

9 August 2013

Laura Morley,  
Marine Renewables Licensing Advisor  
Marine Scotland – Marine Planning & Policy Division  
Scottish Government  
Marine Laboratory  
PO Box 101, 375 Victoria Road  
Aberdeen AB11 9DB

Dear Ms Morley,

### **Inchcape Offshore Ltd Application**

Although RYA Scotland has no objections to Inchcape Offshore Ltd's consent application, we make two comments.

1. There is inconsistency in the width of the key gap between the development area and the Bell Rock. In 19.5.1 section 42 it is given as about 4 nautical miles whereas Figure 19.1 in 7.13 suggests the gap is 8 nautical miles. We assume that the former is the case.
2. Section 19.6.2 paragraph 142 states that 'During the operation and maintenance stage of the Wind Farm, recreational vessels will be required to either deviate around the Development Area or pass between Inch Cape Structures (when conditions allow). There is a risk to recreational vessels transiting through the Development Area of alliding with an Inch Cape Structure, especially in adverse weather and poor visibility. Recreational vessels will also be affected by displaced commercial vessels and fishing vessels, therefore increasing the vessel to vessel collision risk.' The first sentence is unclear and seems inconsistent with section 7.13.2. It could be construed as meaning that temporary exclusion zones could be implemented at short notice or even that vessels could be directed to travel through the wind farm, which we feel sure was not the intention. The RYA would oppose any attempt to implement any safety zone in the operational phase that is not supported by a compelling risk analysis and an explanation of the measures that would be implemented by the operator to enforce it. It must be remembered that GNSS navigation systems are typically only accurate to 10 to 50 m and that small craft of less than 13.7m LOA are not required to carry VHF. It is the skipper's responsibility to plan a safe passage depending on the prevailing conditions, taking account of information published in hydrographic charts and Sailing Directions, Pilots and Notices to Mariners. This is a tried and tested system that works for all other aspects of navigation.

Yours faithfully,



Planning and Environment Officer, RYA Scotland