

Inch Cape Offshore Wind Farm

New Energy for Scotland

Offshore Environmental Statement:
VOLUME 2A
**Appendix 5A: Summary of Scoping
Responses**



Appendix 5A: Summary of Scoping Responses

Organisation	Summary of Response / Comments	ES Reference / Response
Marine Scotland (The Scottish Government)	<p>Introduction Acknowledgement of the purpose of scoping opinions under the Electricity Works (Environmental Impact Assessment) (Scotland) EIA Regulations 2000. * Scottish Ministers welcome the commitment given in the report that the EIA process will identify mitigation measures in order to avoid, minimise or reduce any adverse impacts. Marine Scotland would suggest that the range of options considered should be informed by the EIA process in order that these objectives can be achieved.</p> <p>Land Use Planning * [The legislation to be considered has been provided in the consultation response document]</p> <p>Natural Heritage * SNH has produced a service level statement (SLS) for renewable energy consultation. Annex A details a list of references which should be fully considered as part of the EIA process.</p> <p>General Issues <i>Economic Benefit</i> * The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction operation and decommissioning of the development.</p> <p>Contents of the ES <i>Format</i> * The ES should be submitted in a user-friendly PDF format. * It is considered good practice to set out within the ES the qualifications and experience of all those involved in collating, assessing or presenting technical information. <i>Non Technical Summary</i> * Should be written in simple non-technical terms to described the various options for the development and mitigation measures. * Within the ES it is important that all mitigation measures are: clearly stated, fully described with accuracy, assessed for their environmental effects, assessed for their effectiveness, their implementation should be fully</p>	<p>Refer to Chapter 22: Socioeconomics, Tourism and Recreation.</p> <p>Information noted.</p> <p>See Appendix 7A: Environmental</p>

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	<p>described, how commitments will be monitored, and, if necessary, how they relate to any consents or conditions.</p> <p>* The EIA must address the uncertainty resulting from a developing and evolving layout, so that there is a clear explanation of the potential impact of each of the different scenarios.</p> <p>Archaeology <i>General Principles</i></p> <p>* The ES should address the predicted impacts on the historic environment and describe the mitigation proposed to avoid or reduce impacts to a level where they are not significant.</p> <p>* Direct impacts on the resource itself and indirect impact on its setting must be addressed in the EIA.</p> <p><i>Baseline Information</i></p> <p>* Information on the location of all archaeological/historical sites held in the National Monuments Record of Scotland can be obtained from www.PASTMAP.org.uk</p> <p>* Data on scheduled monuments, listed buildings and properties in care can also be downloaded from Historic Scotland's Spatial Data Warehouse. For further information contact hsgimanager@scotland.gsi.gov.uk</p> <p>Navigation</p> <p>* The ES should supply detail on the possible impact on navigational issues for both commercial and recreational craft, through: collision risk, navigational safety, risk management and emergency response, marking and lighting of tidal site and information to mariners, effect on small craft navigational and communication equipment, weather and risk to recreational craft which loose power and are drifting, in adverse weather conditions, evaluation of likely squeeze of small craft into routes of larger commercial vessels, and visual intrusion and noise.</p> <p>Ecology, Biodiversity and Nature Conservation <i>Species</i></p> <p>* The ES needs to show that the relevant wildlife legislation and guidance were taken into account. List provided. In terms of Scottish Government interim guidance, applicants must give serious consideration to meeting three fundamental tests (after scoping):</p> <ol style="list-style-type: none"> 1. Is the proposal directly connected with or necessary for the conservation management of the SPAs? 2. Is the proposal likely to have a significant effect on the qualifying interests of the SPAs either alone or in combination with other plans or projects? 3. Can it be ascertain that the proposal will not adversely affect the integrity of the SPA, either alone or in combination with other plans or projects? 	<p>Management Plan, for all Mitigation Measures.</p> <p>Noted, each Chapter of this ES explains the parametres assessed against the Design Envelope.</p> <p>See ES Chapter 17: Cultural Heritage and Marine Archaeology.</p> <p>See ES Chapter 19: Shipping and Navigation.</p>

