

[Redacted]  
Marine Scotland - Marine Planning and Policy  
The Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Our ref 670525/001/CP  
Telephone 0141 341 3240  
E-mail [Redacted]

14 December 2018

Dear [Redacted]

**Newton Marina, Stornoway  
MS-LOT Supplementary Information**

As agreed with MSLOT, EnviroCentre have incorporated all amendments as set out in the email provided by MSLOT on 4 December 2018. This letter consolidates the information submitted as part of the Environmental Impact Assessment (EIA) for Newton Marina, prior to the commencement of the consultation review.

MS comments are set out in black italics, with ensuing applicant statement in blue print. This letter should be read alongside the previously-submitted hard copies of the EIAR.

**Construction and Dredge Licence Applications**

- (i) ***Coordinates** – sections 5(f) and 6(d), respectively: Having plotted the coordinates for both applications, they do not appear to follow the shape of the development submitted as part of Drawing No. 2002 'EIA Figure 2.1: Site Layout Plan'. I have marked some indicative locations in green oval shapes in the attached drawing to direct you to what coordinates we require instead as they need to be below/on MHWS and follow the shape of your proposal.*

Only the coordinates of the furthest extents of the marine licence consultation boundary were requested and provided for on the original MS application. The number of points have since increased to include the coordinates of *all vertices* on the boundary (totalling 17 points either within or below MHWS), outlining the definitive shape of the proposed development as required by MSLOT.

Please see Appendix A for the revised list of co-ordinates which are also included as part of the Marine Licence documentation.

- (ii) **National Marine Plan considerations** – sections 10 and 13, respectively:  
*We require further justification as to how the proposal follows each of the policies referenced.*

Principles of sustainable development are embedded within the NMP 2015, where the use of the marine environment for sustainable economic growth is recognised and promoted (Gen 1), specifically in remote areas susceptible to rural depopulation and stagnant economies (Gen 2). In this case, use of the marine environment will potentially stimulate economic activity, which is likely to have many indirect social benefits in the form of local investment in services and employment generation (Gen 3/Chapter 10: Other Issues) whilst assuring economic and social opportunity for future generations (Chapter 10: Other Issues). Cumulative impacts on the ecosystems of the marine plan area have been assessed accordingly, with specific consideration given to the Deep Water Port development (Gen 21).

The proposed development has been subject to full Landscape and Visual and Cultural Heritage Impact Assessments (as per Chapters 4 and 5 of the EIAR) and it was concluded that the proposed development will still allow for appreciation of the cultural significance and character of the Stornoway Conservation Area and heritage assets (GEN 7). A Noise Impact Assessment was also undertaken for the proposed development (as per the EIAR). The worst-case daytime and evening significance of effects from construction activities at Newton Marina (including cumulative impacts with Deep Water Port) is of a Slight significance which, although undesirable, represents an exceedance above threshold limits which will be barely perceptible. These receptors are located along Newton Street. At night, the worst-case impacts (including cumulative impacts) are of Moderate significance at two receptors along Newton Street as a result of proposed dredging operations. This Moderate magnitude will only be applicable for a short duration of two months (GEN 13/Chapter 7: Noise).

The table below summarises where the National Marine Plan was considered (extensively) within the body of the EIA submission.

**Table 1: Summary of Significance of Effects (as per Newton Marina EIAR)**

	<b>Construction Phase Impacts</b> (Residual post-mitigation)	<b>Operational Phase Impacts</b> (Residual post-mitigation)
<b>Chapter 4: Landscape and Visual (GEN 7):</b>	<b>Significant</b> (localised at Newton St, Offshore Harbour & Ferry Terminal)	<b>Significant</b> (localised moderate-major at Newton St, Offshore Harbour & Ferry Terminal)
	<b>Not Significant</b> (Coastal Character & Landscape)	<b>Not Significant</b> (Coastal Character & Landscape)
<b>Cumulative (GEN 21):</b>		<b>Significant</b> (localised moderate-major at Newton St & Ferry Terminal)

	<b>Construction Phase Impacts</b> (Residual post-mitigation)	<b>Operational Phase Impacts</b> (Residual post-mitigation)
<b>Chapter 5: Marine Ecology (7.133)</b>	<b>Not Significant</b> (negligible)	<b>Not Significant</b> (minor)
<b>Chapter 6: Cultural Heritage (7.126-7.127)</b>	<b>Not Significant</b> (negligible)	<b>Not Significant</b> (negligible)
<b>Chapter 7: Noise (GEN13)</b>		
Daytime	<b>Not Significant</b> (slight)	<b>Not Significant</b>
Evening	<b>Not Significant</b> (slight)	<b>Not Significant</b>
Night-time	<b>Significant</b> (moderate)	<b>Not Significant</b>
<b>Cumulative: (GEN 13/21)</b>		
Daytime	<b>Not Significant</b> (slight, neutral)	<b>Not Significant</b>
Evening	<b>Not Significant</b> (slight, neutral)	<b>Not Significant</b>
Night-time	<b>N/A</b> (no cumulative night-time)	<b>Not Significant</b>
<b>Chapter 8: Water (7.133)</b>	<b>Not Significant</b> (negligible, minor)	<b>Not Significant</b> (negligible, minor)
<b>Chapter 9: Traffic and Transport (7.133)</b>	<b>Not Significant</b> (all minor)	<b>Not Significant</b> (negligible, minor)

Assessments established that due to the iterative design process and implementation of suitable mitigation measures, potentially significant adverse effects resulting from the proposed development have been minimised. The associated EIA identified only a small number of potentially significant effects associated with the Landscape and Visual (LVIA) and Noise assessments of the site. It is concluded that through the implementation of prescribed mitigation measures during the construction phase, and in light of the new recreational function proposed by the marina; that these effects are either very localised (i.e. for landscape and visual); or short-term (i.e. for noise) and to be expected with developments of this nature.

