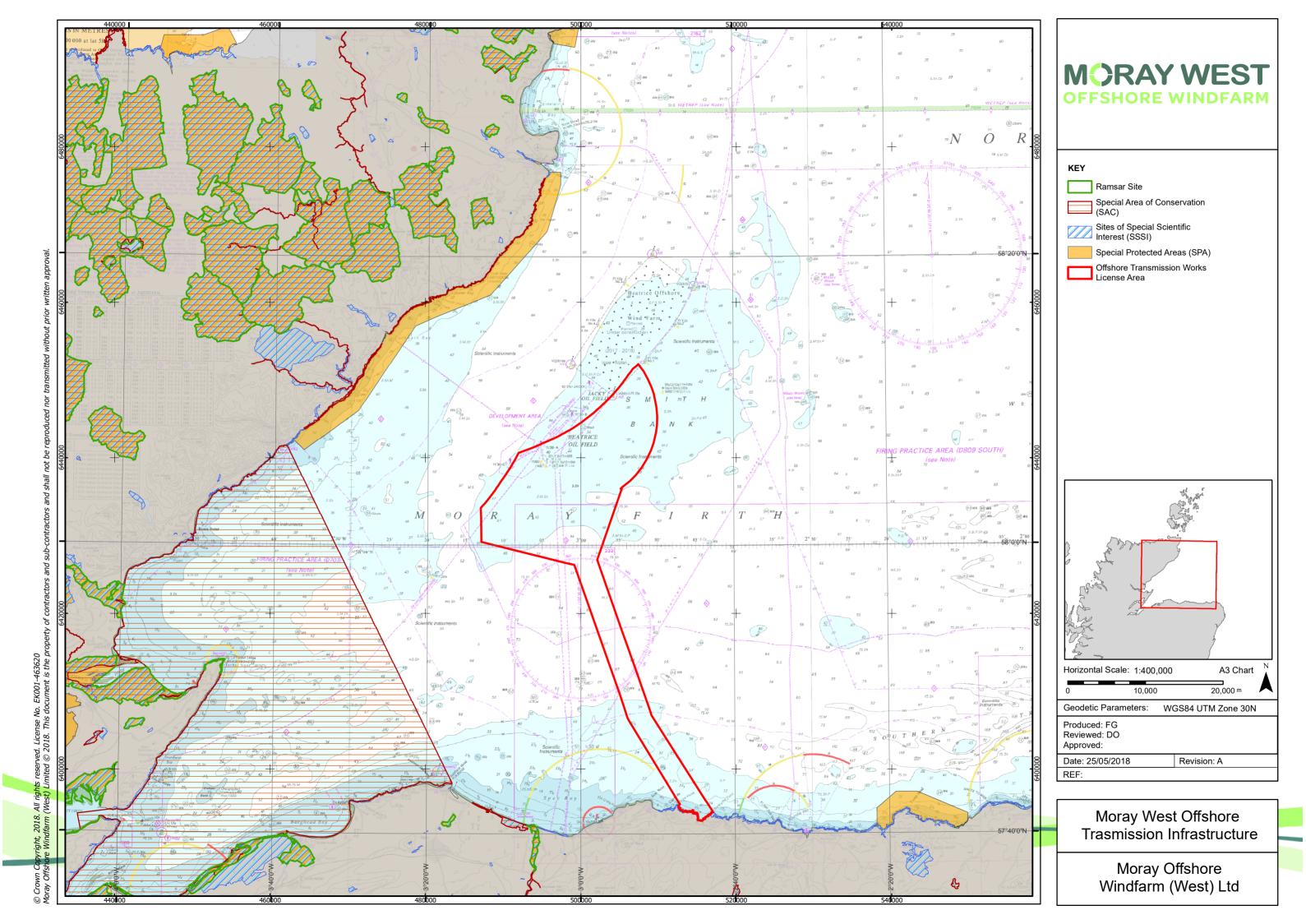
Appendix D – PAC Event Leaflet / Feedback Form

Appendix E – Responses to Specific Questions/Comments

Appendix F – Additional Consultation Events

Appendix A – Moray West Offshore Wind Farm and Offshore Transmission Infrastructure Maps





Appendix B – PAC Event Public Notices / Newspaper Adverts and Statutory Consultee Notifications

# otice Board

Public Notices

Moray Offshore Windfarm (West) Limited Marine (Scotland) Act 2010 The Marine Licence (Pre-application Consultation)

Notice is hereby given that Moray Offshore Windfarm (West) Limited (company number 10515140) plans to hold a pre-application consultation event regarding a proposed floensable marine activity between 0 – 22km off the Moray coast, central grid reference: UTM 30N 19884. The activity consists of the deposit of up to two submarine cables within the Scottish marine area either on or under the seabed and crossing the inter-tidal boundary to a shoreline landfall location. The cables form part of the associated offshore transmission finitastructure for the Mortay West Offshore Wind Farm connecting the wind (Scotland) Regulations 2013 farm to the Moray West onshore transmission infrastructure.