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	<p>Water Environment</p> <ul style="list-style-type: none"> * Developers are strongly advised at an early stage to consult with SEPA as the regulatory body responsible for the implementation of the Controlled Activities Regulations (CAR). * SEPA's Pollution Prevention Guidelines should be taking into account in the preparation of the ES and during development. * Prevention and clean-up measures should be considered for each of the stages of the development. * Consultation with the local fishery board is encouraged at an early stage. * The ES should identify location and protective/mitigation measures in relation to all private water supplies within the catchments impacted by the scheme, including modifications to the site design and layout. <p>Other material Issues</p> <p><i>Traffic Management</i></p> <ul style="list-style-type: none"> * The ES should provide information relating to the preferred route options for delivering equipment, etc via the trunk road network. The ES should also address access issues, particularly those impacting upon the trunk network. * Where potential environmental impacts have been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by stating in the report: the work has been undertaken, what this has shown and why it is not significant. <p>General ES Issues</p> <p><i>Consultation</i></p> <ul style="list-style-type: none"> * The ES should also be submitted in a user-friendly PDF format. * Developers are asked to issue ESs directly to consultees. * The Energy Consents Unit also requires 8 hard copies to be issued internally to Scottish Government consultees. <p><i>Gaelic Language</i></p> <ul style="list-style-type: none"> * Where s36 applications are located in areas where Gaelic is spoken, developers are encouraged to publicising the project details in both English and Gaelic. <p><i>OS Mapping Records</i></p> <ul style="list-style-type: none"> * A detailed Ordinance Survey plan showing the site boundary and all turbines, access tracks and onshore supporting infrastructure should be submitted in a format compatible with the Scottish Government's Spatial Data Management Environment (SDME), along with appropriate metadata, at the application stage. <p><i>Difficulties in Compiling Additional Information</i></p>	<p>Information noted and ES prepared to support this approach.</p> <p>Information noted.</p>

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	<p>* An explanation of any necessary information not included in the ES should be provided, complete with an indication of when an addendum will be submitted. <i>Application and ES</i></p> <p>* A developer checklist is enclosed with the consultation response document to help developers fully consider and collate the relevant ES information to support applications. <i>Consent Timescale and Application Quality</i></p> <p>* Developers are advised to consider all aspects of this scoping opinion when preparing a formal application, to reduce the need to submit information in support of applications.</p>	
Scottish Natural Heritage (SNH)	<p>* SNH recommends that SERL(now ICOL) discusses their approach with Marine Scotland (consenting authority for Section 36 applications and HRA).</p> <p>* A single report should be submitted for the offshore and onshore activities (single ES and HRA report) in support of the Section 36 application.</p> <p>*SNH assumes further information will be released with regards the onshore works and that Angus and other relevant LPA will be consulted.</p> <p>APPENDIX A – Advice on Natural Heritage Interests to be coped into the EIA</p> <p>Project planning Alternatives studied and the final justification for the site should be presented in the ES. ES should address impacts from the following phases of development: Construction, O&M, Repowering, Decommissioning</p> <p>Landscape and Visual <i>Seascape, Landscape and Visual Impact Assessment</i></p> <p>* SNH are reviewing existing guidance in order to draw up a list of recommendations for carrying out seascape, landscape and visual assessment in Scotland. Extend of landscape study area SNH recommend an initial ZTV of 45km to define the study area for the following reasons: - local landscape designations AGLV in Aberdeenshire and in Fife at 30km and 27km respectively. - SNH good practice guidance recommends 35km as a minimum ZTV for 130m high turbines – the proposed Inch Cape turbines are up to 182m.</p>	<p>Information and comment noted.</p> <p>See Chapter 6: Site Selection and Alternatives. Information noted; each technical chapter of this ES addresses the impacts for the listed phases of development.</p> <p>Information noted. See Chapter 16: Seascape Landscape and Visual. A 50 km SLVIA Study Area was used for the SLVIA.</p>

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	<p>1. Method of assessment</p> <ul style="list-style-type: none"> * The approach described in the 'Guidelines for Landscape and Visual Impact Assessment' should be used. It is important to consider the key elements that are specific to each environment, whether land-based or marine. * The techniques and methods developed to evaluate seascapes should be critically assessed before they are generally applied in Scotland. * What it is required is a coastal landscape assessment, clearly related with both 'seawards' and 'landwards'. Important elements to consider include the contrast of form, pattern, texture and colours between the landscape and the sea. In particular, the horizontal extent of the sea is a strong compositional attribute. <p>2. Baseline – Character Assessment</p> <ul style="list-style-type: none"> * Within the study area, the seascape character types applied are as identified in the SNH 'Seascapes' report. Given that this study was limited to a strategic desk-based approach, they can only be applied to proposals at the strategic level. * SNH is currently reviewing all available guidance on this and hopes to draw a list of recommendations for SLVIA in Scotland. <p>Relative sensitivities should be established prior to determining the significance – should follow approach set out in the GLVIA, Landscape, Institute of Environmental Management and Assessment Guidelines (2002).</p> <p>3. Designated landscapes</p> <p>Historic Scotland’s Inventory of Gardens and Designed Landscapes across Scotland should be taken into consideration.</p> <p>4. Viewpoint selection</p> <p>Angus coastline varies dramatically. Many views experience from east coast railway line. Important number of settlements. Attracts many visitors.</p> <p>Viewpoints should be selected with SNH, Dundee, Fife and Angus council.</p> <p>Cumulative impacts – welcome FTOWDG approach – SNH initial comments provided 27 May 2010.</p> <p>5. Potential Mitigation</p> <p>Guidance of Siting and Designing Wind farms in the Landscape – recently published- design process should be clearly articulated.</p> <p>Paramount importance that the applicant considers their wind farm design in the context of other FTOWDG proposals. A very important aspect of cumulative SLVIA – developers need to share good practice.</p>	