- (iii) **Licence duration and dates** – sections 5 (c)(d) and 6(b)(c), respectively:  
*We understand that the specific dates might not be currently available, however we need to have some indicative dates and a duration to base our assessment on. Depending on the seasonality of the works, species may be affected differently and as such consultees must have an indication of your proposed dates in order to provide us with sufficient advice.*

At present, construction dates are anticipated to be approximately April/May 2019 until March/April 2020. It should be noted that duration of construction is frequently referred to within the EIA,

explicitly under *Chapter 2: Proposed Development, Construction Phasing Section 2.4.2 and Table 2.2 on page 17*. Duration is also indirectly assimilated as a parameter to assess magnitude of significance in each case for consecutive chapters, i.e. *LVI, Noise, Marine Ecology, Water, and Transport*.

## EIA Report

- (i) *Section 7.6 of our Scoping Opinion (dated 09 March 2018) refers to the requirement for a Protocol for Archaeological Discoveries to be included in the Schedule of Mitigation (SoM). No reference of your commitment to provide such a protocol has been made within the EIA report and the SoM and we therefore ask for this to be amended.*

Archaeological methodology and procedure (via a Protocol for Archaeological Discoveries) will be included within a site-specific Construction Environmental Management Plan (CEMP), which will be finalised prior to the commencement of construction works as agreed by the appointed contractor. Implementation at post-consent stage is acceptable and sufficient for this requirement, as per Section 7.6.2 of the Scoping Opinion from MSLOT dated 9 March 2018. Sections 6.7.1 and 6.9 within Chapter 6: Cultural Heritage and Chapter 12: Schedule of Mitigation of the EIA Report have been updated to reflect this consideration.

- (ii) *The total area of the proposal is inconsistent e.g. section 2.2.1 refers to '7.97 hectares' whereas section 4.5.3 refers to '7.24 hectares'. Can you please check the submitted documentation and amend any sections referring to the incorrect area measurement?*

The total area of the proposed development is 7.97 ha (as opposed to 7.24ha). The only inconsistent area measurement was noted in *Chapter 4: Landscape and Visual, Section 4.5.3 'Overview of Site and Surrounding Landscape'* – this has now been amended in line with MSLOT review.

- (iii) *The cumulative assessment undertaken seems to lack consideration of the Western Isles cable project. Examples include section 2.4.3 and 5.7.3, whereby it is stated that although there were not sufficient details on the project at the time of writing, 'it is thought that there will be no cumulative impact on Newton Marina from this development', with section 8.6.5.3 stating 'the nature and positioning of the proposed HVDC Link infrastructure outside the waters of Stornoway Harbour embayment is such that it is considered there will be no significant impact on Newton basin, or the wider Stornoway Harbour'. Therefore, we require that you please undertake a cumulative assessment which considers any impacts from undertaking the Newton Marina project within the vicinity of the Western Isles cable project (both temporary and spatially).*

The HVDC is being constructed at Arnish Point, Stornoway. Newton Marina is situated 1.5 km from the onshore landfall of the HVDC interconnector proposal. At the time of assessment, The Applicant/EnviroCentre were not privy to or briefed upon any detail pertaining to the subsea cable apart from landfall location, with this information being available within the public domain. Cumulative assessment cannot be undertaken for a proposal for which no public information was provided at the time of assessment (i.e. in terms of methods and timing of construction).

The EIAR did make provision for the HVDC interconnector project within the component chapters, based on the available information in public circulation at the time of assessment. These provisions are summarised below;

- The interconnector substation was included within the LVIA viewpoint analysis and annotated schematics as part of the predicted industrial baseline at Arnish. It was concluded that there would be no cumulative interaction given, (i) the distance between the proposals and, (ii) the anticipated industrial baseline of Arnish (including the proposed Seaweed Processing Factory and Deep Water Port infrastructure).
- Cumulative impacts of the interconnector upon marine mammals were considered within *TA 5.3 Habitats and Regulations Appraisal, Chapter 3, section 3.3 In-Combination effects*. The effects were not quantifiable at the time of assessment due to the interconnector development being in the preliminary stages of planning. Significance of impacts on marine mammals could not be determined further for these reasons. Potential impacts identified included seabed disturbance; increase in suspended sediment concentrations and deposition; potential contaminant release from sediment; electromagnetic fields, thermal radiation; underwater noise and disturbance from vessel and installation activity.
- Cumulative underwater noise interactions for Temporary and Permanent Threshold Shift zones (TTS/PTS), were found to out-with the proximity of the HVDC landfall and therefore no cumulative interaction was determined (*see Section 3.1, Underwater Noise Technical Appendix 5.4*).
- Cultural Heritage Assessment (*see Chapter 6: Cultural Heritage, Section 6.6.4*) concluded no cumulative effects as no heritage asset will be subject to greater than negligible construction/operational effects.
- Operational terrestrial noise was scoped out of the Noise Impact Assessment, thus indicating that operational substation noise would likewise have been excluded from the scope, had there been obtainable information at the time of assessment. No significant operational effects were found, whilst construction noise was deemed temporary in nature.
- Water Assessment concluded that the nature and positioning of the proposed HVDC Link infrastructure outside the waters of Stornoway Harbour embayment is such that it is considered there will no significant impact on Newton Basin, or the wider Stornoway Harbour (*see Section 8.6.5.3 within Chapter 8: Water Environment*).

