

Redacted

From: Redacted
Sent: 30 January 2019 11:55
To: Redacted
Subject: RE: Moray East - Cable Plan (CaP) Consultation - by 11/01/2019

Follow Up Flag: Follow up
Flag Status: Completed

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My apologies for the delay in responding to this consultation.

We have no significant concerns to raise with regards to the cable plan. We would however like to highlight that any consented cable protection works must ensure existing and future safe navigation is not compromised, accepting a maximum of 5% reduction in surrounding depth referenced to Chart Datum. This will be of particular concern where the cable comes into more shallow waters.

We would also expect all maritime safety legislation to be adhered to during the operation.

Kind regards

Redacted
Redacted

Please note I currently work Tuesdays, Wednesdays and Thursdays.

From: Redacted
Sent: 07 December 2018 13:31
To: Redacted

Subject: Moray East - Cable Plan (CaP) Consultation - by 11/01/2019

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)

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

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

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

Dear Sir/Madam,

Moray Offshore Windfarm (East) Limited (“Moray East”), on behalf of Telford Windfarm Limited, Stevenson Windfarm Limited and MacColl Windfarm Limited, having received consent under the above legislation have submitted to the Licensing Authority the documents attached.

Please find attached the proposed post-consent Cable Plan (“CaP”) and covering letter addressed to Marine Scotland Licensing Operations Team (“MS-LOT”) from Moray East. The purpose of the CaP is to satisfy the requirements of the following consent conditions:

- Condition 18 of the Telford Offshore Wind Farm, Stevenson Offshore Wind Farm and MacColl Offshore Wind Farm Section 36 Consents (as varied)
- Condition 3.2.2.10 of the Offshore Transmission Infrastructure (“OfTI”) Marine Licence (licence number: 05340/14/0)

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

<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Moray3>

The conditions state that the plan is to be submitted to the Scottish Ministers for their written approval, following consultation with Scottish Natural Heritage (“SNH”), the Maritime and Coastguard Agency (“MCA”) and the Scottish Fisherman’s Federation (“SFF”) and any such other advisors or organisations as may be required at the discretion of the Scottish Ministers.

We would appreciate any comments you may have on the attached documents, in order to determine whether it is fit for purpose for the Scottish Ministers to give it their written approval. Please note that we do not seek comments on the section 36 Consents nor the Marine Licences, which will not be amended.

If you wish to submit any comments, please do so to MS.MarineRenewables@gov.scot before the **11th January 2019**.

I would appreciate if you could acknowledge receipt of this email.

Yours faithfully,

Redacted

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Dh’fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh’fhaodadh nach eil beachdan anns a’ phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Our Ref: MM/dr -19-02

Your Ref:

11 January 2019

E-mail: **Redacted**

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

T: +44 (0) 1224 646944
F: +44 (0) 1224 647058
E: sff@sff.co.uk

www.sff.co.uk

Dear Sirs

Moray East Development Cable Plan

The Scottish Fishermen's Federation, on behalf of the 400 plus vessels in membership of its 8 constituent associations is pleased to comment on the proposed cable plan from the Moray East Development.

Referring to chapter 4 the SFF would express concern about the time where the cable may end unprotected on the seabed over the summer of 2021 and would expect at the very least, local fishing vessels are employed as guard vessels in mitigation for the temporary loss of access, which is not mentioned in the plan and contradicts GP2, 3, 4, 18 and F1 and 2.

Moving to chapter 5 the plan needs to elaborate and clarify how the MEMC and contractors will interact to avoid conflict with fishing to comply with GP4, 17, 18 and F1 and 2.

In chapter 7.3 discussing EMF, the only data is from a desktop study, which is not sufficient proof, the real effect needs to be measured and monitored.

The SFF are perplexed that chapter 9 does not appear to consider fishing activity as a constraint, this is in contradiction of GP1, 4, 17, 18, 19 and F1, F2 and 3. Proper communication with local fishers is the best way to access knowledge of the seabed and work towards co-existence.

The cable plan chapter 10 is lacking in an assessment of the risk to fishing of the cable, which is in contradiction of GP4, 17, 18 and F1, 2 and 3.

The SFF would expect chapter 11 to be more specific of the impacts of all forms of route clearance to provide more clarity on the safety aspects for the fishing industry, as per GP4, 18 and 18, F1, 2 and 3.

Members:

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

VAT Reg No: 605 096 748

The section on mechanical protection needs clarity on methods appropriate to each area according to the prevailing fishing activity. Full burial is the gold standard and advice has been given to the developers on mattresses, rock dumping, rock bags etc. SFF would further expect the plan to assess the use of GRP constructions which are becoming common in the Oil and Gas industry. This is all needed in order to comply with GP1, 4, 17 and 18, F1, 2 and 3.

Finally referring to the consent condition as quoted in chapters 12 and 13 which included “methodologies for our trawl surveys of the inter-array cable throughout the operational life of the windfarm where mechanical protection of cable land on the seabed is deployed”, is not addressed adequately. The use of the phrase “over trawl surveys COULD be employed”, is a clear attempt to downgrade the condition from mandatory to optional.

Yours faithfully

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From: Redacted
Sent: 11 January 2019 13:38
To: Redacted
Cc: Redacted
Subject: RE: Moray East - Cable Plan (CaP) Consultation - by 11/01/2019

Dear Redacted,

Thank you for the consultation below requesting comments on the Moray East Offshore Wind Farm Cable Plan (CaP). We note that the wind farm CaP covers the intra-array cables together with, to a more limited extent, the Offshore Substation Platform (OSP) interconnector cables. Both the intra-array cables and the OSP interconnector cables will be engineered and installed by a single contractor. The export cables are covered in the Offshore Transmission Infrastructure (OfTI) CaP, which we have not yet commented on.

Please find below our comments on the wind farm CaP:

1. In section 8.5 – UXO survey and clearance – it mentions that a UXO survey has been conducted but does not present the survey results. We are currently being consulted on a Marine Licence and European Protected Species licence application for UXO clearance.
2. A cable burial risk assessment has been undertaken and is presented in section 10. The minimum cable burial depth is between 0.6 – 0.7m depending on seabed substrate. The installation contractor has a target depth of 1m for all intra-array and OSP interconnector cables across the Moray East site. This is consistent with the Moray East ES 2012. A target depth of 1m should be sufficient to mitigate any electromagnetic fields (EMF). EMF from the cabling will not be greater than baseline (i.e. the earth’s magnetic field) and will not give rise to any significant impacts on fish or benthic interests.
3. We agree that there will be no changes to the predicted impacts (assessed as minor) from the proposed trencher.
4. The total intra-array cable length has decreased from 572km (assessed in the Moray East ES 2012) to approximately 173km. This means that any potential impacts caused by trenching, such as seabed disturbance and suspended sediment, will be reduced.
5. We may have further comments to make on the OfTI CaP when submitted.

We hope these comments are useful.

Kind regards

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Please note my email has now changed to Redacted

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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.
