

ANNEX 5A

Table A1 Summary of Consultation Responses to Offshore Wind Farm Scoping Report

Consultee	Response Summary
Aberdeenshire Council	Based on the Scoping information submitted, there are no issues of direct concern affecting Aberdeenshire Council. Internal colleagues consulted included Roads, Environmental Health, Environment Team, and Archaeology. The Scoping Document referred to further applications for the onshore works and, if these affect Aberdeenshire, appropriate comments will be made at the appropriate time. Aberdeenshire Council wish to be kept informed on development progress.
University of Aberdeen (Aberdeen Lighthouse Field Station – Marine Mammals)	<p>p43 of Scoping Report - Clarifies the position regarding offshore sightings of bottlenose dolphins - most of the dolphins occurring offshore more likely to be common or white-beaked than bottlenose, but not necessarily saying that offshore sightings of bottlenose were 'mis-counts'. Data gap.</p> <p>p45 - C-PODS can say nothing about minke whales as they don't echolocate.</p> <p>p44 - physical structures unlikely to be much of a barrier effect to marine mammals. Possibility of acoustic barrier if operational noise is an issue.</p> <p>Additional impact to consider (for birds also) is the potential indirect effect of the physical structures on fine scale hydrography and how this affects tidal mixing and prey availability on Smith Bank. Work at Horns Rev has shown how these fine-scale tidal features influence harbour porpoise feeding.</p> <p>Acoustic surveys, drop down video or baited cameras may also be appropriate for fish sampling as well as trawling, as sand eels are key prey for birds and marine mammals.</p> <p>MMOs on year-round boat surveys unlikely to add much to knowledge of marine mammals in the area. Data collected could be misleading unless sightings can be verified or surveyors are sufficiently experienced to accurately identify cetaceans or recognise when they cannot assign to species.</p>
Association of District Salmon Fisheries Board	<p>There is an economic importance and ecological importance of these fisheries and natural designations, due to this special status any potential impacts on these require to be carefully assessed. Moray Firth is also particular stronghold for sea trout. There may be potential effects of offshore installations on migratory salmonids in their marine phase. ASFB would want the following raised:</p> <ul style="list-style-type: none"> - The effect would the construction processes have on fish - What are the effects of underwater noise and vibration - Effects on fish of water quality changes - Will there be any electrical or magnetic fields during operation - Any changes in habitat - Risks of more prolonged integration with sea trout.
Atlantic Salmon Trust	No response to Scoping.
Caithness and North Sutherland Regeneration Partnership	No response to Scoping.
Caithness Petroleum	No response to Scoping.

Consultee	Response Summary
Chamber of Shipping	<p>The Scoping Report only presents navigational density data when illustrating the level of shipping in the area. AIS and radar data collected during the Traffic Surveys will need to be presented in order to fully assess the types of vessel operating in the area.</p> <p>The Scoping Report does not take into account the Moray Firth Round 3 wind farm zone, which lies adjacent to the proposed Beatrice site. The cumulative and in-combination effects of both sites on shipping displacement and navigational safety should be fully taken into account during the EIA.</p> <p>The proposed site is likely to force some medium density levels of shipping to the west closer to the coast. The EIA should seek to assess the risk posed to these vessels by the squeezing of shipping lanes. The location of the wind farm site should not restrict navigational route options to a point where the risk to safety becomes unacceptable.</p> <p>Potential increases in steaming distances caused by development of the site should be calculated. These increased distances will impact upon fuel consumption, GHG emissions and trading costs, all of which can negate any benefits provided by the wind farms. Additionally, future increases in shipping density should be taken into consideration when determining whether the reduction in space for vessel traffic is acceptable.</p>
Civil Aviation Authority	<p>Potential impact upon helicopter operations associated with offshore platforms. Consultation should be conducted with local helicopter and platform operators to quantify the scale of such impact upon helicopter operations.</p> <p>Also, wider ranging NATS radar related issues that need to be assessed. Developer should consult NATS.</p> <p>Potential impact upon operations associated with Wick Airport. Contact details provided to consult with Wick Airport.</p> <p>Some or all of the wind turbines will need to be equipped with aviation warning lighting. Requirements can be discussed further with Mark Smailes of DAP.</p> <p>International aviation regulatory documentation requires that the rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines that are deemed to be an aviation obstruction should be painted white, unless otherwise indicated by an aeronautical study.</p> <p>There would be a requirement for the Beatrice Offshore Wind Farm to be charted for aviation purposes. Defence Geographic Centre should be kept fully appraised of the wind farms development.</p> <p>As and when construction time frames are established specific consultation with the CAA should be conducted.</p> <p>Landfall developments would not anticipate needing to make any observations other than to highlight any potential need for consultation to identify aerodrome specific safeguarding issues.</p>
Cromarty Firth Port Authority	No concerns as to the effect on shipping activities in the Cromarty Firth. Wants to be kept informed about onshore elements and exclusion zones around wind farm.
Department of Energy and Climate Change (Aberdeen)	No response to Scoping.

Consultee	Response Summary
Friends of the Earth Scotland	No response to Scoping.
Highland Council	<p>Landscape, Seascape Visual Impact Assessment - The DTI 2005 Guidance should be used and the Council's preference would be for photography taken with 80mm lens on 35mm full frame SLR camera. The Council are currently looking to use a digital panoramic viewer for accurately evaluating views from specific viewpoints and this could be particularly useful in presentations to the public and for cumulative assessment.</p> <p>Council has a database of all wind farm proposals in Highland area - http://www.highland.gov.uk/NR/rdonlyres/7D7C8DC6-3791-49D3-B0A4-448EA69221F9/0/highland_wind.pdf.</p> <p>Viewpoints should be agreed with council at an early stage.</p> <p>Also of particular interest to the Council will be the impacts on possible locations for onshore assembly of equipment and turbine components and possible impacts on any ports used for transhipment. You will be aware that the Council has particular aspirations for the Nigg fabrication yard in this respect.</p>
Highlands and Islands Airports (Wick and Inverness)	<p>Initial assessment indicates that this proposal would appear to impact on the Instrument Approach Procedures to Runway 31 for Wick Airport. If the northern boundary was to be positioned further to the south west, then it is likely that there would be no impact on the current published procedures. A more precise location and height of the turbines would enable a more detailed assessment to be made, and HIAL can arrange for an assessment against the instrument approach procedures to be carried out. Any assessment of, or changes to, the Instrument Approach Procedures, are likely to attract a cost. Additional consultation required to provide precise location and height of turbines.</p>
Highland and Island Enterprise	No response to Scoping.
Historic Scotland	<p>No designations within its statutory remit located within the identified area or within the immediate vicinity of the proposed area.</p> <p>Scoping Report identified various undesignated wrecks to be assessed, with appropriate involvement of archaeological expertise and in consultation with the Council Archaeological Service, as they could be subject to potential direct impacts, depending on the sub-sea cabling route. Additionally, indirect impacts to historic assets on the seabed or coast edge within the proposed development area and possibly beyond should be assessed.</p> <p>HS note the scoping document's reference to the low potential for submerged prehistoric remains within the study area, and would encourage archaeological analysis of the geotechnical surveys which they understand are to be gathered.</p> <p>When potential direct impacts on terrestrial assets are addressed separately they shall provide further comments. There are terrestrial assets with a seascape setting, which maybe subject to an indirect impact. HS is content with the visualisations and consider it unlikely that the development shall have a significant adverse impact on terrestrial assets.</p> <p>A cumulative assessment should be undertaken.</p> <p>Unlikely that there shall be significant adverse impacts on marine assets within their statutory remit.</p>
Ithaca Energy	No response to Scoping.