(iv) *There appear to be discrepancies in terms of marine mammal-related mitigation. Under section 5.8.2 some of the mitigation proposed during piling activities includes:*

- *Piling to commence prior to darkness and*
- *MMO to be present.*

*However, section 5.8.3 discusses a protocol to be used when impact piling is to commence during hours of darkness/low visibility, which is contradictory to the previous commitment of only commencing piling during the day. The same section states that MMOs are not proposed to be used (will not be effective anyway since visual observations will not be possible).*

*These contradicting commitments are followed through to the technical appendices as well.*

*No MMOs are proposed to be used during dredging and sea disposal operations due to the perceived lower chances of contributing to auditory injury to marine mammals. However, the possibility of physical injury should also be considered.*

*Can you therefore please clarify what mitigation you are proposing to use for each occasion and update the relevant sections within your submission to reflect that.*

For the avoidance of doubt, construction works, including potential piling operations, would potentially be undertaken in periods of darkness.

Amendments to the wording of the piling and MMO protocol have been clarified within Chapter 5: Marine Ecology and Technical Appendix 5.2. Section 5.8.2 of the EIA Report states that visual monitoring will not commence during poor visibility (i.e. darkness or above Sea State 4) as it is difficult to detect marine mammals in conditions that are dark, foggy or above Sea State 4. In the event that visual monitoring is not possible, the protocol outlined in 5.8.3 should therefore be followed.

Risk of physical injury to marine mammals from disturbance/collision from vessel movement has been clarified within Sections 4.3 and 4.4 of Technical Appendix 5.2 and in Section 5.8.4 of the EIA Report. The Schedule of Mitigation within the EIA Report also reflects these changes. As there is no requirement for a MMO during maintenance dredging, contractors will be made aware of the potential presence of basking sharks and broadly work to vessel movement mitigation (see Appendix D within Technical Appendix 5.2).

- (v) *Section 7.9 of our Scoping Opinion refers to the requirement that the applicant has 'on-going discussions with the Royal Yachting Association ("RYA") to agree their requirements to mitigate any potential impact'.*  
*The only reference we could find to the RYA was section 10.9.2 of the EIA report, which states that 'For recreational users, i.e. small leisure craft, published almanacs identify cruising routes, harbour details and safety measures to be observed. All users should be familiar with data available within Admiralty Charts (issues by the United Kingdom Hydrographic Office) including traffic separation schemes, chart datum of depths, coastline, weather – to inform their approaches and avoid collision within the vicinity of the proposed development. All users affiliated with the RYA are thus obliged to be duly informed and comply with these measures'.*  
*We would expect that you make a commitment to liaise with the RYA as per our scoping opinion, which should be useful when consultees review this as part of consultation.*

The Royal Yachting Association (RYA) contributed as participating consultees at the scoping stage of the proposed development and contribution to the scoping opinion were duly considered. These considerations were subsequently incorporated within Chapter 10: Other Issues. The Applicant is committed to further discussions with the RYA, and will implement navigational measures to minimise disruption for recreational craft and other harbour-users in the construction phase. In the long-term, the development will positively impact the RYA, by securing Stornoway's position as an important port of call within the Royal Yachting Association's UK Coastal Atlas of Recreational Boating - appealing to brand new markets in the form of touring leisure craft from Scotland, UK and further afield.

The marina will be a positive long-term development for the RYA. Navigational considerations to minimise disruption for harbour users have been outlined in Section 10.9.

## EIA Technical Appendices

- (i) *Some of the figures in the technical appendices are illegible and we therefore ask that they are replaced with figures of good resolution. These will form part of the consultees' review and therefore have to be legible in electronic format. Examples include appendix D, of chapter 5, of Technical Appendix 5.2 (p. 295) and most figures in Technical Appendix 5.4.*

Underwater Noise model outputs (produced by Irwin Carr Consulting) were compressed for the purpose of the final PDF document. The resolution of these models has now been increased at the request of MSLOT and these are provided within Appendix B as separate PDF documents and an explanation of the figures. There are no changes to the models, only revised resolution.

Uncompressed versions of all graphs and figures are also available within the original word copy of Technical Appendix 5.4 should this be required.

- (ii) *Finally, the pre-dredge sampling guidance quoted in section 5.3 of Technical Appendix 8.1 is not the guidance referenced in the Scoping Opinion as Appendix V.*

The pre-dredge sampling guidance referred to in Section 5.3 of Technical Appendix 8.1 Marine Site Investigation Report was current when the Site Investigations contract was let in August 2017. Version 2 of the guidance ensued shortly after in November 2017. Wallace Stone (Consultant Engineers for the project) sent confirmation of the Newton Marina borehole locations to Lorraine Gray at MS in February 2018, who subsequently confirmed that the number and location of the boreholes was appropriate. Please note that the Action Levels used in the sediment contaminant analysis were taken from Version 2 of the guidance.

We trust that the information provided in this letter is sufficient to clarify the points raised by MSLOT on 4 December 2018, but should you have any queries please do not hesitate to get in contact.