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	<p>Designated Sites and Species Protection Marine Protection Areas (MPA)– The Marine (Scotland) Action 2010 and the UK Marine and Coastal Access Act 2009 include new powers and duties to designate MPA to sustain and manage our seas to the benefit of future generations. The applicant should liaise with Marine Scotland over this aspect and SNH will seek to keep the applicant informed as to their input to the progress of MPAs, where this is relevant.</p> <p>Benthic Ecology BAP habitats and species and Marine Priority Features should be identified. SNH would welcome a summary report outlining the geophysical survey results.</p> <p>Biotopy/habitat maps should be used to inform final wind farm layout.</p> <p>Marine Mammals & Noise Species to consider – more detail should be provided. Sharp declines in harbour seal populations over recent years should be included in the assessment.</p> <p>A review of survey data should be conducted to assess methodologies for marine mammal data collection. SNH would also recommend further dialogue.</p> <p>SNH/JNCC – would welcome cumulative approach to noise study in particular.</p> <p>Ornithology (bii, p10). The Firth of Forth supports nationally and internationally important bird species and is included as an area of search for marine SPAs. Extensions for seabirds have recently been announced for the Forth Islands SPA. There is on-going work in respect of breeding terns.</p> <p>Marine SPAs will also be designated for inshore aggregations of non-breeding water birds and offshore aggregations of seabirds, with references to JNCC reports 402 and 431.</p> <p>(bii, p10). With reference to the introduction to the ornithology section (5.2.4) of the scoping report, the region to consider should be the known foraging range of bird species likely to occur around the proposed development site.</p>	<p>Refer to Chapter 12: Benthic Ecology.</p> <p>Information and comment noted.</p> <p>Refer to Chapter 14: Marine Mammals.</p> <p>Refer to Chapter 15: Ornithology.</p>

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	<p>(bii, p10) SNH urges caution in applying bird species sensitivity ratings in Garthe & Huppopp (2004) and COWRIE guidance (King et al. 2009).</p> <p>Reviewing and updating available information on seabird sensitivity in UK waters will require collaboration between JNCC, SNH and other conservation agencies and seabird experts.</p> <p>(bii, p13). Recommend that the applicant makes a desk-based assessment of the impacts of construction and operational noise on the prey species of seabirds. The assessment, and any mitigation, should address breeding, moult and wintering periods.</p> <p>(bii, p13). Recommend an assessment of the potential for O&M activities (boat or helicopter) to cause disturbance and displacement to birds using the site. Suggest remote condition monitoring systems to reduce the number of turbine visits as potential mitigation.</p> <p>(bii, p13). Crown Estate Strategic Ornithological Support Services (SOSS) will be reviewing existing knowledge on collision risk and avoidance rates for offshore wind farms and will also consider displacement impacts (100% avoidance) SNH recommend that this work is referred to once published.</p> <p>(bii, p13). Recommend an assessment of the potential impacts of turbine lighting on birds.</p> <p>(bii, p13). Consider potential impacts of foundation designs on birds and possible mitigation (e.g. lattice type construction above the water may attract birds by providing a perch area).</p> <p>(bii, p13). Recommend a preliminary analysis of potential collision risk to passerines using data from the North Sea Bird Club, East Coast Bird Observatories and locally available data. Suggest considering this via FTOWDG.</p> <p>(bii, p13). Barrier effects. A number of publications are identified for reference.</p> <p>(bii, p14). Recommend that consideration is given to the potential impact of scour protection on sandeels, a primary prey species of seabirds.</p>	<p>Refer to Chapter 14: Marine Mammals.</p>