Further information, can be obtained from: www.moraywest.com

The pre-application consultation event will be held at the Station Hotel 22 Seaffeld St, Portsoy, Banff AB45 2QT on 15 January 2018 from 12pm - 8 pm

Persons wishing to provide comments on the proposed submarine cable development can do so by writing to the applicant at:

info@moraywest.co.uk or by post to:

Moray Offshore Windfarm (West) Limited, 4th Floor, 40 Princes Street, EDINBURGH

either case not later than 22 January 2018.

Comments should be dated and should clearly state the name and full return email or postal address of those making comment. Comments made to the applicant are not representations to the Marine Scotland Licencing Operations Team (MS-LOT). If Moray West Offshore Wind Farm submits an application for a marine licence to MS-LOT, an opportunity will be given for representations to be made to the Scottish Ministers on the application.

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Planning & Development Team SEPA Inverdee House Baxter St ABERDEEN AB11 9QA

30 November 2017



Dear Sir/Madam

Moray West - Consultation On Marine Licenceable Activity - Deposit of Submarine Cables

I write to advise that Moray Offshore Windfarm West Limited (known as Moray West) will hold a preapplication consultation event for a proposed marine licensable activity between 0 – 22km off the Moray coast, central grid reference: UTM 30N 19884. The activity consists of the deposit of up to two submarine cables within the Scottish marine area either on or under the seabed and crossing the inter-tidal boundary to a shoreline landfall location. The cables form part of the associated offshore transmission infrastructure for the Moray West Offshore Wind Farm connecting the wind farm to the Moray West onshore transmission infrastructure.

Further information, can be obtained from: <a href="www.moraywest.com">www.moraywest.com</a>, and is included in the Moray West Offshore Transmission Infrastructure Scoping Report which was previously circulated. (further copies available on request).

Under the terms of the regulations, this consultation only concerns proposed infrastructure within 22km and is therefore restricted to consideration of the submarine cables described above.

The pre –application consultation event will be held on 15 January 2018 at the Station Hotel, 22 Seafield St, Portsoy, Banff, AB45 2QT. I enclose a copy of the press notice for this event for your information.

Yours sincerely



elephone: (01261) 812551

THE BANFFSHIRE JOURNAL Tuesday, January 9, 2018 7

"S CHILD'S PLAY FOR SUPERMARKET TOY DONATIONS



Banff's Tesco store donated toys to Home-Start Deveron and The Harvest Centre appeal just bef to-ordinator of the charity received them from Tesco community champion Sheena Sutherland.

# Milestone for Portsoy SNP group

THE 50th anniversary of the Portsey branch of the Scottish I National Party is to be marked on V. Friday, February 9.

The celebrations will include a dinner, along with speakers from the party who have risen to its very pinnacle.

A spokeswoman said: "Those peakers are former First

**MORAY WEST OFFSHORE WINDFARM** 

TRANSMISSION INFRASTRUCTURE PUBLIC

CONSULTATION EVENT

Minister Alex Salmond, Kirsty Black MP, former MP Dr Eilidh Whiteford and MSP Stewart

Stevenson.
All have close connections to
Portsoy branch and the North
East in general.
"Part of the evening will
include a presentation from one
of the branch's original members

who is still an active committee member, John Stewart.

"Mr Stewart's dedication and commitment to the party have been nothing but exemplary."

The dinner will be held in The Station Hotel. Tickets and inquiries to marionphilip@
hotmall.co.uk or fiona.murray@
s homecall.co.uk

# Appeal

WEL Cancer UK is look for local work places and

ening test was reitin the post.

Anwel cancer is the third cancer in cancer in

However, bowel cancer is treatable and curable espe-cially if diagnosed early. Nearly everyone diag-nosed at the earliest stage nd dying each year of sease and 3700 people

ple and any other place that has an existing group or charity, is can book online at bowel-termeal scotadninghowelcan-termels constantinghowelcan-termels corructorguich or call 0131 281 e 7351.