Consultee	Response Summary
Joint Nature Conservation Committee	SNH and JNCC provided a comprehensive joint response. The comments from this response have been summarised in Table A2.
Marine Conservation Society	No response to Scoping.
Marine Safety Forum	No response to Scoping.
Marine Scotland	Marine Scotland provided a comprehensive response to the Scoping Report. The comments from this response have been summarised in Table A3.
Maritime and Coastguard Agency	OREI markings should conform to the "spreadsheet" layout and MCA are unsure how this will be achieved from current diagrams. MCA require the Marine Environmentally High Risk Areas on adjacent coastlines to be mentioned and the Annual Mean Significant Wave Height Chart to be completed. There is a concern that Airborne Noise and pipelines and cables topics have been scoped out.
Ministry of Defence, Safeguarding Officer	<p>Not a direct response to scoping.</p> <p>MoD has concerns with turbines 1 - 4 as submitted in pro-forma. The turbines will be approx 65km from, in line of sight to, and will cause unacceptable interference to the ATC radar at RAF Lossiemouth.</p> <p>MoD is willing to enter discussions with the developer with the aim of finding suitable mitigation. Research and financial responsibility rests with the developer.</p> <p>MoD will request the turbines be fitted with 200cd omni-directional aviation lighting.</p> <p>Response is based on current levels of wind farm development in area.</p>
The Moray Council	<p>TMC agree with the conclusions set out in section 3.6 as to which topics should be assessed and which topics should be scoped out.</p> <p>The list of "Scoping Report Consultees" identifies a broad range of interest groups but are mainly national bodies and the Council would expect the consultation exercise on the detailed proposals to extend to a more local level including community councils, harbour user groups and local fishing and tourism interests.</p> <p>Welcome details of viewpoints to be selected as part of the landscape and visual impact assessment, relevant to Moray.</p> <p>Would also welcome clarification of how the electricity generated will be converted to High Voltage Direct Current for transmission to the national grid. The Council has recently processed an application for a convertor station at Blackhillock, near Keith as part of a project to transmit electricity from Shetland to the Scottish mainland and would like to know if Beatrice project link into this project?</p>
Moray Firth Inshore Fisheries Group	<p>MFIFG Executive Committee has not yet had an opportunity to collectively consider issues. Points identified will be discussed at a future MFIFG meeting.</p> <p>Seems counter intuitive that environmental impacts of sea bed cabling not considered in Scoping Report but will be considered in ES. Impact of sub-sea cabling will be one of the key issues relating to operations of the fisheries industry. Appreciated that this aspect will not be developed by BOWL but is clearly directly linked to the operation of the wind farm. Should also be considered in cumulative impacts.</p> <p>Indicative layout does not appear to allow accommodation of navigation channels e.g. fishing vessel access on an East/West basis. EIA should identify ways to</p>

Consultee	Response Summary
	<p>minimise impacts on movements of vessels actively fishing. Operational exclusion zones must be evaluated in EIA.</p> <p>During various stages of development the entire site will be utilised and potentially out of bounds to fishing vessels or impacting on commercial fish stocks.</p> <p>Potential impacts of meteorological masts should be considered as part of EIA.</p> <p>Sediment loading issues (during construction and also operational impacts of structures impacting water flow rates and leading to settlement of suspended sediment) must be taken into account in EIA as juveniles King scallops can be susceptible to smothering by mobile sediments. Impact of habitat loss on recruitment of juveniles to the adult fishery should also be considered.</p> <p>Potential for EMF impacts (when electricity passed through cables) on commercial fish and shellfish species and elasmobranches. Any heating effect from the BOWL sub-sea cabling network and the OFTO arrangements for sub-sea connection cable should form part of EIA. Including impacts on starfish abundance and associated impacts on commercially exploited shellfish species.</p> <p>Outer Moray Firth has become increasingly important for the squid fishery. Smith Bank is a spawning area.</p> <p>Use of average landings figures runs risk of undervaluing importance of certain fisheries which may be cyclical e.g. squid. Any displacement of fishing effort from the scallop or squid fisheries on Smith Bank is likely to negatively impact other areas in Moray Firth.</p> <p>There is an important high value hand-line fishery for mackerel managed as part of the North Sea stock through a quota allocation of 300 tonnes per annum. Need detailed engagement with fishing industry to ensure accurate fisheries statistics.</p> <p>Mitigation measures to allow continued access to stocks on wind farm site likely to be best route to minimise impacts on fishing industry.</p> <p>MFIFG wish to be informed as project and EIA progresses.</p>
Moray Firth Partnership	<p>MFP has over 640 individual and corporate members and therefore cannot comment on behalf of its members.</p> <p>MFP aims to alert members and wider public to issues, such as this consultation, so that members can comment themselves or raise issues through MFP. MFP can also facilitate public consultation meetings.</p> <p>MFIFG should be added to list of info sources.</p> <p>Shipping and Sailing Route map (Fig 3.17) should be amended to show correct town name of Wick (currently shown as Cromarty).</p> <p>MFG would hope that future public consultations may be carried out for the BOWL and MORL sites in tandem.</p> <p>MFP have been carrying out a desk based survey of marine traffic in Moray Firth in 2008. Copy will be provided when complete.</p>
Moray Firth Partnership SAC Group	No response to Scoping.
Moray Firth Sea Trout	The direct impact of the prolonged construction noise on sea trout when they are