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	<p>(bii, p14). Recommend that the applicant, and FTOWDG, consider potential collision risk to bean geese at the Slammanan Plateau SPA and the Svalbard population of barnacle geese overwintering at the Upper Solway Flats and Marshes SPA is included in any impact assessment and HRA. The migratory route of bean geese population is unknown but there have been anecdotal accounts of bean geese migrating along the Forth estuary; WWT are undertaking tracking of barnacle geese.</p> <p>Potential impacts of the proposal will need to be considered alone and in combination with other plans and projects – other offshore wind farm proposal in the Outer Forth and Tay and the Round 3 zone; also other types of industry and activity that may potentially be relevant.</p> <p>SNH recommend 20 SPAs for HRA in respect of cumulative impacts; it is also noted that HRA will be required for any new marine SPAs which may be classified for inshore or offshore aggregations of seabirds.</p> <p>SPA bird interests are wide-ranging, seabirds may make long foraging trips and there are migratory species to consider. Offshore wind farms may be ‘connected to’ SPAs at much greater distances than those experienced for onshore development. As proposals are located further away from the site direct impacts are less likely on qualifying species while they are within the SPA.</p> <p>(Appendix E). SNH provide a list of seven SACs for HRA and summary of their advice with respect to likely significant effect for the qualifying interests of each SAC. Likely significant effect is provisionally identified for:</p> <ul style="list-style-type: none"> • Firth of Tay and Eden Estuary SAC – harbour (common) seal; • Isle of May SAC – grey seal; • Berwickshire and North Northumberland Coast SAC – grey seal; • Moray Firth SAC – bottlenose dolphin; • River Tay – Atlantic salmon and lamprey species; • River Teith - Atlantic salmon and lamprey species; and • South Esk - Atlantic salmon, lamprey species, freshwater pearl mussel. 	<p>Refer to Chapter 13: Natural Fish and Shellfish</p> <p>Noted: FTOWDG have worked together on Marine Mammals, Ornithology; Commercial Fish; SLVIA;</p>

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	<p>Cumulative Impacts (av, p8). SNH welcomes collaborative work on cumulative impacts through the Forth and Tay Offshore Windfarm Developers Group (FTOWDG) and is keen to maintain dialogue. Referred to SNH response letters of 26/10/09 and 11/12/09 with respect to the east Coast Discussion Document – Cumulative Impacts (Royal Haskoning).</p> <p>SNH/JNCC welcome FTOWDG work and further discussion, in particular on the following interests:</p> <p>SLVIA – Natural and Commercial Fish Benthic Ecology – not impacts from IC proposal alone unlikely to be significant – but cumulative context could be a concern. Ornithology – cumulative impacts to SPA bird species will need to be considered Mammals – high value in coordinating various survey work, as well as necessary licence applications, to more effectively address the marine mammal impact assessment.</p> <p>Hydrodynamics and coastal geomorphology</p> <p>The proposed approach outlined in the scoping report should provide adequate understanding of the potential impacts of the wind farm on the baseline environmental conditions</p> <p>ONSHORE (iv, p7). SNH note that the location and extent of onshore infrastructure not yet confirmed. There may be SSSIs that require consideration in this regard but SNH cannot yet be definitive.</p> <p>Cable landfall SNH would welcome collaborative approach between developers.</p> <p>Further information on the onshore elements of the Inch Cape project is anticipated. SNH will then expect to comment in more detail on the following key work elements:</p> <ol style="list-style-type: none"> 1. Habitats – SPAs, SACs, SSSI 2. Ornithology 	

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	<p>3. Mammals 4. Reptiles and Amphibians 5. Hydrology and hydrogeology</p> <p>APPENDIX B – Habitats and Birds Directives, Habitats Regulations Outlines HRA process Further advice on HRA – Appendix D: SNH advice of HRA for SPAs and Appendix E: SNH advice of HRA for SACs</p> <p>APPENDIX C – EUROPEAN PROTECTED SPECIES Certain species in IV of Habitats Directive are EPS species requiring strict protection SNH outline the Habitats Regulations conservation objectives. Test 1,2,3 are outlined</p> <p>APPENDIX D – Inch Cape: HRA – SPAs A list of SPAs is provided – same as Table E2 in FTOWDG bird report (also presented in CDD#2)</p> <ol style="list-style-type: none"> 1. Is the proposal directly connected with or necessary for the conservation management of the SPAs? 2. Is the proposal likely to have a significant effect on the qualifying interests of the SPAs either alone or in combination with other plans or projects? 3. Can it be ascertain that the proposal will not adversely affect the integrity of the SPA, either alone or in combination with other plans or projects? <p>APPENDIX E – Inch Cape: HRA – SAC A list of SACs are provided:</p> <ul style="list-style-type: none"> • Firth of Tay and Eden Estuary SAC – harbour (common) seal • Isle of May SAC – grey seal • Berwickshire and North Northumberland Coast SAC – grey seal • Moray Firth SAC – bottlenose dolphin 	