In 2016 consultation commenced on proposals for the Moray West Offshore Windfarm (adjacent to the planned 950MW Moray East Offshore Windfarm) in the outer Moray Firth, 22km from shore.

Proposals are now being developed for the transmission

infrastructure which will be required to take the electricity from the

offshore windfarm to a proposed new substation at Blackhillock.

This will include the installation of submarine cable offshore within

If your employees of a community group would like to have an awareness talk, don't delay, get in touch now."

Comments should be dated and should clearly state the name and full return email or postal address of those making comment. Comments made to the applicant are not representative to the Marine Scotland Licencing Operations Team (MS-LOT). If Moray West Offshore Wind Farm submits an application for a marine licence to MS-LOT, an opportunity will be given for representations to be made to the Scottish Ministers on the application. Price Match Guarantee®
Decora guarantee the lowest price on all our letchers and affirmation ranges or we will match any difference, unlike any affirmation ranges or we will match any difference, unlike any set of the competitions. So you're always going to D.I.Y for less. adore your home OPEN: Mon - Fri: 9am - 7pm, Sat: 9am - 6pm, Sun: 10am - 5pm Free Planning

Moray Offshore Windfarm (West) Limited, 4th Floor, 40 Princes Steet, EDINBURGH, EH2 2BY

info@moraywest.co.uk or by post to:

Persons wishing to provide comments on the proposed development can do so by writing to the applicant at:

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consultation event: Monday 15 January (12pm – 8pm) The Station Hotel, 22 Seafield St, Portsoy, Banff

Your views are sought on these proposals at a public

the Scottish Marine Area.



Mr Nick Salter Maritime & Coastguard Agency 105 Commercial St Southampton SO15 1EG

30 November 2017



Dear Mr Salter,

# Moray West - Consultation On Marine Licenceable Activity - Deposit of Submarine Cables

I write to advise that Moray Offshore Windfarm West Limited (known as Moray West) will hold a preapplication consultation event for a proposed marine licensable activity between 0 – 22km off the Moray coast, central grid reference: UTM 30N 19884. The activity consists of the deposit of up to two submarine cables within the Scottish marine area either on or under the seabed and crossing the inter-tidal boundary to a shoreline landfall location. The cables form part of the associated offshore transmission infrastructure for the Moray West Offshore Wind Farm connecting the wind farm to the Moray West onshore transmission infrastructure.

Further information, can be obtained from: <a href="www.moraywest.com">www.moraywest.com</a>, and is included in the Moray West Offshore Transmission Infrastructure Scoping Report which was previously circulated. (further copies available on request).

Under the terms of the regulations, this consultation only concerns proposed infrastructure within 22km and is therefore restricted to consideration of the submarine cables described above.

The pre –application consultation event will be held on 15 January 2018 at the Station Hotel, 22 Seafield St, Portsoy, Banff, AB45 2QT. I enclose a copy of the press notice for this event for your information.

Yours sincerely



Moray Offshore Windfarm West Ltd



84 George St EH2 3DA **EDINBURGH** Mr Archie Johnston Northern Lighthouse Board

30 November 2017



tation on marine Licenceable Activity – Deposit of Submarine Cables

Further information, can be obtained from: www.moraywest.com, and is included in the Moray West Offshore shoreline landfall location. The cables form part of the associated offshore transmission infrastructure for the Transmission Infrastructure Scoping Report which was previously circulated. (further copies available on Moray West Offshore Wind Farm connecting the wind farm to the Moray West onshore transmission infrastructure.

cables within the Scottish marine area either on or under the seabed and crossing the inter-tidal boundary to a

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Yours sincerely

Moray Offshore Windfarm West Ltd

Moray Offshore Windfarm (West) Ltd 4th Floor, 40 Princes St, EDINBURGH EH2 2BY T: +44 (0) 131 556 7602

www.moraywest.com

Registered Office: 14/18 City Road, Cardiff, United Kingdom CF24 3DL Registered Company in England and Wales Company Number 10515140



Ms Catriona Gall Scottish Natural Heritage Battleby Redgordon Perthshire PH1 3EW



30 November 2017



Moray West - Consultation On Marine Licenceable Activity - Deposit of Submarine Cables