Consultee	Response Summary
Project	<p>trying to feed on the Smith Bank.</p> <p>That the construction and operation of the Beatrice development does not disrupt the key fish and sea trout prey habitat of the Smith Bank.</p> <p>The electro-magnetic effects from the power cabling may disturb migratory pathways for sea trout.</p>
NERL	No response to Scoping.
Northern Lighthouse Board	<p>Content with the guidance documents and consultees listed with respect to navigational studies. Agree that Notices to Mariners, Radio Navigation Warning and publication of appropriate bulletins broadcasting development updates must be released prior to commencement of the project.</p> <p>A Statutory Sanction of the Commissioners of the Northern Lighthouses must be sought to deploy, exhibit and subsequently remove any proposed navigational lighting or buoy stations required to establish the Beatrice Offshore Windfarm.</p> <p>Any marking and lighting recommendations will be made in a formal response through the Coast Protection Act 1949: Section 34 consultation process, and will be based on IALA Recommendation O-139. Would anticipate that the CPA application would include a Navigational Risk Assessment in accordance with MCA Marine Guidance Note 371 with a separate comment on the requirement to install cables to shore.</p>
PA Resources UK Ltd	No particular comments or observations. Be aware that the intended seismic surveys planned by PA Resources and Caithness Petroleum for September 2010 did not go ahead and PAR are currently awaiting permission from DECC to proceed in future.
RNLI	No response to Scoping.
Royal Yachting Association Scotland	<p>Email requesting details of what has been submitted to the Hydrographic Office for Navigational Purposes and any prohibited areas, together with the clearance under the blades at HWS. Can yachts navigate through any part of the area or have they to go round buoys marking it?</p> <p>What are the characteristics of any buoys marking the area and their position. Wish to circulate this info to all Moray Firth Yacht Clubs.</p> <p>A full Navigational Risk Assessment is required.</p>
RSPB	<p>RSPB welcomes the intention to collaborate with MORL over cumulative impacts assessment. There may also be a need for cumulative assessment of bird impacts on various SPAs to consider impacts arising from other offshore development especially, but not limited to, wind in the case of seabirds.</p> <p>Should there be impacts on other species (e.g. migratory swans, geese and ducks) then consideration of cumulative impacts from land-based wind farms may also need to be considered. There may be a need for a cumulative assessment of bird impacts on Special Protected Areas to consider impacts arising from other offshore developments especially, but not limited to, wind in the case of seabirds.</p> <p>EIA should consider likelihood of seabirds and migrant landbirds using lattice-design sub-structure towers and anemometer masts as perches if exposed above wave height, and whether this could lead to increased likelihood of collisions.</p> <p>Welcome commitment to carry out 2 years of monthly ship-based bird surveys.</p>

Consultee	Response Summary
	<p>Radar studies to elucidate activity during bad weather or at night will also be needed, including assessment of collision risk.</p> <p>Extent to which birds may be excluded from what is likely to be an important feeding area should be addressed.</p> <p>Assessment must also be made of collision risk, to include consideration of the effects on the energetics of flying birds, should they modify their trajectory or altitude to avoid turbines including during adverse weather and visibility.</p> <p>Important fishing area for seabirds. If fishing vessels are to be excluded from area, any secondary impacts on seabirds should be considered.</p> <p>Consideration of impacts on SPA populations should take account of the fact that many seabird species have had a run of very poor breeding seasons.</p> <p>Studies should be sufficient to attribute seabirds to particular SPA breeding sites e.g. radar, remote sensing, tagging. It will have to be demonstrated, beyond reasonable scientific doubt, that no adverse impact on site integrity will occur. As it cannot be discounted that the proposal will not have a significant effect on the East Caithness Cliffs SPA (at least), an appropriate assessment will be required.</p>
Scottish Enterprise	No response to Scoping.
Scottish Environment LINK	No response to Scoping.
Scottish Environment Protection Agency	<p>Scoping report is thorough and generally addresses all the issues relevant to SEPA.</p> <p>Would encourage consideration of producing a single ES which covers all aspects of the proposed development (e.g. connector cabling and onshore work).</p> <p>No objection to proposal to scope air quality out of the assessment.</p> <p>ES should consider potential impact on local water quality. Request that a dedicated pollution prevention section is provided in ES.</p> <p>Recommend submission of an outline Environmental Management Plan (EMP).</p> <p>Proposals for water quality monitoring must be set out in ES.</p> <p>SEPA response also provides comments on issues that should be addressed under the Water Framework Directive, for any aspect of the scheme located within 3 nautical miles of the MHWS mark, due to consideration of hydromorphological pressures in coastal water bodies under the WFD.</p> <p>Details of how waste will be minimised at construction stage should be included in ES. Recommend that a site specific water management plan is developed.</p> <p>Recommend that it would be useful to consult MarLIN as well as NBN re nature conservation interests.</p>
Scottish Fisherman's Federation	No response to Scoping.
Scottish Government (Energy Division)	No response to Scoping.
Scottish Hydro Electric Transmission Ltd	No response to Scoping.

Consultee	Response Summary
(SHETL)	
Scottish Natural Heritage	SNH and JNCC provided a comprehensive joint response. The comments from this response have been summarised in Table A2.
Scottish Wildlife Trust	No response to Scoping.
Sea Mammal Research Unit	No response to Scoping.
Talisman Energy (UK) Ltd	Have reviewed the Scoping Report and have no comment.
The Crown Estate	No response to Scoping.
Visit Scotland	No response to Scoping.
Whale and Dolphin Conservation Society Scotland	No response to Scoping.

ANNEX 5A

Table A2 Summary of SNH and JNCC Consultation Responses to Offshore Wind Farm Scoping Report

Topic Area	Response Summary
General Advice	<p>Due to the close proximity of this proposal with the Moray Firth Round 3 zone, we strongly encourage collaboration between the developers and close communication with Marine Scotland, SNH and JNCC.</p> <p>The Response may be subject to change depending on the findings of the final published Scottish territorial waters SEA.</p> <p>Concerned that the onshore elements of this development are not addressed in the scoping report. We highlight that we wish to see information on both onshore and offshore elements together.”</p> <p>Key natural heritage interests and onshore elements of the development should be scoped into the EIA. There is currently no information on cable landfalls or grid connections – no options appraisal or consideration of potential locations/routes and installation methods or details of port facilities lay down areas, transport routes or other aspects of construction activities.</p>
Project Planning, Phases of Development & Consultees	<p>The following phases of development should be assessed in the Environmental Statement:</p> <p>Construction Operation and Maintenance Repowering Decommissioning</p> <p>The consultee list in Scoping Report appears comprehensive.</p>
General - Landscape and Visual	<p>The approach described in the ‘Guidelines for Landscape and Visual Impact Assessment’ (LIIEMA, 2002) should be used.</p> <p>SNH recommends that BOWL checks and discusses local landscape designations with Highland Council.</p> <p>Viewpoints should be selected in negotiation with statutory consultees – for Beatrice this includes the Highland Council, Moray Council and SNH. Other recommended references include the following:</p> <p>An assessment of the sensitivity and capacity of the Scottish seascape in relation to windfarms, SNH, (2005) Guide to Best Practice in Seascape Assessment, CCW, (2001) Siting and Designing Windfarms in the Landscape, SNH, (2010) Guidance on Landscape/Seascape Capacity for Aquaculture. Natural Heritage Management, SNH (2008) Visual Representation of Windfarms - Good Practice Guidance Historic Scotland – GDL advice Cumulative Effect of Windfarms</p>
General - Fisheries	<p>Consultation should be sought with the relevant Inshore Fisheries Group (IFG), Marine Scotland Science and CEFAS.</p> <p>SNH considers it unlikely that an individual offshore wind development will have significant impacts on spawning events or nursery grounds on the scale of the Scottish coast. SNH suggests it will be necessary for the cumulative impacts to be assessed to inform appropriate restrictions.</p>