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	<ul style="list-style-type: none"> • River Tay – Atlantic salmon and lamprey species • River Teith - Atlantic salmon and lamprey species • South Esk - Atlantic salmon, lamprey species, freshwater pearl mussel <p>SNH advice:</p> <p>The EIA process will need to address the following questions:</p> <ol style="list-style-type: none"> 1. Is the proposal directly connected with or necessary for the conservation management of the SAC? 2. Is the proposal likely to have a significant effect on the qualifying interests of the SAC either alone or in combination with other plans or projects? 3. Can it be ascertain that the proposal will not adversely affect the integrity of the SAC, either alone or in combination with other plans or projects? <p>Importance of noise impact assessment highlighted. The HRA will address the impacts of noise in the context of the conservation objectives for each SAC qualifying interest.</p> <p>Advice is provided on each of the SACs listed above with respect to the questions posed.</p> <p>ONGOING LIAISON –</p> <p>SNH welcomes ongoing liaison with ICOWL and with FTOWDG in respect of the HRA processes. Agreeing the scope of, and information required for, HRA will be an iterative process.</p>	
SEPA	<p>Under the Water Environment and Water Services (Scotland) Act 2003, SEPA is responsible for producing and implementing River Basin Management Plans for Scotland and the Solway Tweed River Basin Districts. These basins extend to 3 nm seaward from the Scottish coastline. Considering the scoping report covers only the components of the OWF beyond 3 nm, SEPA does not have any comments to date.</p>	

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Marine Scotland Science	<p>Metocean ICOWL will have to provide the exact location and the state of some of the parameters associated with the Met Office wave hindcast model.</p> <p>Developer should include a reference in the Climate Change section on ‘a risk in the mean sea level and an increase in average storm intensity.</p> <p>Within the baseline suspended sediment section more detail and references are required to support the statement ‘due to the seasonal nature of the frequency and intensity of storm events.</p> <p>Benthic ecology Proposals satisfactory – minor amendments to reference papers provided.</p> <p>Marine Mammals MS advises that the developer should assume that the dolphins originate from the Moray Firth SAC as there is no evidence to suggest other populations are using the area.</p> <p>MS would like to understand why the data already collected on seals in the Forth and Tay can not address the impact that the development might have on seals.</p> <p>The potential for cumulative effects on species should be assumed to accumulate linearly, unless evidence to the contrary is found.</p> <p>Standard noise protocol should also be used to assess impacts.</p> <p>Barrier to movement should be viewed as both the result of the presence of vessels and foundations.</p> <p>Long term avoidance impacts should be considered in the context of post construction monitoring.</p> <p>Potential impacts associated with disturbance and collision should be primary/direct impacts. Impacts on prey species, which are difficult to quantify should be viewed as secondary impacts.</p>	<p>Refer to Chapter 10: Metocean and Coastal Processes</p> <p>See Chapter 14: Marine Mammals</p> <p>See Chapter 13: Natural Fish and Shellfish</p>

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	<p>Fish surveys Developers should undertake desk studies regarding fish densities and distribution rather than conducting surveys.</p> <p>Ornithology Disruption to habitat function has not been included in the list of possible impacts. Impacts should be listed in the order of priority. Fish surveys have been identified, fish distribution and abundance varies from year to year, benthic habitat mapping should be used to predict fish distributions/prey species.</p> <p><i>Will the boat survey transects and buffer zone design be adequate to use gradient based approaches to EIA?</i></p> <p>Design of survey was agreed between developers and TCE. Ultimately the regulator needs to sign off the design to ensure it is fit for purpose.</p> <p>Commercial fisheries Effects, either short term or long term could manifest in both the OWF site and export cable route corridor.</p> <p>Shellfish are currently most valuable catch in area and a large proportion of the landings are taken by smaller boats. These potential impacts should be assessed through FTOWDG.</p> <p>Displaced effort may also have direct economic impact, through increased steaming time, vessel costs and reduced catches, competition for limited space.</p> <p>MSS welcomes collaborative approach as outlined in the CDD#2.</p> <p>A cumulative and in-combination impact assessment is also a requirement of the HRA with respect to both SPAs and SAC.</p> <p>Noise Impacts on marine mammals and fish should be assessed. Background noise and vibration from ships engines, piling hammers and auguring operations during the construction of foundations should be considered. Review Moray firth studies.</p>	<p>See Chapter 15: Ornithology</p> <p>See Chapter 18: Commercial Fisheries</p>

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	<p>Migratory fish should be considered, including salmon, sea trout, sea lamprey, river lamprey – adults and juveniles should be included in the assessment. Avoidance of cable route corridors as a potential result of EMF should also be reviewed.</p> <p>Cable route must be considered in the overall footprint of the development works.</p> <p>Appendix A – Scoping comments in relation to information requirements on diadromous fish of freshwater fisheries interest.</p> <p>Salmon, sea trout, eel – these species use coastal areas. High economic/conservation value.</p> <p>The following questions need to be answered:</p> <ol style="list-style-type: none"> 1. Identify which species use the area – feeding/migration/time of year 2. Fish behaviour – swimming depth 3. Impacts related to deployed devices should be assessed including: strike, avoidance, disorientation, delayed migration 4. Cumulative impacts 5. 1-4 above should be assessed to determine likely risk. 6. If there is remaining doubt over potential impacts, developer should recommend a scientifically robust monitoring strategy to assess impacts on stocks as a whole or on particular rivers as necessary. <p>Developers should review recent report related to migratory salmon, sea trout and European eel.</p>	
<p>Marine Scotland Compliance</p>	<p>Compliance team has spoken to David Cumming, Master of Anstruther based creel vessel 'Boy Gary' CY37 – which has gear position in the area around Bell Rock. David was not aware of any other creel vessels work further east. He was also not aware of Nephrop Trawlers working the IC grounds.</p> <p>Potential issues are: Scallop dredgers; Squid fisheries; and Vessels using ports in the Aberdeen district may be the most significantly impacted.</p>	<p>See Chapter 18: Commercial Fisheries</p>