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Moray Offshore Windfarm (West) Ltd 4<sup>th</sup> Floor, 40 Princes St, EDINBURGH EH2 2BY

T: +44 (0) 131 556 7602

Appendix C – PAC Event Pop-up Display Boards



# **Onshore Transmission Infrastructure Consultation**

In order to convey the electricity generated by the proposed Moray West offshore windfarm to the National Grid, new onshore infrastructure is required including:

- An underground cable landfall site at the coast
- Onshore underground cable circuits, to send power to the National Grid.
- A new electricity substation in the vicinity of Blackhillock. A study area, very much larger than is required for the new infrastructure has been identified. Your views are sought in refining the cable route and substation within this area.



www.morayoffshore.com

# MCRAY WEST OFFSHORE WINDFARM

# **Environmental Impact Assessment Consultation**

Environmental Impact Assessment (EIA) is a procedure that must be followed for certain developments before they can be granted planning permission. It assesses a development's potential environmental effects and identifies measures to enhance or reduce them depending on whether they are positive or negative. This helps to ensure that interested parties, including the public and relevant determining authorities, fully understand the effects before a decision is made on a planning application.

An EIA of the Onshore Transmission Infrastructure is currently underway focussing on the following:

- Landscape and visual effects;
- Ecology;
- Archaeology and cultural heritage;
- Hydrology, hydrogeology and geology;
- Traffic and transportation;
- Noise; and
- Socio-economics.

Your views are sought on the matters which should be assessed as part of the Environmental Impact Assessment.

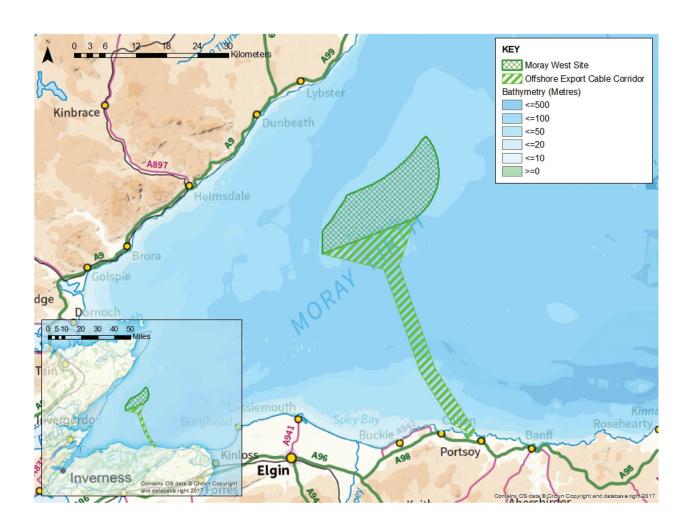


# MCRAY WEST OFFSHORE WINDFARM

# **Developing Moray West**

In 2010 we were awarded the rights to develop offshore wind in a zone determined by the Crown Estate. At that time, there were fewer constraints to development in the east of the zone than the west, so the zone was split and Moray East was developed first. Moray East secured consent in 2012 and won a Contract for Difference (enabling the electricity generated to be sold, and thus for 950MW in 2017. This will supply the average electricity needs of 950, 000 households annually.

By 2016, the constraints facing the west of the zone had eased, as human activities in the area (military and oil and gas) changed, and consultation began on proposals to develop Moray West offshore windfarm.



www.morayoffshore.com

# Appendix D – PAC Event Leaflet / Feedback Form

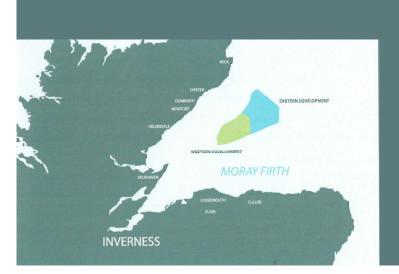
Your comments are invited on these proposals by 5 Feb.2018 Please use the enclosed tear off slip and return to: Moray West, 4th Floor, 40 Princes St, EDIN BURGH EH2 2BY Your comments are invited on: 1. The development of offshore wind generation in the Moray Firth : 2. The location of the proposed export corridor and landfall: 3. Method of export cable installation and planned works: 4. Accessibility of the Consultation Event and Information provided: 5. Any other Comments:



# OFFSHORE RENEWABLE POWER Tel. 0131556 7602, c/o EDPR UK Ltd, 4th Floor, 40 Princes St, Edinburgh, EH2 2BY

Email .....