Topic Area	Response Summary
Designated Sites & Species Protection	Marine Protected Areas may become a consideration in the near future. BOWL should liaise with Marine Scotland over this aspect and SNH will seek to keep BOWL informed as to their own input to the progress of MPAs.
Cumulative Impacts	<p>SNH welcomes the collaborative approach proposed with MORL. Topics SNH considers need cumulative assessment include the following issues.</p> <p>Landscape and Visual Fisheries (spawning and nursery grounds) Ornithology Marine Mammals Fish of Conservation Concern Coastal Processes</p>
Offshore Elements - Benthic Ecology	In principle, SNH considers the proposed surveys for benthic ecology are adequate, however, it will need to see more detail on finalised methodologies prior to work starting.
Offshore Elements - Ornithology	<p>It is recommended that whooper swan and nocturnal species are added to the assessment list. Far-ranging species and associated SPAs should also be considered in assessment (gannet, fulmar etc).</p> <p>Clear cumulative impact methodology will need to be agreed.</p> <p>For boat based surveys SNH recommends that there is a minimum of three bird surveyors and one marine mammal observer (dedicated to that task) and that observers are suitably trained (ESAS training for birds) and experienced (at least one ESAS trained observer with at least 50 hours, preferably more, of survey experience). Review of data and data gathering approaches should be undertaken regularly.</p> <p>Tracking studies are recommended (SPA species).</p> <p>Habitat modelling is recommended.</p> <p>Collision Risk Modelling is recommended.</p> <p>Assessment of construction and operational noise impacts on seabirds is recommended.</p>
Offshore Elements - Marine Mammals	<p>Cumulative impacts are a key concern of SNH and they recommend BOWL works closely with MORL during the assessment, in proposing construction timetables and mitigation measures.</p> <p>Scoping Harbour seal decline in numbers is a concern and must be considered in the EIA.</p> <p>BOWL needs to make it clear to SNH why it is undertaking survey work for marine mammals, and what questions are hoping to be answered with the data collected. This is also the case in relation to the surveys, modelling and assessment proposals for noise / vibration impacts. SNH would welcome early discussions on these issues to ensure agreement is made at an early stage.</p>

Topic Area	Response Summary
Offshore Elements - Fish of Conservation Concern	<p>BOWL and MORL should collaborate to address the possible cumulative and 'in combination' effects on fish of conservation concern as listed below:</p> <p>SAC species such as Atlantic salmon, lamprey and freshwater pearl mussel Adult Atlantic salmon and post smolt Atlantic salmon Freshwater pearl mussel Sea lamprey European eel</p> <p>The assessment should also consider impact during construction, operational noise and electromagnetic effects.</p>
Offshore Elements - Hydrodynamic Processes & Coastal Geomorphology	<p>There may be a wave shadow effect and tidal current reductions within the array. They strongly recommend that the BOWL / MORL collaborate on their coastal processes modelling in order to consider these aspects. Cabling options should also be subject to such assessment.</p>
Onshore Elements	<p>As discussed in the covering letter, SNH highlight the lack of information in respect of onshore elements.</p>

ANNEX 5A

Table A3 Summary of Marine Scotland Consultation Response to Offshore Wind Farm Scoping Report

Topic Area	Response Summary
Land Use Planning	The Scottish Government's planning policies are set out in the National Planning Framework, Scottish Planning Policy, Designing Places and Circulars. Planning documents relevant to the Beatrice Wind Farm include: PANs 42, 45, 50, 51, 56, 58, 60, 62, 68, 69, 75 and 79 Marine Guidance Notes 371 (M) The Highland Structure Plan West Highland and Islands Local Plan (WHILP)
Natural Heritage	Scottish Natural Heritage (SNH) produced a service level statement (SLS) for renewable energy consultation, regarding the level of input that can be expected from SNH in the EIA process. Available online (www.snh.org.uk), the SLS with a detailed reference list, should be considered as part of the EIA process.
Economic benefit	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.
Archaeology and Cultural Heritage	Both direct impacts on the resource itself and indirect impacts on its setting must be addressed in any EIA undertaken for this proposed development.
Navigation	The ES should supply details of the possible impact the development may have on navigational issues for both commercial and recreational crafts including collision risk, navigational safety, risk management and emergency response, marking and lighting of tidal sites and information to mariners, effects on small craft navigational and communication equipment, weather and risk to recreational crafts which lose power and are drifting in adverse conditions, evaluation of the likely squeeze of small crafts into routes of larger commercial vessels and visual intrusion and noise.
Ecology, Biodiversity and Nature Conservation	In terms of the SG Interim Guidance, applicants must give serious consideration to meeting the three fundamental tests set out. It is advised that applicants give consideration to this immediately after the completion of the scoping exercise. It needs to be categorically established which species are present on the site, and where, before the application is considered for consent. The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the application process.
Birds	Maps should be provided to show the extent of the surveys outside the wind farm footprint. Cable route and layout – include maps, baseline data and details associated with the cable route within the ES and the overall footprint of the works.
Benthic surveys	MS-LOT welcomes sight of the finalised methodology before the grab, beam trawl and TV surveys commence; acoustic survey information used to develop seabed habitat map; reference to JNCC biotope within section 3.3.3 Seabed Marine Life required and the communities discussed need to be defined and described in more detail.

