

Marine Scotland  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

██████████@ukchamberofshipping.com  
██████████

By email: [ms.marinelicensing@scotland.gsi.gov.uk](mailto:ms.marinelicensing@scotland.gsi.gov.uk)

3 September 2013

Dear Sir/Madam

**RE: 005/OW/SER - 10: Request For Comments Section 36 & Marine Licence  
Application Inch Cape Offshore Limited: 24 July 2013**

The UK Chamber of Shipping welcomes the opportunity to comment on the application to construct and operate the Inch Cape Offshore Wind Farm.

We have the following comments to make on Chapter 19 and Appendices 19A & 19B of the Environmental Statement (ES):

1. We have concerns over the potential cumulative impacts on navigation resulting from the simultaneous construction of Inch Cape and other offshore wind farm developments in the region. We consider that the increase in vessel traffic associated with simultaneous construction could result in further safety risk to some shipping routes identified in the Navigational Risk Assessment (NRA) traffic surveys and may lead to further route deviations. These deviations could lead to increased voyage times and have impacts on the commercial viability of affected routes. Therefore, we suggest additional assessment and mitigation measures are considered as project construction timetables are confirmed.

We recommend that the Forth and Tay projects' construction timetables are made available as soon as possible in order to enable proper assessment of any additional navigational safety risks or route deviations.


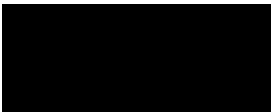
2. The Environmental Statement does not take into account the future increases in shipping density resulting from possible future non offshore wind developments in the Forth, such as the potential development of three to four biomass plants, which may increase numbers of large bulk carriers in the region.
3. We recommend that the export cables are buried using techniques approved by the MCA, particularly in the high risk areas for incidents indicated in the NRA, in order to mitigate safety risks to emergency anchorage areas. Burial should be at depths sufficient to reduce the risk of anchor interaction to acceptable levels. Where burial is

not possible and protection is required, navigable water depth should not be reduced by more than 5% of chart datum.

4. For vessels routing to the east of the Inch Cape site, we feel that mitigation measures should be applied to ensure that a safely navigable corridor is maintained between Inch Cape and the Firth of Forth Round 3 projects. The width of any proposed corridor should be in line with MCA and Northern Lighthouse Board (NLB) advice. The MGN 371 shipping template is currently undergoing review by the NOREL group but the indication is that corridor proposals will be reviewed on a case-by-case basis. As a starting point, the developers should refer to the current version of the template, which recommends a minimum distance of 3.5NM between offshore wind sites. Such a corridor would have the potential to mitigate the route deviation impacts of offshore wind developments in the region and provide an alternative route that would allow vessels to avoid potentially unsafe courses close to the coastline or further offshore.
5. We have previously raised concerns regarding the “L” shape of the Inch Cape boundary. Any vessel on a southbound course navigating to the east of the site has the potential to be met with head-on rows of turbines. Advice should be sought from the MCA and NLB on suitable mitigation measures, including marking and lighting, to reduce the navigational risks to tolerable levels in such a case.
6. We are particularly concerned that any preferred adverse weather routes may no longer be available due to the development of offshore wind farms in the area. Since vessels may be pushed further offshore or closer to the coast in heavier weather, the increase in risk should be assessed and mitigated. Again, a corridor between sites may help to mitigate the impacts.
7. We remain concerned over the potential compression of traffic between the Inch Cape western boundary and Bell Rock and the potential for vessels to be forced west of the Rock and closer to the coast. While the NRA has deemed navigational safety risks to be tolerable in this regard, we request that the UK Chamber’s concerns are noted.

In summary, the cumulative development of the Inch Cape, Neart na Gaoithe and Firth of Forth Round 3 offshore wind projects has the potential to significantly reduce available sea room in the region, leading to increases in navigational safety risks and negative commercial impacts on shipping due to route diversions. We have previously discussed the possibility of a regional study with both Marine Scotland and the project developers to help identify additional mitigation options and would very much welcome the opportunity to explore this further. Should you wish to discuss any of the points raised in this letter in greater detail, please do not hesitate to contact me.

Yours faithfully,



Manager – Offshore