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Royal Society for the Protection of Birds (RSPB)	<p>Fish species Sandeels (lesser) – concerns that this principle prey species of many top predators, including seabird species, will be negatively affected. Assess recruitment, abundance and size of sandeel. These impacts could in turn impact breeding sea bird populations.</p> <p>RSPB and other seabird experts should be included as stakeholders in work to characterise the fish community and investigate possible impacts on sandeel within the Inch Cape area.</p> <p>Transboundary effects RSPB welcome the inclusion of transboundary effects in the EIA.</p> <p>Cumulative Onshore wind farms should be included in the assessment. Effects on the feeding grounds of migratory birds.</p> <p>Study area Montrose to st abbs a pragmatic starting point. Farne Islands should be included considering many species using nearby Wee Bankie and Marr Bank are from these colonies.</p> <p>Waders and geese boundaries will also have to be extended.</p> <p>Note: Arctic tern = Annex 1 and Herring gull is on the BoCC red list.</p> <p>Designated sites Should be considered in the assessment.</p> <p>Aerial surveys Further aerial work should be considered. Using only boat based data for a side of this size could be problematic.</p> <p>Radar Radar should also be considered for waders, ducks and geese for information in periods of darkness and extreme weather.</p>	<p>See Chapter 13: Natural Fish and Shellfish</p> <p>See Chapter 15: Ornithology</p>

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	<p>Climate Change RSPB would like to see a full carbon balance budget for the proposed development detailed in the ES.</p>	See Appendix 8A: Carbon Balance Review.
<p>Ministry of Defence (MOD)</p>	<p>* The MOD's main concern relates to the potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations.</p> <p>Air Traffic Control (ATC) radar</p> <p>*The turbines will be 37 km from, in line of sight to, and will cause and unacceptable interference to the ATC radar at RAF Leuchars.</p> <p>*false aircraft returns which ATC controls must treat as real is major issue.</p> <p>*If these issues can be overcome, the MOD will request that all turbines be fitted with 200 candela omni-directional red lighting.</p> <p>*Consultation between developers and the MOD is welcome.</p>	See Chapter 20: Military and Civil Aviation
<p>Civil Aviation Authority (CAA)</p>	<p>Pre-scoping response received – 14 April 2010.</p> <p>Upon review of the scoping report, CAA do not foresee any impacts upon operations associated with nearby aerodromes.</p> <p>Responses from NATS and MoD should be sought – ongoing liaison and outcomes to be document in scoping report.</p> <p>Aviation warning lighting – requirements of Air Navigation Order 2009 Article 220 should be addressed.</p> <p>Impact on aviation of power line routeing between landfall and onshore substation must be considered. May fall under OFTO.</p> <p>CAA advice on the colour of wind turbines – international criteria states upper 2/3 should be white. Further advice:</p> <ul style="list-style-type: none"> - Structure over 300 ft should be mapped on aviation charts – development details should be provided to the Defence Geographic Agency. - Met mast lighting and marking should be adequate, particularly during any survey phases. 	See Chapter 20: Military and Civil Aviation