Topic Area	Response Summary
Natural fish ecology	More recent/site specific information required with regards to fishery sensitivity maps to identify maximum spawning and nursery habitat; finer scale sampling would be required to provide robust advice on the relevance of the proposed areas for juvenile cod.
Commercial fisheries	VMS fishing effort should be used to evaluate the importance of the area to scallop dredgers; an assessment that adequately considers the smaller fishing fleets required is required and the developer should contact Moray Firth Inshore Fisheries Group and discuss any concerns associated with future developments and how they will affect lobster stocks and fisheries in the area. Cumulative and in combination effects – detrimental effects on stocks or fisheries elsewhere should be considered as part of the Habitats Regulations Assessment.
Water Environment	Pollution prevention and clean-up measures should be considered for construction, operational and decommissioning stages. The ES should identify the location of any protective/mitigation measures in relation to private water supplies which may be impacted by the scheme.
Construction	Construction – an assessment of the extent and degree of damage likely to be expected on intertidal mudflats during the construction of the turbines and the laying of the cable; other less disturbing methods than laying inter-turbine cables by trench should be considered within the ES; details of noise pollution effects on cetaceans/pinnipeds/fish; impacts on migratory fish (physical or avoidance reactions and also avoidance due to electromagnetic sensitivity); a monitoring strategy, if impacts are uncertain.
Other Material Issues	The ES should provide information relating to the preferred route options for delivering equipment etc via the trunk road network. The EIA should also address access issues, in particular potential stress points at junctions, approach roads, bridges, site compound and laydown areas etc.
General ES Issues	<p>In the application for consent, the applicant should confirm whether any proposals made within the ES form part of the application for consent, e.g. for construction methods.</p> <p>The ES must be provided in a user-friendly PDF version, directly to consultees along with a description of the methodology used in assessing all impacts. It is recommended that, within the ES, qualifications and experience of those involved in collating, assessing or presenting technical information is provided. Energy Consents Unit requires eight hardcopies to be issued internally to Scottish Government consultees.</p> <p>Where section 36 applications are located in areas where Gaelic is spoken, the project details should be published in both English and Gaelic.</p> <p>The NTS should be written in simple, non-technical terms to describe the various options for the proposed development and the mitigation measures against the potential adverse impacts which could result. Elaborating on the mitigation measures is particularly important.</p> <p>A detailed OS plan showing the site boundary and all turbines and onshore supporting infrastructure should be presented in a format compatible with Scottish Government’s Spatial Data Management Environment, along with appropriate metadata.</p> <p>Developers should outline the experiences or practical difficulties encountered when collating/recording additional information supporting the application as well as provide a reference of any omitted information along with an indication of</p>

Topic Area	Response Summary
	<p>when an addendum will be submitted.</p> <p>An impact matrix to lay out the potential impacts of each phase of the development is recommended.</p> <p>Annex 2 presents a developer application and environmental statement checklist which will be used by officials when considering acceptance of formal applications.</p>

ANNEX 5A

Table A4 Summary of Consultation Responses to Onshore and Offshore Transmission Works Scoping Report

Consultee	Response Summary
Association of District Salmon Fisheries Board	No response to scoping
Atlantic Salmon Trust	No response to scoping
BT Radio Connection	No telecomms interference to present or planned works.
Caithness and North Sutherland Regeneration Partnership	No response to scoping
Caithness Petroleum	No response to scoping
Chamber of Shipping	No response to scoping
Civil Aviation Authority	No aviation issues regarding cable.
Cromarty Firth Port Authority	No response to scoping
Defence Estates	No objection. Provide info on cable route laying timetables when available
Department of Energy and Climate Change (Aberdeen)	No response to scoping
HSE	EIA should not conflict with the Health and Safety at Work Act 1974.
Highlands and Islands Airports (Wick and Inverness)	No response to scoping
Highland Council	No response to scoping
Highland and Island Enterprise	No response to scoping
Historic Scotland	Marine Archaeology (Offshore) - Archaeological analysis of geophysics in required in line with Historic Scotland guidelines. Also analysis of any geotechnical surveys gathered for EIA purposes. Any information gathered could make a positive contribution to records.
Historic Scotland	Terrestrial Archaeology (Onshore) - Strongly advises the cultural setting is assessed separate to LVIA. Include assessment of Inventoried Gardens and Landscapes. Report error in the scoping report which states there are no Inventory sites. Refers to Cullen Gardens which is in the study area. Recommends contacting Moray Archaeologist re unscheduled archaeology and Aberdeenshire archaeologists

Consultee	Response Summary
Inshore Fisheries Group	<p>Fish/Benthic Note the scoping doesn't cover the converter station.</p> <p>State lack of clarity of the form of electrical energy transmission AC or DC and associated EMF impacts. Need to consider further the effect of EMF with migration of shellfish stocks and reproductive capacity. Elasmobranch species may be sensitive to EMF.</p> <p>Recommends king scallop be added to the list of important species. Inshore water are also important for squid and stresses the seasonal component of their spawning. Juvenile scallops and associated habitat maybe smothered and this should be considered.</p> <p>Impact on demersal and pelagic fish is likely to be small and is scoped out. Shellfish stocks should not be scoped out further and should be in EIA. Lobster spawning should be considered plus squid and cephalopod molluscs.</p> <p>Commercial Fishing - No one area would be expected to be excluded to access to fishermen for extended periods. Issue of mobile gear safety associated with cable protection measures or disturbance of the sea bed. Refers to exposure of clay boulders and use of protection to allow for safe passing of fishing gear. Timing of construction to avoid times when mobile gear is used should be planned to avoid this.</p>
Ithaca Energy	No response to scoping
JRC	No telecomms issues anticipated but keep informed.
Joint Nature Conservation Committee	No response to scoping
Local Community Councils	No response to scoping
Maritime and Coast guard Agency	<p>Design - Optimum cable route does not appear logical. Please expand on explanation.</p> <p>Navigational Risk Assessment should focus on areas where shipping routes cross the path of the cable. NRA should be undertaken in line with the guidance with particular reference to the Burial Protection Index.</p>
Marine Safety Forum	No response to scoping
Marine Scotland	Design/Ecology/Fish - Notes varying methods of installation. Explain how options will impact on the environment and differences in EMF with sensitive species.

Consultee	Response Summary
Marine Scotland	<p>Coastal Processes Queries accuracy of text and figures relating to co-tidal chart and tide ranges. Queries the accuracy of the tidal speeds and whether these are inferred or representative of the whole corridor. Provide current depths.</p> <p>Queries use of term of land-water interface</p> <p>Clarification required on Wave regime re instantaneous significant wave heights.</p> <p>Clarify if met ocean equipment is already deployed or whether they will be deployed. How long will they be deployed for. What is an AWAC frame and what does it measure and how this is used in the assessment</p> <p>Tabulate outputs of impact assessment</p> <p>Investigate changes to sediment transport processes as a result of wind farm and cables. Levels of suspended particular matter should be predicted or modelled. If levels are predicted to change the EIA should consider how this would impact on physical and biological receptors.</p> <p>When considering EMF impacts consider the maximum field and thermal load if the turbines were shut down. Useful to map <i>Modiolus</i> along the cabling route. Interesting to see if <i>Arctica</i> appear on the benthic surveys. Potential changes in the sediments should be considered. Sediment samples should be collected for particle size and chemical analysis. Cable route should be towed using a sled and analysed by benthic specialists. Reference Witbaard R et al 2003 re <i>Arctica</i></p> <p>Fish Ecology Marine Scotland believe there is a key nursery ground for cod at the site. Also refers to Herring, Sandeels and Diadromous and freshwater fish</p> <p>Marine Mammals Calculate EMF effects of cables on natural fields. Method and info required if presented. The changes should be compared to the known sensitivity of mammals.</p>
Moray Council	No response to scoping
Moray Firth Inshore Fisheries Group	No response to scoping
Moray Firth Partnership (and SAC Group)	No response to scoping
NATS	No impact on civil aviation
Network Rail	No response to scoping
Northern Lighthouse Board	Shipping and navigation: Bulletins are required as to the nature and timescales of works to safeguard navigation. Depending on the location it may be necessary to mark the landfall location.