Yours sincerely  
**for EnviroCentre Ltd**

(issued electronically)

[Redacted]  
**Principal Consultant**

Enc:  
Appendix A – Revised Marine Licence Coordinates for Construction and Dredge  
Appendix B – Supplementary Underwater Noise Excerpts

CC: [Redacted] Stornoway Port Authority (SPA)



## APPENDIX A – Revised Marine Licence Coordinates for Construction and Dredge

### Revised Coordinates for Construction Area (Marine Licence);

MSLOT Vertices							
	OID *	Shape *	POINT_X	POINT_Y	DMSLat	DMSLon	ORIG_OID
	1	Point	-6.381657	58.205587	58 12 18.68195660N	006 22 57.91359893W	1
	2	Point	-6.383513	58.204877	58 12 16.12734879N	006 23 04.59545811W	2
	3	Point	-6.383537	58.204405	58 12 14.42830148N	006 23 04.67922798W	3
	4	Point	-6.381764	58.20495	58 12 16.38705734N	006 22 58.29904489W	4
	5	Point	-6.381999	58.20436	58 12 14.26568623N	006 22 59.14627585W	5
	6	Point	-6.381939	58.203941	58 12 12.75785879N	006 22 58.92752323W	6
	7	Point	-6.382399	58.20356	58 12 11.38352049N	006 23 00.58457515W	7
	8	Point	-6.382551	58.203176	58 12 10.00430934N	006 23 01.13193282W	8
	9	Point	-6.379263	58.202677	58 12 08.20722424N	006 22 49.29774643W	9
	10	Point	-6.379311	58.203027	58 12 09.46698455N	006 22 49.46946424W	10
	11	Point	-6.376417	58.203624	58 12 11.61594896N	006 22 39.05161609W	11
	12	Point	-6.376794	58.203999	58 12 12.96413363N	006 22 40.40845898W	12
	13	Point	-6.378027	58.203825	58 12 12.33796226N	006 22 44.84911107W	13
	14	Point	-6.378187	58.204238	58 12 13.82494334N	006 22 45.42394885W	14
	15	Point	-6.37487	58.204952	58 12 16.39545363N	006 22 33.48460001W	15
	16	Point	-6.375717	58.203612	58 12 11.57276306N	006 22 36.53453141W	16
	17	Point	-6.378224	58.204005	58 12 12.98628637N	006 22 45.55640810W	17

### Revised Coordinates for Dredge and Disposal Area (Marine Licence);

Dredge_coords_ConvertCoordin							
	OID *	Shape *	POINT_X	POINT_Y	DMSLat	DMSLon	ORIG_OID
	1	Point	-6.384044	58.20521	58 12 18.75466080N	006 23 02.55795360W	1
	2	Point	-6.383533	58.204964	58 12 17.86873680N	006 23 00.71965680W	2
	3	Point	-6.383009	58.205149	58 12 18.53603280N	006 22 58.83102480W	3
	4	Point	-6.382269	58.20523	58 12 18.82831680N	006 22 56.16994080W	4
	5	Point	-6.381391	58.205113	58 12 18.40775760N	006 22 53.00595120W	5
	6	Point	-6.381162	58.204974	58 12 17.90669880N	006 22 52.18340880W	6
	7	Point	-6.381408	58.204398	58 12 15.83195400N	006 22 53.06854440W	7
	8	Point	-6.379357	58.203657	58 12 13.16523240N	006 22 45.68579040W	8
	9	Point	-6.378548	58.203796	58 12 13.66683480N	006 22 42.77397720W	9
	10	Point	-6.378671	58.204015	58 12 14.45474160N	006 22 43.21688880W	10
	11	Point	-6.378514	58.204137	58 12 14.89407840N	006 22 42.64865400W	11
	12	Point	-6.37862	58.204296	58 12 15.46506000N	006 22 43.03024680W	12
	13	Point	-6.381109	58.205397	58 12 19.42830720N	006 22 51.99074760W	13
	14	Point	-6.382193	58.205547	58 12 19.96941600N	006 22 55.89579720W	14
	15	Point	-6.383277	58.205454	58 12 19.63450800N	006 22 59.79649440W	15



## **APPENDIX B –Supplementary Underwater Noise Excerpts**

Group names:

"Fish"        Here covers Salmon, Trout, Cod and Basking Shark  
P-        Palagic fish who's swimbladder don't assist in hearing (Salmon, Trout, Basking shark)  
P+        Pelagic fish who's swimbladder DO assist in hearing (Herring, Shad)  
D-        Demersal fish who's swimbladder don't assist in hearing (Turbot, Plaice)  
D+        Demersal fish who's swimbladder DO assist in hearing (Cod, haddock)

The following 5 categories are from NOAA/NMFS Guidance on noise for marine mammals 2018

LF        Baleen whales (incl. Minke)  
MF        Most dolphins (incl. Risso's, Common, Bottlenose and Pilot Whale)  
HF        A few dolphins and all porpoises (Incl. Harbour porpoise)  
PW        True seals (incl. Harbour seal and Grey seal)  
OW        In the UK, this group is Otters and mink (also includes polar bear, walrus, eared seals)

Suffixes:

"imp" The assessed noise was impulsive - here this was impact pile driving  
"SEL" Sound Exposure Level - may receive a further suffix to indicate time period or event count

E.g file: "fish imp SEL 6000.png" is the risk map for fish based on an SEL threshold and 6000 strikes




Example:

File


"Dredge Newton, Drilling DWP, SEL 24 PW"

Dredging noise at Newton assessed in conjunction with the piling at the DWP. The assessment parameter was sound exposure level over a 24 hour period for the hearing group "PW"

## Areas

-  Piling area
-  Dredging area
-  500 m buffer




## Risk zones

-  TTS
-  PTS







## Areas

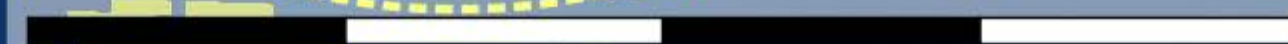
-  Piling area
-  Dredging area
-  500 m buffer