# MCRAY WEST OFFSHORE WINDFARM



# Offshore Submarine Export Cable Consultation

# **Development of Moray East and Moray West**

In 2010, after winning the rights in the Moray Firth, Zone 1 (set by the Crown Estate) was divided into two, to allow the less-constrained Moray East offshore wind farm to be developed first. Moray East was awarded consent by the Scottish Government in 2014, and won a 950MW 'Contract for Difference' (the vital contract which will allow the project to progress to construction) in 2017.

Meantime, human activities in the west (predominantly military and oil and gas) changed, and constraint to development eased. Development of Moray West began in 2016, when an Environmental Impact Assessment (EIA) scoping report was published with proposals for an offshore wind farm comprising up to 90 turbines. It is intended that applications for the consents to construct and operate the Moray West Offshore Wind Farm will be submitted to Scottish Ministers in early 2018.





# **Offshore Submarine Export Cable**

within the Offshore Export Cable Corridor.

nal damage, and material to keep the cables watertight.

## **Cable Installation**

The cables will be buried below the seabed wherever possible, typically to a depth of 1 m. However, depending on seabed conditions within the export cable corridor the cables may be buried up to depths of 3 m. The cables are likely to be installed using one of two techniques (or possibly a combination of both depending on seabed conditions). These include jet trenchers, which use water jets to soften the sediment allowing the cables to sink into the seabed, or ploughing, where a plough tool is pulled along the seabed to create a trench for the cable to be lowered into from the cable installation vessel

In areas where burial of the cable in the seabed is not possible (due to seabed conditions or presence of other obstructions) other forms of cable protection may be reguired. These are likely to include measures such as rock placement (graded pieces of stone or rock placed on and around the cables); concrete mattresses (articulated concrete blocks which are linked by a polypropylene rope lattice and placed over the cables); grout bags and/or the installation of a cable protection system (CPS) around the

The offshore export cable circuits will transfer power from If rock placement, mattressing or grout bags are used to the wind farm to a landfall location in the vicinity of protect cables, they are typically used to construct a berm Sandend Bay. Two export cable circuits will be installed on the seabed on top of the cable. Such berms would be up to 3 m wide and up to 1.5 m high above the seabed.

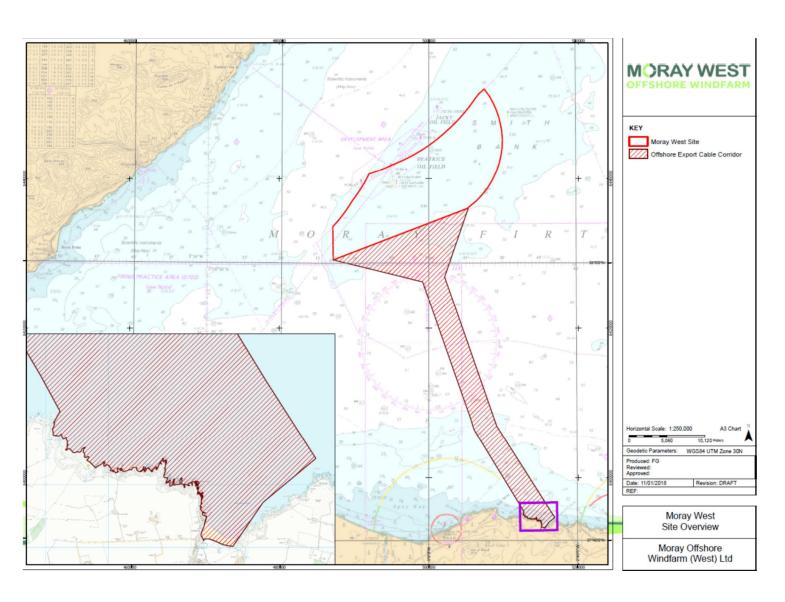
The export cables will be made up of a number of conduc- At the landfall, the cables will be installed using one of two tor cores, usually made from copper or aluminium. These methods. These include the open cut trench technique will be surrounded by layers of insulating material as well which involves cutting a trench across the beach between as material to armour the cables for protection from exter- Mean Low Water Spring (MLWS) and Mean High Water Spring (MHWS). Once the cable has been placed in the trench, the trench will then be backfilled and the beach returned to its previous state. The other option is a technique called Horizontal Directional Drilling (HDD) which involves drilling a duct beneath the beach (or rocks / cliffs depending on the location of the final landfall). The cable is then pulled through the duct for connection to the onshore

The offshore submarine cable infrastructure will be located within the corridor indicated on the map above, whose central grid reference is UTM 30N 19884, and lies within the Scottish Marine Area, 0 22km from the Moray coast. The infrastructure will only occupy a small part of the corridor which is considerably wider in order to allow flexibility in the design of the final cable route.