Consultee	Response Summary
PA Resources	No response to scoping
Royal National Lifeboat Association (RNLA)	No response to scoping
Royal Yachting Association (Scotland)	No impact on recreational users expected.
RSPB	<p>Consider impact on sandeels not only as a receptor but as a food source for sea birds. Impact on pelagic fish populations should therefore not be scoped out and should be assessed.</p> <p>Considering impacts on coastal SPA's should consider potential displacement during construction and decommissioning which should not be scoped out of the assessment</p>
Scottish Enterprise	No response to scoping
Scottish Environment LINK	No response to scoping
Scottish Environment Protection Agency (SEPA)	<p>General</p> <p>Some of the issues referenced can be scoped out and where this is relevant should be noted in the ES.</p> <p>Construction Environmental Management Plan Document and Pollution Prevention is needed to implement best practice.</p>
	<p>Design</p> <p>BOWL and SHETL should develop opportunities to share trenches and combine cabling to reduce the footprint.</p>
	<p>Hydrology</p> <p>Water Framework Directive and River Basin Management Planning. Note the WFD in Scotland is applicable up to 3 nautical miles from baseline. WFD: Offshore abstractions and discharges. Offshore water quality inc. bathing waters and shellfish. Consideration should be given to existing discharges. Consider water abstractions and avoid water abstraction points.</p> <p>WFD requirements to avoid works in the water environment. Where crossings are required they should avoid bed and banks of watercourses. Avoid use of culverts. Plans for any in water works should be provided (guidance on requirements if in water works are required). Reference to best practice guidance on water crossings.</p> <p>Guidance on requirements for avoiding groundwater disruption through in ground works i.e. cable laying, borrow pits.</p> <p>Consideration given to flood risk and flood risk guidance and an FRA undertaken as appropriate.</p>
	<p>Coastal Processes</p> <p>Potential need for hydrodynamic modelling to predict impact of construction activities on water quality. Impacts on suspended sediment should consider the Shellfish Waters Directive and mitigation should be detailed in the ES. The baseline of the ES should consider: Sediments; Hydrodynamics (waves and tidal); Sedimentary environment; Sedimentary structures and Suspended sediments.</p>
SEPA	

Consultee	Response Summary
	<p>Marine Ecology Consider UK BAP species, Include Priority Marine Features, Introduction of non-native species on vessels etc.</p> <p>Terrestrial Ecology Reference to invasive non-native species and the Deveron District Bio-Security Plan. Note North East Scotland BAP should be considered not just Moray Council BAP. Refers to wetland and peatland ecology and need to survey (Phase 1) and NVC on any wetlands identified. Avoid wetlands and bog in the design. Reference to peatland.</p> <p>Transport/ Air Local Air Quality issues relating to increased traffic and construction dust.</p> <p>Noise and Vibration Management of nuisance of construction works.</p> <p>Waste Include best practice in line with legislation and using envirowise guidance in Construction Environmental Management Plan (CEMP). Develop Site Waste Management Plan (SWMP)</p>
<p>Scottish Government (Energy Division)</p>	<p>Policy - 15/1999 has been superseded by 3/2011. 3/2011 takes precedence over PAN 58 which is due for revision. EIA to consider Moray Structure Plan 2007 and Moray Local Plan 2008. Moray Local Development Plan Mains Issues Report due for consultation in Jan 2012 and will be a material consideration. ES to contain policy section. Include NPF and SPP. Archaeology - Recent guidance PAN 2/2012 should be applied.</p>
<p>Scottish Fisherman's Federation</p>	<p>No response to scoping</p>
<p>Scottish Hydro Electric Transmission Ltd (SHETL)</p>	<p>No response to scoping</p>
<p>Scottish Natural Heritage (SNH)</p>	<p>Design Clarification of route options being considered and info on collaboration with SHETL and MORL</p> <p>General Query Rochdale envelope approach for cable route.</p> <p>Confirm details on: Type of cable AC/DC; Rate of cable laying; Method of cable laying; Footprint of area affected; Method of cable protection; Footprint of area effected by cable protection; Duration of cable laying; Direction of laying; No. and type of vessels; Route of vessels to works; Estimation of EMF; Estimation of noise emission; Lifespan of cable in this location.</p> <p>Hydrodynamic/ Coastal</p>

Consultee	Response Summary
SNH	<p>Clarify if the cable works will be considered in the BOWL/MORL study "Proposed Methodology for Coastal Processes EIA for the Beatrice and Moray Firth Offshore Wind Farm Developments". Strongly recommend direct and indirect and cumulative effects are considered in this study. Stress importance of considering Wave Base in the cable route selection</p> <p>Importance of protection of the geological SSSI's in designing the landfall option. Suggest qualified coastal geomorphologist.</p> <p>Confirm SHETL, MORL and BOWL are coordinating re the SSSI in particular with reference to cumulative effects at Spey Bay.</p> <p>Confirm cable laying is scoped out of HRA required for habitats in Moray Firth, Dornoch Firth and Culbin Bar SAC.</p> <p>Benthic Ecology See response dated 6th June 2011. During survey checks should be made for Priority Marine Features plus Annex I's. SNH have drawn up a list of Priority Features in STW's.</p> <p>ES to present info on biotypes on chosen route and liaise with MORL and SHETL re cumulatives. Any areas where there is disagreement in the interpreting of data should be highlighted and discussed with SNH and JNCC.</p> <p>Details of impacts to be considered (agree with scoping report): Habitat Loss; Smothering effects/suspended sediment; EMF effects.</p> <p>Fish and Shellfish Response dated 26 May 2011 qualifying fish interests of the relevant SAC's should be considered in combination with MORL. This UPDATES the former scoping response specific to BOWL. The River Naver, River Sorgie and River Dee do not need to be considered re the offshore cable route. Previous advice on HRA remains correct. SAC species to consider are Atlantic salmon and sea lamprey plus pearl mussels. Other species need to be covered in desk based assessment include sea trout, European eel and other proposed PMF's. Refer to advice on wind farm dated 14th May 2011. Effects to be considered include: Smothering; Construction Noise; EMF.</p> <p>Marine Mammals Reference to "common porpoise" should be removed from assessment of cable works. See advice dated 14th May 2011 where SAC interests are identified for consideration in the HRA including bottlenose dolphins in the Moray Firth SAC and common seals Dornoch Firth SAC. Potential impacts to be assessed include: Construction noise; Ducted propellers; Indirect effects.</p> <p>Ornithology Desk based appraisal only. Should not be scoped out, recommend they are included under EIA and HRA. Qualitative appraisal would be helpful once the nature of the cabling works is known. Foreshore counts may be necessary.</p> <p>LVIA - scoped out</p>
Scottish Wildlife Trust	No response to scoping