## Risk zones

-  TTS
-  PTS






0 250 500 750 1000 m





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## Areas

-  Piling area
-  Dredging area
-  500 m buffer




## Risk zones

-  TTS
-  PTS







## Areas

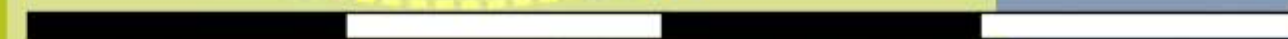
-  Piling area
-  Dredging area
-  500 m buffer

## Risk zones

-  TTS
-  PTS






0 250 500 750 1000 m







## Areas

-  Piling area
-  Dredging area
-  500 m buffer




## Risk zones

-  TTS
-  PTS






## Areas

-  Piling area
-  Dredging area
-  500 m buffer




## Risk zones

-  TTS
-  PTS







## Areas

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-  Dredging area
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## Risk zones

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





## Areas

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-  Dredging area
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-  PTS







## Areas

-  Piling area
-  Dredging area
-  500 m buffer




## Risk zones

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-  PTS







## Areas

-  Piling area
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


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





## Areas

-  Piling area
-  500 m buffer
-  Dredging area




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





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


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-  PTS







## Areas

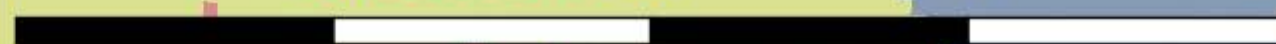
-  Piling area
-  500 m buffer
-  Dredging area

## Risk zones

-  TTS
-  PTS






0 250 500 750 1000 m







## Areas

-  Piling area
-  500 m buffer
-  Dredging area




## Risk zones

-  TTS
-  PTS







## Areas

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-  500 m buffer
-  Dredging area