The deposit of the submarine export cable circuits and associated works within the Scottish Marine Area constitutes a marine licensable activity under the Marine (Scotland)

This consultation seeks your views on the proposed offshore submarine export cables. Space for responses is provided overleaf. Alternatively proposal may be viewed online at www.moraywest.com

# **Location Of Offshore Submarine Cable Corridor**



Persons wishing to provide comments on the proposed submarine export cables can do so by writing to the applicant at:

info@moraywest.co.uk or by post to: Moray Offshore Windfarm (West) Limited, 4th Floor, 40 Princes Street, EDINBURGH, EH2 2BY

In either case not later than 5 February 2018.

Comments should be dated and should clearly state the name and full return email or postal address of those making comment.

Comments made to the applicant are not representations to the Marine Scotland Licencing Operations Team (MS-LOT). If Moray West Offshore Wind Farm submits an application for a marine licence to MS-LOT, an opportunity will be given for representations to be made to the Scottish Ministers on the application.

# **Appendix E – Responses to Specific Questions/Comments**

The following table provides a summary of the main questions/comments raised during and after the Portsoy PAC event via face to face discussions and through submission of feedback forms. The table also provides Moray West's responses to those questions/comments and actions taken to address specific concerns. It should be noted that where PAC event attendees asked similar questions or made similar comments, these have been collated and are reported below as a single question/comment with a response to that specific question/comment.

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West
Where will the cables be brought ashore?	Moray West are still to determine the final location for the landfall. This is to be informed by more detailed engineering and environmental studies.	Following the PAC event and concerns raised over the lack of clarity regarding the location of the proposed landfall, Moray West expanded the area
Limited locations along the coast except Sunnyside Bay and Sandend – will the landfall be one of these locations?	Moray West are still to determine the final location for the landfall. Sunnyside Bay was initially considered as a possible option. However, the presence of high, steep cliffs at the back of the beach present a potential technical challenge to bringing the cables ashore at this location.	of search. This area under consideration for a landfall location is now referred to as the Landfall Area which is the area included in both the Marine Licence and PPiP applications. This refined Landfall Area extends east from Findlater Castle to Redhythe Point. It includes Sandend Bay but does not include
What are the reasons for not bringing the cables ashore at Sunnyside Bay?	The presence of high, steep cliffs at the back of Sunnyside beach present a potential technical challenge to bringing the cables ashore at this location.	Sunnyside Bay. A final landfall location within the Landfall Area will be identified after more detailed engineering survey investigations have taken place
Has Moray West considered a HDD solution to bring the cables ashore at Sunnyside Bay	Moray West has explored options for using HDD techniques at Sunnyside Bay. However, due to the height of the cliffs in this location, this option has been assessed by cable engineers are being technically very challenging.	and in conjunction with responses received during the marine licensing process. Selection of the final landfall location will take into account the responses received and concerns raised during both the OfTI PAC event and the subsequent onshore PAC events.
If Sunnyside Bay is not suitable, other than Sandend, what other alternative landfall locations have been considered?	Moray West acknowledges that the information provided during the PAC event on alternative locations considered as a potential landfall (other than Sunnyside Bay and Sandend) was limited. However, other locations had been considered as part of the work carried out to refine the Area of Search. This included consideration of alternative landfall locations to the east of Sandend Beach (in the vicinity of Redhythe Point). This stretch of coast was included in the Area of Search, upon which the pre-application consultation was carried out.	Based on feedback received during the PAC event, Moray West revisited the alternative landfall locations in the vicinity of the Redhythe Point (east of Sandend Bay). These alternative locations have been taken forward for inclusion in an expanded Landfall Area. This section of the coast (as well as all part of the Landfall Area) will be subject to more detailed engineering investigations (studies and surveys) as part of the identification of a final landfall location.