Consultee	Response Summary
Sea Mammal Research Unit	No response to scoping
Talisman Energy (UK) Ltd	No response to scoping
The Crown Estate	No response to scoping
The University of Aberdeen - Lighthouse Field Station	No response to scoping
Transport Scotland	No response to scoping
Visit Scotland	No response to scoping
Whale and Dolphin Conservation Society Scotland	No response to scoping
Marine Scotland	<p>Planning/Consent Onshore works should be through TCPA. Lists applicable planning documents.</p> <p>General Reference to SNH s/s guidance.</p> <p>ES should be sent direct to consultees a list of whom will be provided by MS-LOT. MS-LOT require 8 hard copies.</p> <p>Site figure compatible with SDME.</p> <p>ES checklist is provided. Includes baseline assessment data; air emissions and waste.</p> <p>Socio-economic Application should include potential jobs, economic benefit from procurement, construction, operation and decommissioning.</p> <p>Archaeology Stresses policy on setting of scheduled monuments and listed buildings. Reference sources include Nat Monument Record and Historic Scotland's Spatial Warehouse.</p> <p>Navigation Possible impacts are more extensive than suggested in the Scoping Report.</p> <p>Ecology Lists legislation and guidance. Specific reference to Scottish Governments Interim guidance specifically the 3 tests set out</p> <p>Hydrology Consult directly with SEPA. Refers to best practice guidance docs and specific concerns that should be taken into account for contractors during construction.</p> <p>Transport Need to include a transport assessment including route study, stress points etc</p>

ANNEX 5A

Table A5: Summary of Cumulative Impact Assessment Discussion Document Consultation

Consultee	Response Summary
Aberdeenshire Council	Cultural Heritage: The proposed study area for cultural heritage of 30km and buffer zone of 1km is acceptable.
Banff Harbour Office	No response to Scoping
Bond Offshore Helicopters	No response to Scoping
Bristow Helicopters	No response to Scoping
Buckie Harbour Office	No response to Scoping
Caithness Petroleum	No response to Scoping
Chamber of Shipping	Shipping and Navigation: Satisfied that the study area, data sources and assessment methodology are adequate.
CHC Scotia	No response to Scoping
Civil Aviation Authority	Has Wick Airport been assessed and scoped out or will it be included in the assessment? Should include an assessment of the impact on the advisory route W4D. Unclear why a feasibility and options study will be looking at a Transponder mandatory Zone (TMZ) as the primary means of mitigation.
Cromarty Firth Port Authority	No response to Scoping
Cruising Association	Shipping and Navigation: The Cruising Association and local yacht clubs should be consulted on any survey results.
Defence Estates	No comments at this stage.
Fishery Industry Representatives	No comments at this stage. Wish to leave the Fishing Federation to respond on their behalf
Fisheries Association Limited	No response to Scoping
Fraserburgh Harbour	No response to Scoping
Highland Council	Marine Mammals: Not inclined to agree that long term avoidance can be scoped out at this stage. Marine Mammals: Include the WDCS as consultees. Landscape and visual: The inner Firths should be included in the cumulative impact assessment. The Council's Visualisation Standards for photography should be used. The Council is developing a digital viewer and the developers are encouraged to use it. Photomontages are required Commercial Fisheries and natural Fish: More detail regarding how developers will

Consultee	Response Summary
	deal with the impacts on the Smith Bank fishing and spawning ground would be beneficial. The Moray Firth Inshore Fisheries Group should be consulted. Ornithology: Further details on the impact on flight paths of birds to the East Caithness Cliffs SPA would be beneficial.
Highland Council Archaeology Service	Agree with study area proposed and methods.
Historic Scotland	Content with proposed study area and methodology.
Inshore Fisheries Group	Responses to wind farm scoping reports provide some recommendations re cumulative impact assessment
Inverness Harbour Trust	No response to Scoping
Ithaca Energy	No response to Scoping
Joint Nature Conservation Committee (JNCC)	SNH/JNCC Joint Response to CIADD Document summarised in Table A6
MacDuff Harbour Office	No response to Scoping
Marine Management Organisation	No response to Scoping
Marine Scotland	No response to Scoping
Maritime Coastguard Agency (MCA)	The shipping and navigation study should include radar and manual observations in addition to AIS data to ensure vessels of less than 300gt are captured. Radar effects of offshore wind farms on ship's radars are an important issue and will be subject to further discussion within the radar sub group of NOREL. The radar effects will need to be assessed on a site specific basis taking into consideration previous reports. Radar effects of offshore wind farms on ship's radars are an important issue and will be subject to further discussion within the radar sub group of NOREL. The radar effects will need to be assessed on a site specific basis taking into consideration previous reports.
Moray Council	No response to Scoping
Moray Firth Sea Trout Project	Require further research to determine if and when sea trout migrate to the Smith Bank and the development area
National Air Traffic Services (NATS)	NATS has no comments on the document and are satisfied that the NATS impacts has been understood
Northern Lighthouse Board	Would welcome and encourage engagement with Oil and Gas UK.
Oil and Gas UK	No response to Scoping
Orkney Council	No comments on CIA assessment

Consultee	Response Summary
PA Resources	No comments on CIA assessment
Peterhead Port Authority	No comment on CIA assessment.
Royal Commission on the Ancient & Historical Monuments of Scotland	No response to Scoping
Royal Society for the Protection of Birds (Scotland)	<p>Ornithology, Fish and Shellfish Ecology: Consider that pelagic marine invertebrates should also be included as they form a vital part of the marine environment.</p> <p>Ornithology, Coastal Processes, Marine Mammals, Natural Fish, Benthic Ecology: The EIA process should take into account any potential marine SPAs or offshore SACs and any future Marine Protected Areas.</p> <p>Ornithology: Recommended that any projects involving major changes in land use should be considered for inclusion as these could affect feeding grounds of migratory birds.</p> <p>Ornithology: The Forth Array project should be retained in the assessment.</p> <p>Ornithology: The displacement of foraging seabirds will need further consideration as relevant methodologies are not adequately covered by the COWRIE guidance.</p> <p>Ornithology: Add 'onshore renewable energy production facilities' to the list of reasonably foreseeable projects.</p> <p>Ornithology: The methodology and assessment must be in a form to allow the Habitats Directive appropriate assessment to be undertaken.</p> <p>Ornithology: Queried the rationale for inclusion/omission of SPAs whose qualifying interests includes wintering geese and swans, which may fly through turbine arrays on migration. Consider Caithness Lochs SPA.</p>
Royal Yachting Association	Under Shipping and Navigation, re-routing of shipping should be expanded to rerouting of shipping and consequent effects on recreational and other vessels.
Scallop Association	No response to Scoping
Scottish Fishermans Federation	No response to Scoping
Scottish Natural Heritage (SNH)	SNH/JNCC Joint Response to CIADD Document summarised in Table A6
Talisman	No response to Scoping
Whale and Dolphin Conservation Society	<p>Military aviation should be included as an activity that could impact marine mammals.</p> <p>Long term avoidance should be included as a potential cumulative impact</p> <p>Interested to be involved in discussions about the study area and how to adequately incorporate other species.</p> <p>All modelling works should be ground truthed with in-field data verification.</p>