## Risk zones

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-  PTS







## Areas

-  Piling area
-  500 m buffer
-  Dredging area




## Risk zones

-  TTS
-  PTS







## Areas

-  Piling area
-  500 m buffer
-  Dredging area

## Risk zones

-  TTS
-  PTS






0 250 500 750 1000 m







## Areas

-  Piling area
-  500 m buffer
-  Dredging area

## Risk zones


-  TTS
-  PTS





# Fish

## Areas

 500 m buffer

## Risk zones

 TTS

 PTS





# Fish

## Areas

500 m buffer

## Risk zones

TTS


PTS






# Fish

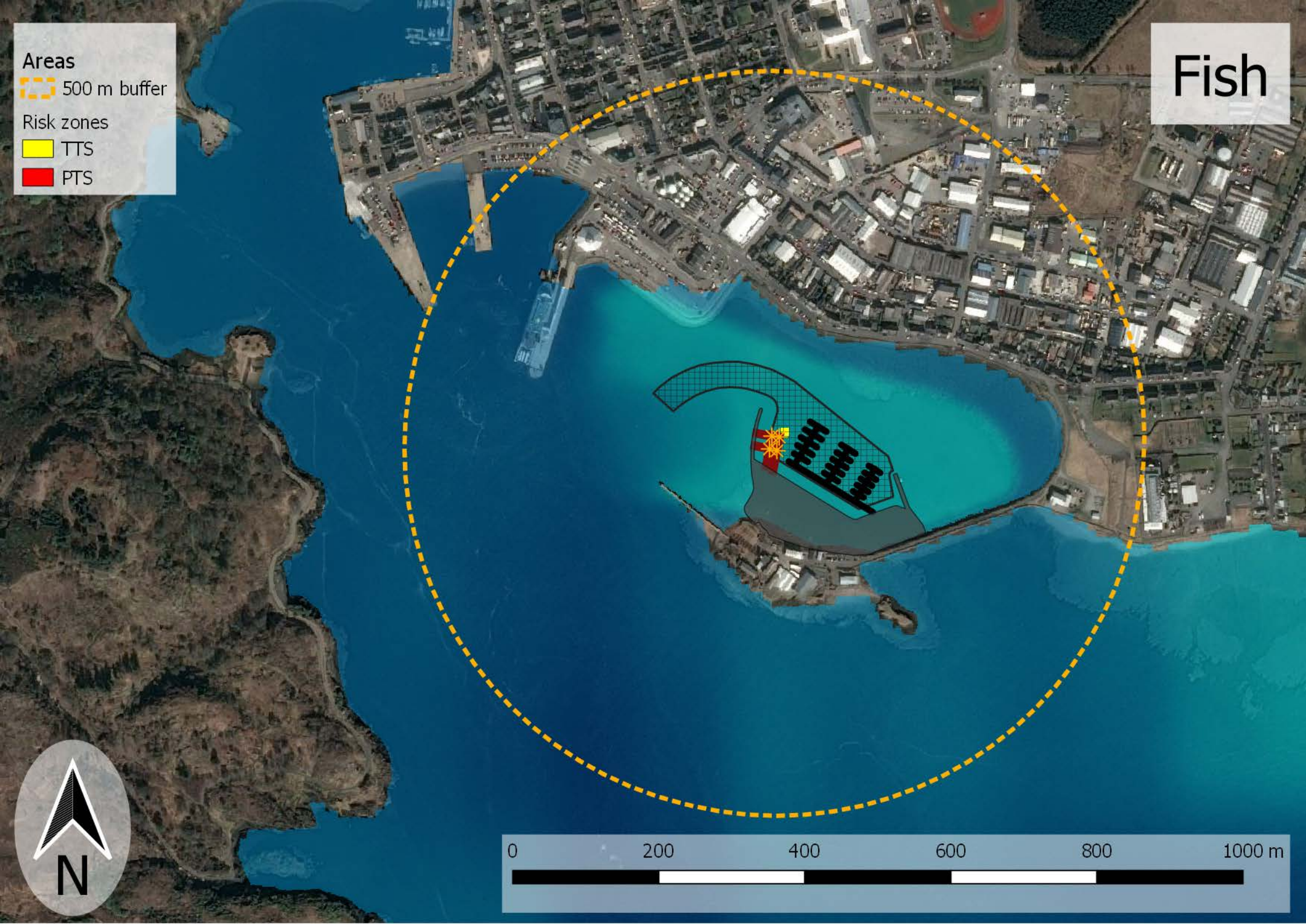
## Areas

 500 m buffer

## Risk zones

 TTS

 PTS





**Areas**

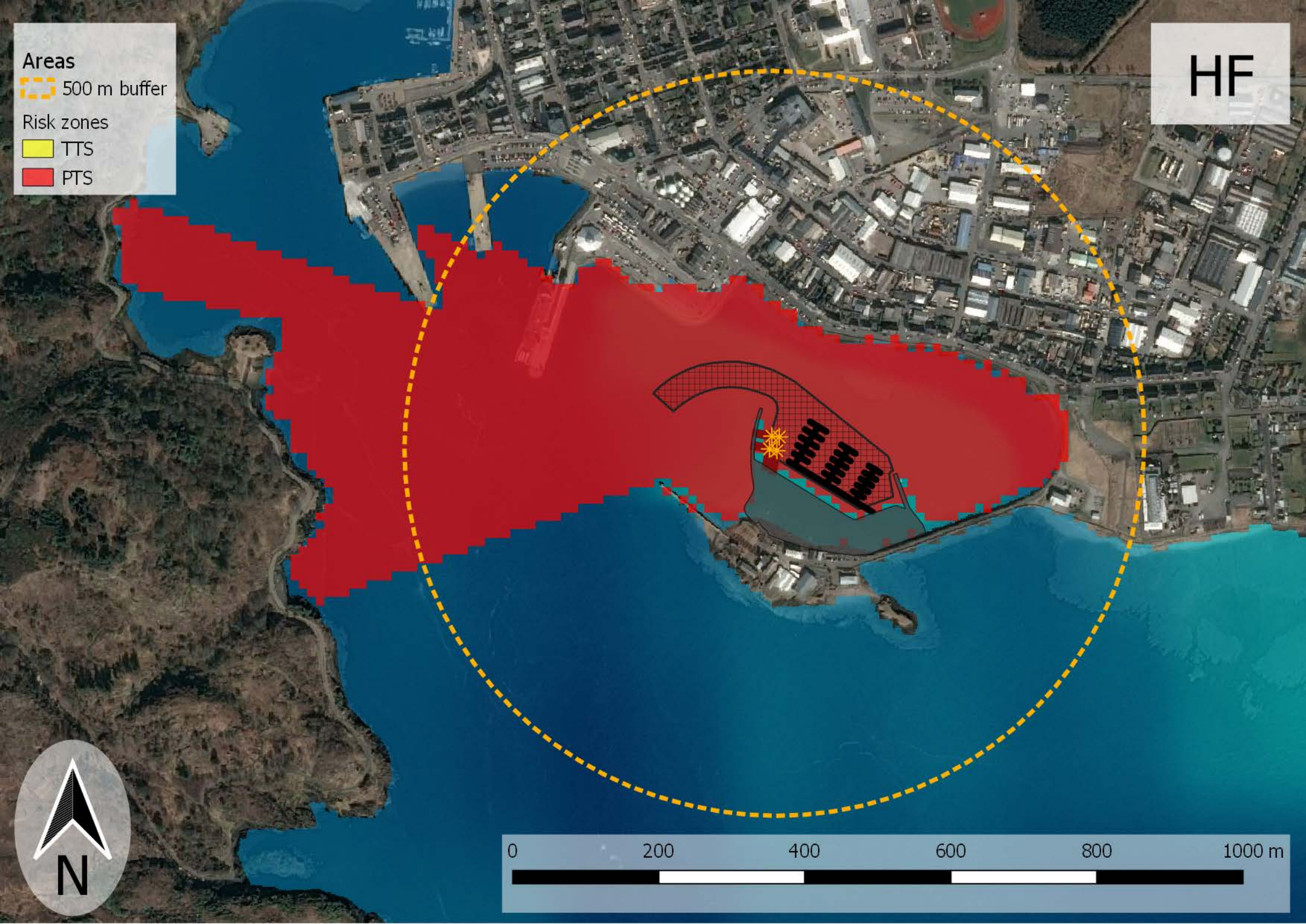
 500 m buffer

**Risk zones**

 TTS

 PTS

HF





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

HF





**Areas**

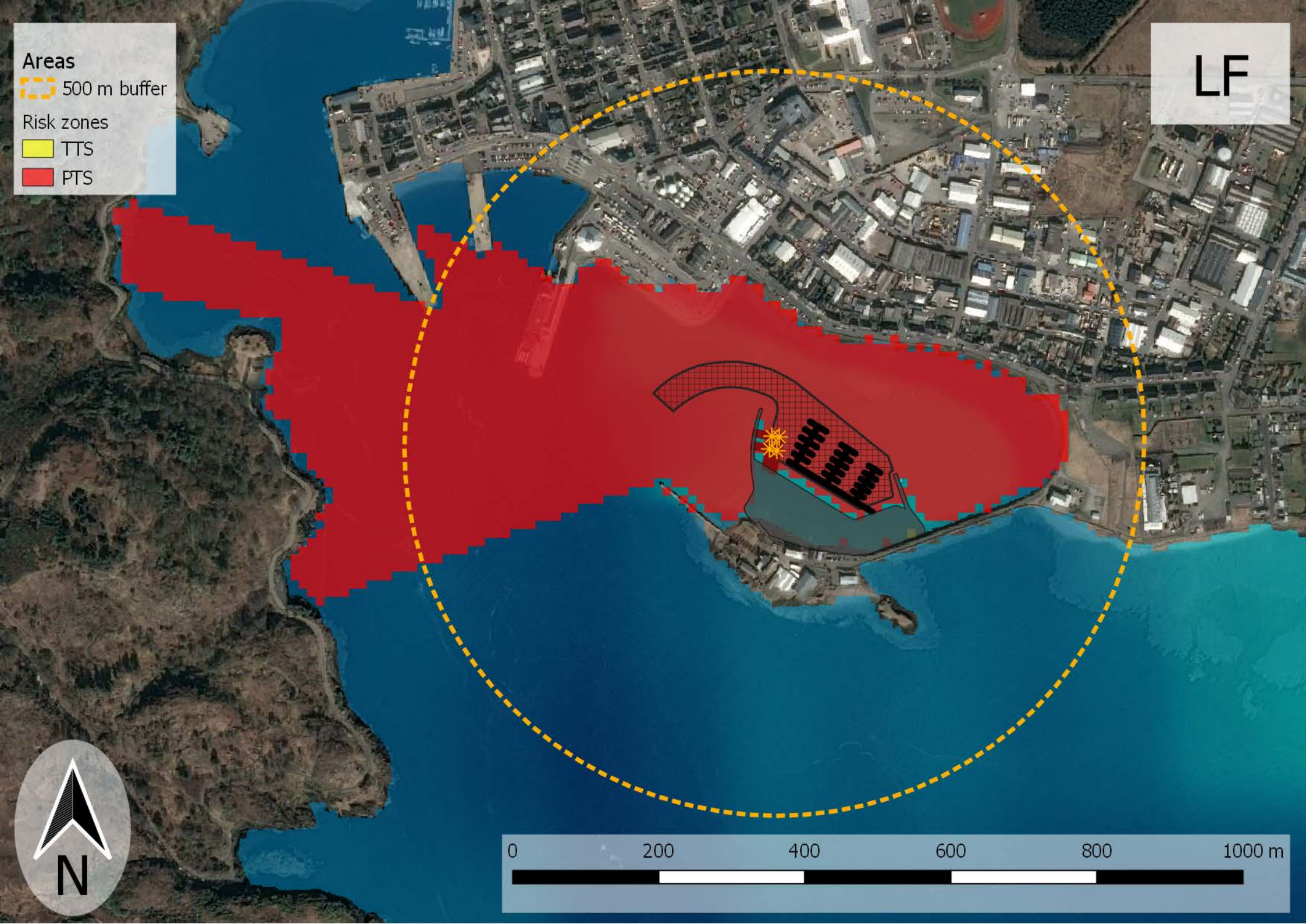
 500 m buffer

**Risk zones**

 TTS

 PTS

LF





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