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	<p>Cumulative CAA would like to see a cooperative 'regional solution' between developers considering the number of turbines proposed in the outer Firths of Forth and Tay.</p>	
<p>NERL Safeguarding</p>	<p>NERL has no safeguarding objection.</p>	<p>See Chapter 20: Military and Civil Aviation</p>
<p>Maritime & Coastguard Agency (MCA)</p>	<ul style="list-style-type: none"> * The ES should supply detail on the possible impact on navigational issues, both commercial and recreational, including: collision risk, navigational risk, visual intrusion and noise, risk management and emergency response, marking and lighting of site and information to mariners, effect on small craft navigational and communication equipment, the risk of drifting recreational craft in adverse weather and tidal conditions, the likely squeeze of small craft into the routes of larger commercial vessels. * A navigation risk assessment will need to be submitted in accordance with MGN 371 (and 372) and the DTI/DfT/MCA Methodology for Assessing Wind Farms. * Particular attention should be paid to cabling routes and burial depth, and an anchor penetration study or burial protection index may be necessary. * Reference should be made to Marine Environmental High Risk Areas (MEHRA). *Cumulative impacts should be considered through FTOWDG * Casualty information from the MAIB and RNLI would be good data sources in order to establish risk profile. *Given details of turbines and foundations largely unknown, developers should use principles of Rochdale envelope to assess navigational impacts. *reference to IALA recommendations on marking of OWF should refer to O-139 Edition 1 December 2008. *MCA Shipping Route template does not recommend the development of wind farms within a distance of 5nm from the entry/exit of a Traffic Separation Scheme (TSS). *MCA recommends a minimum separation of 3.5 nm between turbines on opposite sides of a route. *Shipping and navigation studies should include radar and manual observations in addition to AIS data. *full identification of all marine users should be made considering the potential displacement of traffic to the east. *implications of the site size and location on SAR resources and emergency response and cooperation plans and guard vessels provisions should be considered. *OWF impacts on ships radars requires further discussion within the radar subgroup of NOREL. *MCA reports available from the MCA website. 	<p>See Chapter 19: Shipping and Navigation</p>

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The Northern Lighthouse Board (NLB)	<ul style="list-style-type: none"> * The NLB agrees that Notice to Mariners, Radio Navigation Warning and publications in appropriate bulletins will be required stating the nature and timescales of works carried out in the marine environment. * All navigational marking and lighting of the site or its associated marine infrastructure will require the Statutory Sanction or the NLB prior to deployment. * The Navigational Risk Assessment is required to be in accordance with the information given at section 5.3.2 (scoping report), and in line with the requirement of MCA Marine Guidance Note 371. * The NLB encourages the Navigational Risk Assessment to include a workshop approach to hazard identification and mitigation. * The NLB also encourages engagement with the FTOWDG to work together to minimise the cumulative impact of site development. 	See Chapter 19: Shipping and Navigation
RYA and RYA Scotland (joint response)	<ul style="list-style-type: none"> * RYA has concerns regarding recreational boating and offshore energy devices – these should be material consideration in the planning of any marine development. * The RYA expect that data from the UK Coastal Atlas of Recreational Boating will be taken into account and represented in the ES. * The RYA would be happy to provide additional data to inform the ES. * The RYA recognises that increased navigational risk occurs during construction, major maintenance and decommissioning and therefore temporary safety zones are required. These activities should be supported by regular Notices to Mariners. * In summary, the RYA's concerns with offshore wind energy developments and recreational boating relate to: navigational safety (collision risk, risk management and emergency responses, marking and lighting, effect on small craft navigational and communication equipment, weather), location (loss of cruising routes, squeeze into commercial routes, effect on sailing and racing areas, cumulative effects, visual intrusion and noise), end of life (dereliction, decommissioning), and consultation. 	See Chapter 19: Shipping and Navigation
Ports & Harbours	<ul style="list-style-type: none"> * The application must include a full Navigation Risk Assessment in line with MGN 371. 	See Chapter 19: Shipping and Navigation
The Joint Radio Company Ltd (JRC)	<ul style="list-style-type: none"> * The JRC does not foresee any potential problems based on known interference scenarios and the data provided. 	

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Historic Scotland (HS)	<p>* Information on all scheduled monuments, listed buildings, gardens and designated landscapes and designated wreck is available from www.PASTMAP.org.uk</p> <p>Marine Assets</p> <p>* HS confirms that there are no designations within their statutory remit located within the proposed development area.</p> <p>* HS notes various undesignated wrecks within and outwith the site. These impacts should be assessed with the involvement of archaeologists and the relevant Council Archaeology Services.</p> <p>* HS notes an archaeological analysis of geophysical data will be completed – these results should be archived through the Royal Commission on the Ancient and Historical Monuments of Scotland.</p> <p>* HS notes onshore works will be considered separately – HS will then provide comments.</p> <p>* There are terrestrial assets with a seascape setting, which may be subject to an indirect impact as a result of the proposed offshore turbines. E.g. Bell Rock Lighthouse, HB no. 45197) – impacts on the setting need to be considered.</p> <p>Cumulative Impact</p> <p>* HS welcomes that potential cumulative impacts shall be assessed.</p> <p>Our Views on the Principle of this Proposal</p> <p>* HS are content with the principle of the proposal. HS considers unlikely that there shall be significant adverse impacts on marine assets and on the setting of terrestrial assets within HS statutory remit. We will need the full ES for us to give our final view on the proposed development.</p> <p>* In HS's view, the proposed methodology for baseline surveys, data sources and assessment of impacts and mitigation is considered acceptable.</p> <p>* The relevant Council archaeological and conservation service will be able to provide information and advice on unscheduled archaeology and category B and C (S) listed buildings.</p> <p>* Please refer to advise contained in HS's technical guidance note on setting.</p>	<p>See Chapter 16: Seascape, Landscape and Visual</p> <p>See Chapter 17: Cultural Heritage and Marine Archaeology</p>
Transport Scotland	<p>* The percentage increase in traffic on the trunk road is such that the proposed development is likely to cause minimal environmental impact on the trunk road. On this basis TRNMD have no comments to make.</p>	
Chamber of Shipping	<p>*CoS welcomes the opportunity to comment</p> <p>*Importance of commercial navigation, as outlined in section 5.3.2 of the scoping report is paramount.</p> <p>*The proposed location is in direct conflict with shipping traffic movement and poses serious threat to both safety and trade.</p>	<p>See Chapter 18: Commercial Fisheries</p>