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West
If the cables are brought ashore at Sandend, local residents will no longer be able to access the beach.	Moray West explained that all construction activities at the landfall would be temporary in nature lasting anywhere between a few weeks (for open cut trenching installation methods) or a few months (for HDD methods). In the event that a HDD solution is used, potential effects on the beach (in terms of restricted access) would be limited as the cables would be routed beneath the beach in pre-drilled ducts which would extend from a point landward of the MHWS offshore to a suitable location (where there is sufficient water depth) offshore. However, there may still be a need to implement some access restrictions during HDD operations for health and safety reasons.	As part of on-going engineering investigations to identify a preferred landfall location, Moray West plans to carry out a geophysical and geotechnical survey of the entire stretch of coastline included within the Landfall Area in order to confirm what type of sediment and rock is present along the coast and in the nearshore water. These surveys are necessary as they will help to inform the selection of the final landfall location and the best method to be used to install the cable (e.g. open cut trench or HDD).
Sandend Beach is a very popular surfing location. Presence of the landfall will restrict surfing activities in this location. This will affect surfers directly who use the beach all year round and the local surf school as they will no longer be able run lessons etc.	As noted above, any beach access restrictions will be short term and temporary, limited to a few weeks (if using open cut trenching techniques) or a few months (for HDD activities). However, there should be no direct effects on the beach associated with HDD methods, although there could still be reduced access for health and safety reasons. It is also likely that there will be some access restrictions to surfing in the bay due to the presence of construction / cable lay vessels and other support vessels involved in the cable laying activities. However, these access restrictions will only be short term and temporary.	Potential effects on surfers have been assessed in the Moray West Offshore EIA Report – Volume 2 Chapter 6: Physical Processes and Water Quality and Chapter 15: Socio-economics, Recreation and Tourism and will be taken into consideration in the selection of the final landfall location.

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West
Local residents are concerned that although Moray West states the construction activities will be temporary and any restricted access to the beach will only be short term, there is concern based on evidence from along the coast (Portgordon) of the potential for cable installation activities at the landfall to last much longer than a few weeks / months.	Moray West is not in a position to comment of cable installation activities occurring elsewhere along the Moray Coast.  The timescales predicted for cable installation at the Moray West landfall using open cut trench techniques and HDD operations are based on experience and current construction best practice and refer to the timescales over which the physical operations will occur. For both techniques there is likely to be a requirement to construct a temporary construction compound, which may include a HDD drill rig. The construction compound / drill rigs will be positioned above the MHWS and will also be required to support other activities such as construction of the underground Transition Joint Bays (JTBs) and some sections of the onshore cables. There may also be a delay between installation of the HDD duct and delivery of the offshore export cables.  Consequently, there is potential for the construction compounds to be present for a longer duration than a few months. However, the activities that would potentially affect the beach and access to the beach would still be limited to a period of a few weeks / months.	Concerns raised by Sandend residents during the PAC event in terms of the duration of cable installation activities at the landfall and duration of any beach access restrictions will be taken into account as part of the detailed investigations to identify a final landfall location within the Landfall Area.  In the event that Sandend is selected as the preferred location for the landfall, Moray West will seek to minimise the potential for any localised disruption due to the presence of a construction compound and the duration of any beach access restrictions during the construction period.

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West
There is concern that the presence of the cables in the bay long term will affect the quality of the surf (height and frequency of the waves).	Where Moray West uses the open cut trench technique to bring the cables ashore there will be a requirement (as set out in the Design Envelope for the Offshore Wind Farm and OfTI (EIA Report - Volume 2: Chapter 4 Development Description) for the cables to be buried to minimum depth of 1 m (up to 3 m depending on seabed conditions). Only where burial is not possible due to hardness of the seabed will cable protection measures be used.  The potential effects of the cable within Sandend Bay on the quality of the surf have been assessed in the EIA Report - Volume 2: Chapter 6: Physical Processes and Water Quality. This assessment concludes that there will be no long-term effects on the quality of surf due to the presence of the cables.	Concerns over the presence of the cable in the bay and potential effects on the quality of the surf will be taken into account as part of the engineering investigations to identify a final landfall location and associated cable routing studies looking at the offshore approach to the final landfall. Where possible Moray West will seek to ensure that any cables installed within Sandend Bay are buried (either using through trenching or an HDD solution). There are no plans to use additional cable protection measures within Sandend Bay.

