

NatureScot

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Our ref: CNS / REN / OSWF / Inch
Cape – Post-application

By email only: md.marinerenewables@gov.scot

Dear Iain,

NATURESCOT ADVICE ON THE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) FOR INCH CAPE OFFSHORE WIND FARM

Thank you for consulting NatureScot on the proposed Construction Environmental Management Plan (CEMP) for Inch Cape Offshore Wind Farm. We have reviewed the document dated April 2024 (IC02-INT-EC-OFC-007-INC-PLA-001 / Revision 0) and provide our advice below.

Purpose of plan

The CEMP scope is clearly laid out (pg. 4) with key requirements of the plan to:

- outline the environmental management framework, including roles, responsibilities and communication mechanisms; and
- set out management measures to prevent adverse impacts to environmental interests.

In addition to the CEMP, a Marine Pollution Contingency Plan (MPCP) has been included as Appendix E, which is to:

- provide a risk assessment of the potential sources and likelihood of pollution; and
- provide oil spill response procedures and actions, check sheets and industry examples.

Protected sites

Section 1.2.2 (pg. 25) lists several protected site designations that are in the vicinity of the offshore wind farm and export cable corridor. We highlight that the Firth of Forth Banks Complex is not a potential ncMPA as it was designated in 2014.

Plan iteration

Section 1.5 (pg. 42) clearly describes the arrangements for any required iteration to the CEMP. We do not anticipate that there would be significant involvement from NatureScot in this regard, but Marine Directorate may seek our advice where relevant.

Role of the Environmental Clerk of Works

The role of the Environmental Clerk of Works (ECoW) is clearly explained and adequately referenced in the CEMP – see section 2.3.10 (pg. 53). We welcome the ECoW role to review and quality check all consent plans and programmes, as well as to develop training materials on compliance with consent plans and the consents, for use by Inch Cape personnel in inductions and other awareness campaigns, etc.

We note that it is the Inch Cape Environmental Lead who will have responsibility for the MPCP and are content with these arrangements.

Communications

Section 2.4 and 2.5 outline the proposed arrangements for environmental reporting. This clearly sets out the lines of internal and external communication between Inch Cape staff, the project contractors, the independent ECoW and Marine Directorate.

Table 2.1 (pg. 60) outlines the proposed routine reporting requirements in which we will be included as a relevant stakeholder. We welcome the reference to include NatureScot in the circulation of the ECoW monthly compliance report. If necessary, we will be happy to provide advice or comments on these reports, or to take part in any associated discussions.

We note that there will also be monthly progress updates and that there may also be compliance reporting associated with the piling strategy. We would anticipate being consulted by Marine Directorate in this regard, when required.

We are also represented on the Forth & Tay Regional Advisory Group (FTRAG) and will receive project updates, mainly in respect of environmental monitoring, via FTRAG and its sub-groups. We confirm that we do not wish involvement in incident reporting (with the exception of standard procedures and guidance relating to oil spills where we may potentially be notified).

In line with other major construction projects, we recommend that Inch Cape provide a 24-hour customer service helpline for members of the public who may have queries about the onshore or offshore elements of this construction work.

We are also happy with the pollution incident response procedure as set out in the MPCP (Appendix E, pg. 131). Figure 4.1 (pg. 151) gives a very clear outline of the notification and reporting lines relating to any pollution incidents.

Environmental monitoring

Section 3.11 discusses the measures to prevent the introduction of marine Invasive Non-Native Species (INNS). We welcome the commitment that all contractors will adopt the relevant and most current legislative and good practice requirements. Specific measures are listed (pg. 79) and we highlight that further information can be found on Check Dry Clean on the GB Non-native Species Secretariat (NNS) website, available here: <http://www.nonnativespecies.org/checkcleandry/>.

A separate Project Environmental Monitoring Programme (PEMP) is to be prepared as required under the consent conditions, see table 1.1 (pg. 11). Section 3.2 (pg. 69-70) outlines the purpose of the PEMP. Additionally, we welcome the commitment for vessels to adhere to the Scottish Marine Wildlife Watching Code (SMWWC).

The differences between compliance monitoring (an auditing function to be undertaken by the ECoW as discussed through the CEMP) and environmental monitoring have been clearly articulated and we have no concerns in this regard.

Further information and advice

We hope this advice is of assistance.

Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Caitlin Cunningham

Marine Sustainability Adviser – Sustainable Coasts and Seas

caitlin.cunningham@nature.scot

SEPA

From: [Planning South](#)
To: [MD Marine Renewables](#)
Cc: [MD Marine Renewables](#)
Subject: PCS-20001818 SEPA Response to
Date: 18 June 2024 15:02:52
Attachments: [image.png](#)

Dear Iain McDonald

Marine (Scotland) Act 2010
Inch Cape Offshore Wind Farm - Post Consent Plan - Construction
Environmental Management Plan - Consultation

Thank you for the above consultation.

We note that the Construction Environmental Management Plan (CEMP) is mainly related to the offshore part of the Inch Cape wind farm. SEPA only comments in relation to matters related to our remit: the onshore part of the project. Section 2.2.1-Landfall Works- states that the Onshore CEMP has been prepared by ICOL in support of discharge of Condition 4 of Planning Permission in Principle 21/01474/PPM. East Lothian Council has already consulted SEPA in relation to that, therefore we have no comments to make for this consultation from Marine Scotland.

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,
Silvia Cagnoni
Senior Planning Officer



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fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhruid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.