Consultee	Response Summary
	Military activities are not identified in Section 4.5 as activities to be included in the study.
Wick Harbour	No comment on CIA assessment.
Wildfowl and Wetlands Trust	No response to Scoping
Wood Group	No response to Scoping

ANNEX 5A

Table A6: SNH/JNCC Response to Cumulative Impact Assessment Discussion Document

Topic Area	Response Summary
Designated Sites	Structure of Environmental Statements (including cumulative impact assessments) is to address the requirements of Habitats Regulations Appraisal (HRA) as well as Environmental Impact Assessment (EIA).
Coastal Processes and Geomorphology	<p>Mistake in translating SACs in Table 4.1.1 into Section 4.2.</p> <p>It is important to consider the occurrence of high magnitude / low frequency events - there may be episodic adjustments of surface sands due to storm events.</p> <p>In Table 4.2.1, any changes in wave energy and sediment transport pathways should be considered together with regard to coastal erosion / accretion patterns.</p>
Benthic Ecology	<p>We welcome the intended liaison between consultancies with regard to benthic ecology (Section 4.3.1, page 27). This will be particularly important with regard to data-sharing and interpreting data in order to classify biotopes (Section 4.3.7, page 32). We therefore think that this liaison should be formalised with regard to biotope classification, so that it is agreed and recorded consistently across the two wind farm sites, and that any locations where there may be disagreement or differing interpretations of data are highlighted for further discussion and/or consultation with ourselves for advice.</p> <p>In respect of Table 2.6.1 (pages 10 & 11) we recommend that military activities are also considered with regard to potential cumulative effects on benthic ecology.</p>
Fish and Shellfish Ecology	<p>Specify each of the SAC interests to be included in the CIA, including sea lamprey and river lamprey (as discussed in Section 4.4.4, page 38).</p> <p>There have been some errors in translating the information in Section 4.1 across into Section 4.4: the text in Section 4.4.3 is confusing, Table 4.4.1 does not include all six relevant SACs.</p> <p>Also in Table 4.4.4, the potential sources of impacts for Atlantic salmon and sea trout include several factors that aren't included for the 'other' migratory species. For example, 'Physical presence of turbines' is deemed a potential source of impact for salmon and sea trout, but not for the 'other' migratory species. It's not clear why this distinction has been applied.</p> <p>We advise that CIA for fish should consider whether the wind farms may simply cause aggregation of particular species, or whether they might provide suitable conditions for enhanced reproductive opportunities.</p> <p>If fishing is to be excluded from these wind farm sites, it will be important for CIA to also consider the possible positive role of these areas in supporting enhanced biomass, protecting juveniles on their nursery grounds and/or safeguarding adults during spawning periods. If there is significant displacement of fishing activity, then cumulative assessments should also consider the stock and benthic impacts of this displacement in concentrating fishing effort to areas beyond the development site. It should be established (perhaps through interview with fishers) where fishing effort is likely to be displaced to.</p> <p>In Table 4.4.4 (page 43) we recommend referring to the draft PMF list for other named fish species of conservation concern it is relevant to consider (such as cod and juvenile whiting).</p>

Topic Area	Response Summary
	<p>In respect of shellfish, we note that some species have migratory behaviours, linked to particular phases of life-history or seasons. While EMF is unlikely to be a major issue for these migratory shellfish, they may not be immune to effect, and concerns have been raised in this regard for lobster, particularly within the Moray fishing industry.</p> <p>We advise that elasmobranchs may also be affected by loss of/ damage to habitat; displacement; disturbance (including disturbance due to noise); and any changes in prey distribution.</p>
Marine Mammals	<p>In respect of seal licensing, we think it would be helpful if the telemetry study were to be extended to include any available records for grey seals.</p> <p>We advise that it will be important to estimate the density of key marine mammal species not only at each wind farm site (i.e. within the site boundaries of Beatrice and the Round 3 zone) but across the entire area of predicted effect from each wind farm individually and cumulatively (to be determined on a species by species basis).</p> <p>We recommend that underwater noise generated from dredging activities/sea disposal is considered. Also, this table should include the seismic survey work associated with the oil and gas licensing blocks in the Moray Firth (and not just the placement of any new infrastructure). Under military activities we would specifically highlight the MOD Joint Warrior exercises for consideration.</p> <p>MFOWDG suggest that 'long term avoidance' of the wind farm sites by marine mammals is scoped out as a potential effect (Section 4.5.6, page 48). We think it is too early to do so and that this issue should be considered in CIA.</p> <p>It is still necessary to consider the noise that may be emitted from the full range of foundation types likely to be used at wind farm sites.</p>
Ornithology	<p>We advise that the birds 'long-list' needs to be comprehensive at this initial stage in the process: it should include all relevant SPA seabirds within foraging range of the wind farm sites, as well as passage/migratory SPA interests.</p> <p>We have serious concerns about Table 4.6.2 on pages 61 & 62. It presents a broad overview of bird sensitivities but it is unclear how it has been derived from the guidance provided in King et. al. (2009). We are due to meet with MFOWDG on Friday 10 June and would welcome further discussion of this.</p> <p>We consider that Section 4.6.8 (page 60) does not go into enough detail with regard to the HRA process, and it would be helpful to explicitly state the conservation objectives which apply to SPA bird interests.</p> <p>As well as the RSPB, we recommend that the Wildfowl and Wetlands Trust (WWT) is consulted, particularly with reference to passage waterfowl and shorebirds.</p> <p>We suggest that there may be value in sharing data in order to produce more robust detection functions for use in Distance modelling. This may be particularly beneficial for species with lower densities, where sharing a common detection function may greatly reduce the error associated with density estimates from Distance software. This will depend partly on how great the differences in the observer height might be between the two surveys. We suggest that this option remains in discussion and that further expert advice is sought.</p> <p>We advise that the trends and status of each population potentially impacted will</p>

Topic Area	Response Summary
	<p data-bbox="517 277 762 302">need to be considered.</p> <p data-bbox="517 338 1378 454">Some consideration should also be given to the fact that effects may act in combination both within and between developments - so that, for example, a bird species may be subject to collision mortality and indirect impacts in combination, or to displacement/ disturbance and barrier effects in combination.</p>