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West	
Sand in the bay is highly mobile. Is there a risk that the cables will become exposed overtime?	The potential for coastal erosion causing cable exposure at a Sandend Bay landfall has been assessed as part of the EIA. Conclusions from this assessment are presented in the Offshore EIA Report Volume 2 - Chapter 6: Physical Processes and Water Quality. The assessment concludes that although there have been historically low levels of morphological change at the coast, this could change in the future as a result of climate change and corresponding changes in sea level. Although unlikely to occur, potential effects of cable exposure have been assessed with respect to impacts on the Cullen to Stake Ness SSSI and requirements for future re-burial in the event that the cables do become exposed. This risk does not apply to a HDD solution as the cables will be buried several meters beneath the beach within ducts that are drilled through solid rock.	Engineering studies will consider the potential for exposure of the cable during operation of the project. As identified in the Offshore EIA Report (Volume 2 – Chapter 6: Physical Processes and Water Quality) the potential risk of exposure is limited based on the historically low levels of morphological change within the Sandend Bay area of the coast. However, the risk of exposure of the cables in the future is a major consideration for operation of the development. A key requirement of the detailed engineering studies will be to identify the most suitable landfall technique to be used (open cut trench or HDD) to achieve maximum burial depths in order to minimise the risk of cable exposure in the future.	

Questions/Comments Raised by PAC Event Attendees	Moray West Response	Further Action Taken by Moray West
Local residents are concerned that any activities involving installation of the cables using open cut trenching techniques will permanently affect the appearance of the beach.	All infrastructure and cables at the landfall will be buried beneath the ground and therefore will not be visible during operation of the Moray West Offshore Wind Farm. Where an open cut trench technique is used to install the cables, there will be full reinstatement of the affected area (e.g. beach) following installation of the cable and closure of the trench. Where a HDD solution is used, all ducts and cables will be drilled several meters beneath the ground. Connections to the onshore cables will be within the TJBs which will also be buried and disturbed ground above the TJBs (located landward of MHWS) fully reinstated. As noted above, the risk of cable exposure during operation of the wind farm has been assessed in the Offshore EIA Report (Volume 2 – Chapter 6: Physical Process and Water Quality).	As noted previously, Moray West will seek to ensure through detailed engineering studies that the cables remain buried for the duration of the Development. Potential long-term effects on the visual amenity value of the beach and bay therefore will be negligible.  These responses are provided in direct response to questions about Sandend Beach and Bay. As noted above, Moray West is still to determine the final landfall location which will be located somewhere along the coast between Findlater Castle and Redhythe Point.

# Appendix F – Additional Consultation Events

# Sandend Community Council Public Meeting

In response to concerns raised at the Portsoy PAC event on 15<sup>th</sup> January 2018, Moray West was invited to attended a Fordyce, Sandend and District Community Council Public Meeting at Sandend Community Hall on 8<sup>th</sup> February 2018. In attendance at the Public Meeting last were senior representatives from EDPR UK/Moray West and approximately 100 members of the general public.

An introduction to the company, designation of offshore wind farm zones and development process was provided by Moray West. After this the floor was open to the public and Moray West answered a variety of questions. This included specific questions regarding the proposed location of the landfall for the offshore export cables and potential effects of a landfall at Sandend Beach on local residents, the surfing community and overall amenity values of Sandend Beach and village.

Responding to questions Moray West committed to hold an additional onshore PAC consultation event in Sandend Village Hall, in addition to three events already planned at different locations (Buckie, Keith and Portsoy) to ensure maximum attendance from local residents and to engage with the community on an ongoing basis.

After the meeting, members of the Community Council and local residents from Sandend were given an opportunity to meet members of the Moray West Offshore Wind Farm Development Team and to ask further questions about the proposed development.

# Onshore Pre-Application Consultation Activities

In addition to the PAC event for the Moray West OfTI (including the Offshore Export Cable Corridor and Landfall Area), Moray West has carried out a series of PAC events in support of the Onshore Transmission Infrastructure application (i.e. the Planning Permission in Principle [PPiP] application). The location and date of these OnTI PAC events are provided below:

- Old Coach House Hotel, High Street, Buckie, AB56 1AR Tuesday 27th February 2018
- Royal Hotel, Church St, Keith, AB55 5BR Wednesday 28th February 2018
- Sandend Village Hall, The Bents, Sandend, Banff Wed 7th March 2018
- Station Hotel, 22 Seafield St, Portsoy, Banff, AB45 2QT Thursday 29th March 2018

Further information on the feedback received during these PAC events and Moray West's consideration of this feedback in the Onshore EIA Report and PPiP applications is provided in the Onshore PAC Report.