LF





**Areas**

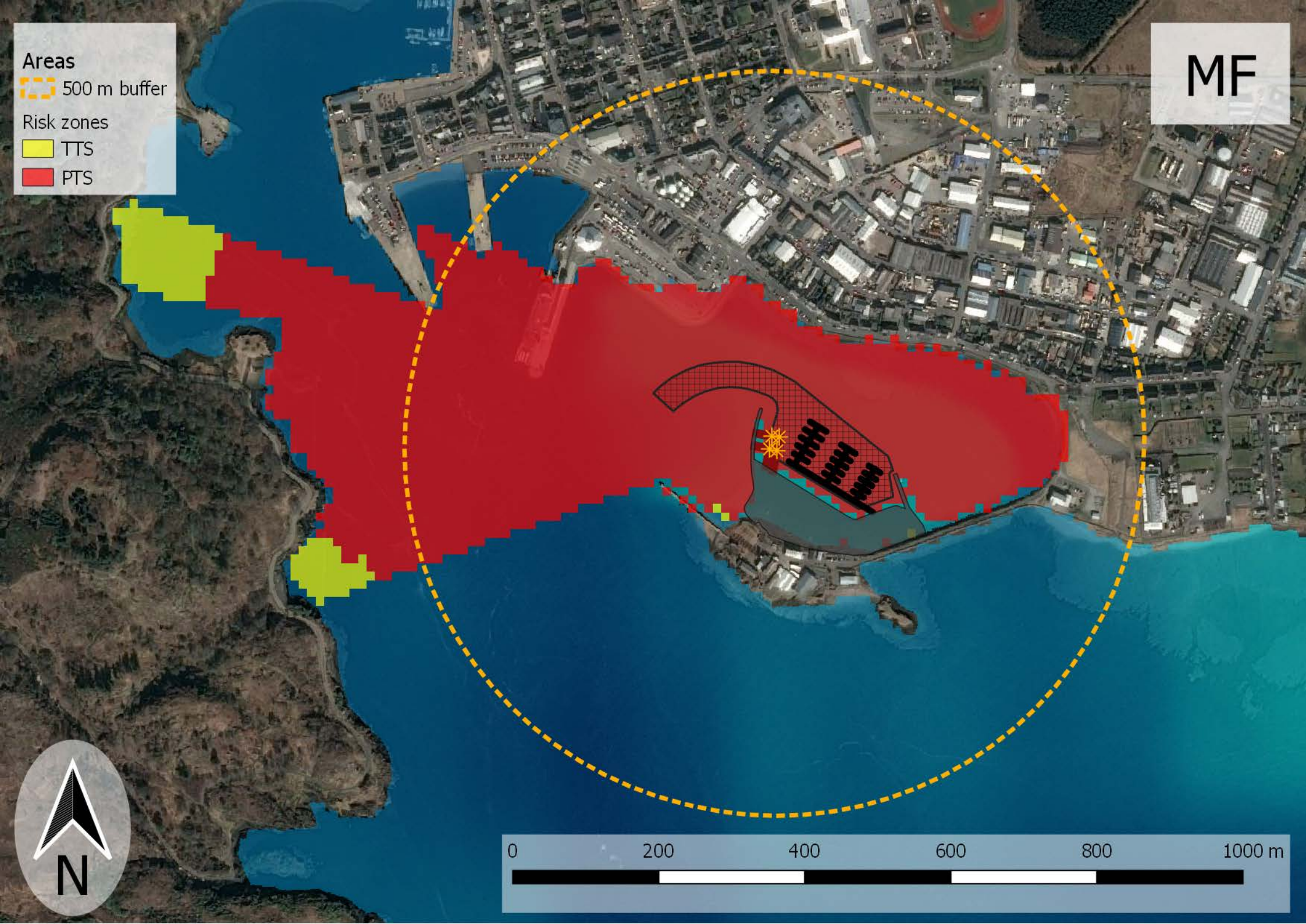
 500 m buffer

**Risk zones**

 TTS

 PTS

MF





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

MF





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

OW





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

OW





**Areas**

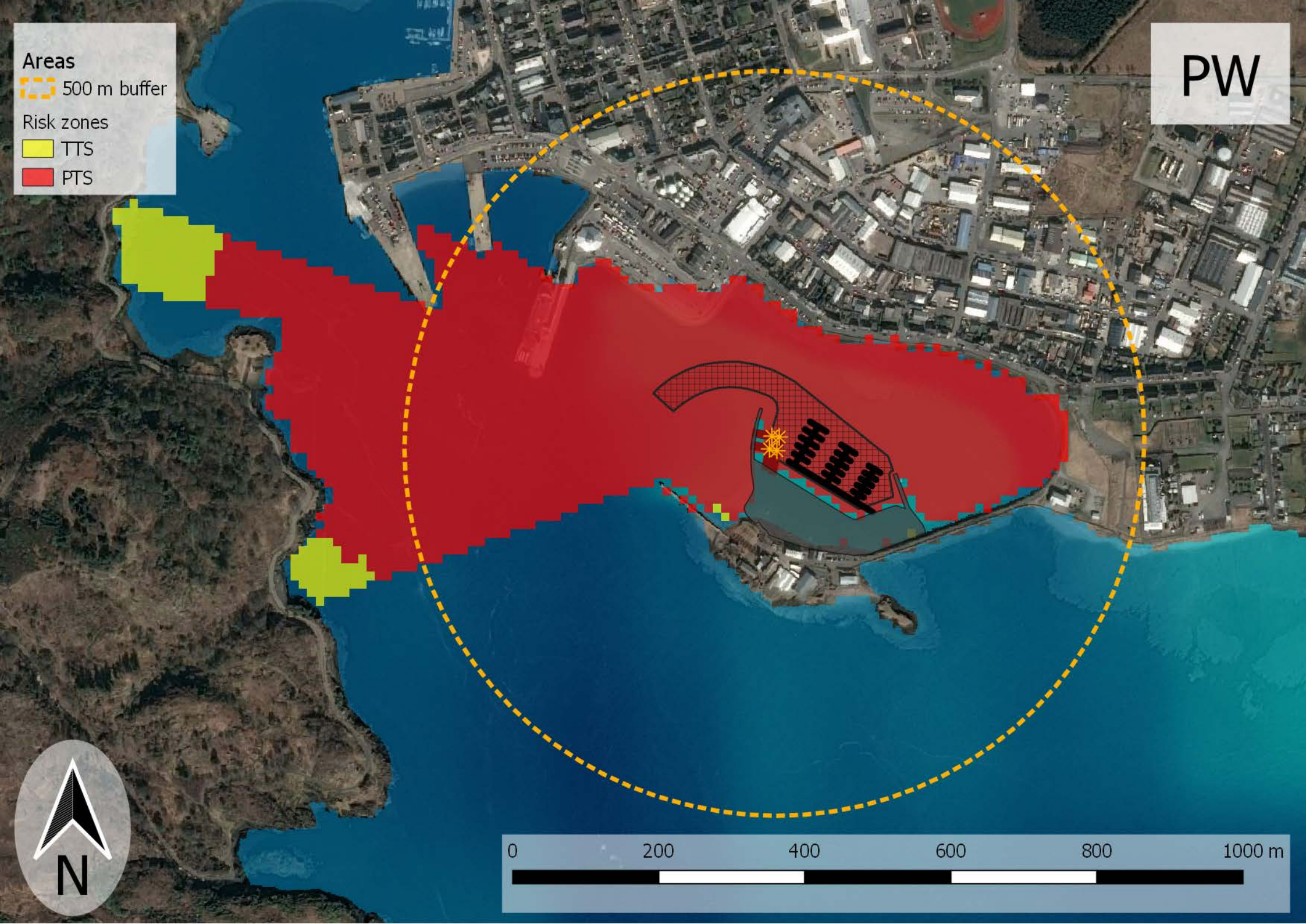
 500 m buffer

**Risk zones**

 TTS

 PTS

PW





**Areas**

 500 m buffer

**Risk zones**

 TTS

 PTS

PW