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	<p>*Preliminary investigations (reference to Marico Marine studies) suggest maritime traffic is very high. Direct and indirect impacts on any routes identified would result in a strong objection from the CoS. Wind farms should only be developed if they can deliver the best interests of a nation and the regional economic prosperity.</p> <p>*Vessel and mariner need to be protected.</p> <p>*increased carbon emissions of key concern</p> <p>In depth assessment of the following is required:</p> <ol style="list-style-type: none"> 1. Navigation safety 2. Traffic survey 3. Effects on navigation or auxiliary OREI structures 4. Visual navigation and collision avoidance 5. Cumulative impacts 6. Mitigation 	<p>See Chapter 19: Shipping and Navigation</p> <p>See Chapter 22: Socio-economics and Tourism.</p>
Scottish Canoe Association (SCA)	<p>* The SCA do not have any concerns with this proposal.</p> <p>* Given the distance out to sea this is not an area where sea Kayakers would venture into and the development should not have any significant impact on tidal flows and sediment deposition close to shore where small recreational boats such as kayaks could be affected by any potential changes to tidal flows and sandbanks.</p>	
Health and Safety Executive (HSE)	<p>* HSE cannot usefully comment on what information should be included in the ES, however it should not include measures which could conflict with the requirements of the Health and Safety at Work etc Act 1974 and its relevant statutory provisions.</p>	
The Crown Estate	<p>Scoping report balanced and comprehensive. No formal response will be submitted. Commented that it was right that Aberdeen OWF was scoped into our proposals as a potential cumulative impact.</p>	
Scottish Council for Voluntary Organisations	<p>Thanks for the scoping documents related to the proposed Inch Cape Offshore Wind Farm. No comments. New contact details provided.</p>	

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Dundee Council	<p>The report indicated a comprehensive future review of the environmental impacts of the project. Two projects should be considered in the assessment of cumulative and in-combination impacts.</p> <ul style="list-style-type: none"> - Dundee biomass project - Dundee coastal study (led by council officer Gopal Narayanan) 	Chapter 4: Process and Methodology
Chris Harvey MSP The Scottish Parliament	Chris Harvey MSP would like to be kept up to date on any further developments.	
Fife Council	<p>*Fife Council would like to reserve the right for further opportunity to comment on the selection of views of the proposal site from points within East Fife. Obviously prominent views from points within St Andrews need to be considered as well as points in the Fife Ness Area as well as higher topography points within Fife where cumulative issues with onsite installations may be relevant. Visual and setting impacts need also to be considered as the development is close to the A-listed Bell Rock Lighthouse.</p> <p>*In terms of shipping routes impact on the Port of Rosyth in terms of possible future development of European routes and the transport of freight from proposed enhanced container facilities at the port should be fully considered as this is a strategic consideration for Scotland and Fife.</p> <p>*Full consideration should be made with regard to the potential impact on the operational fishing fleets from Fife's East Neuk ports and proper consultation with the relevant parties should be undertaken.</p> <p>*Ecological issues appear to be adequately dealt with in terms of species and locational issues. Continued dialogue with key agencies such as SNH and the RSPB will be essential to ensure full coverage of all strategic environmental issues.</p> <p>*Any chapter relating to construction and maintenance base site selection must refer to the Ports of Methil, Burntisland and Rosyth as options, in compliance with the emerging N-RIP requirements. Fife Council is seeking to ensure that employment opportunities can be generated for the development of renewable energy technologies in the local economy as a positive spin off from developments including the offshore wind farm proposals.</p>	<p>See Chapter 16: Seascape, Landscape and Visual</p> <p>See Chapter 17: Cultural Heritage and Marine Archaeology</p> <p>See Chapter 18: Commercial Fisheries</p> <p>See Chapter 19: Shipping and Navigation</p> <p>See Chapter 22: Socioeconomics and Tourism</p>

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	<p>Archaeological interests are not necessarily an obstacle to development but they will feature as an important environmental issue and need to be adequately considered as part of the EIA process using existing data, further investigation and appropriate management plans for any features found.</p>	