

## Irvine S (Sophia)

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**From:** Karen Taylor <Karen.Taylor@nature.scot>  
**Sent:** 16 January 2020 15:07  
**To:** Irvine S (Sophia); MS Marine Renewables  
**Cc:** Wilson J (Jessica); MARINEENERGY  
**Subject:** RE: Neart na Gaoithe - Project Environmental Monitoring Programme Consultation - Response required by 21 January 2020

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sophia,

Thank you for your consultation on the Project Environmental Monitoring Programme (PEMP) submitted by Neart na Gaoithe Offshore Wind Limited (NnGOWL) to satisfy condition 23 of the Section 36 consent (as varied) and condition 3.2.2.14 of the Offshore Transmission Works marine licence (06678/19/1). We have reviewed the document supplied (NNG-NNG-ECF-PLN-0013) and considered it to be fit for purpose subject to our advice as detailed below.

### SNH advice

We welcome this PEMP and agree with the approach taken noting the relationship between this document which provides an accurate reflection of the key purpose and approaches to be used for environmental monitoring and the discussion and agreement of technical details via FTRAG and consultation with MS-LOT.

We recommend that there is a clear version control system of this document to ensure the most up to date version is being referred to at all times by all relevant parties.

Outlined below are a number of comments relating to specific paragraphs contained within the PEMP:

#### *Paragraph 12*

Mention is made of the MMO post consent monitoring strategic review (2014). Whilst it is useful to reference this, we would emphasise that the rationale for setting post consent monitoring for Scottish wind farms has been very different to that set for the Round 1 and 2 wind farms.

#### *Paragraph 13*

We acknowledge and welcome NnGOWLs commitment to be involved in strategic monitoring, particularly projects identified through the ScotMER process.

#### *Paragraph 23*

Table 4-2 presents those key species, SPAs and potential effects which have previously been agreed by FTRAG-O as being relevant to NnGOWL. Commentary should be provided in relation to these species / sites in light of the recent foraging range study being carried out on behalf of Crown Estate Enabling Actions for Round 4.

#### *Paragraph 38-40*

For each of the research questions that were *not agreed*, we suggest this should be re-worded to *not finalised*.

I trust this is of assistance.  
Best wishes,  
Karen

**Karen Taylor | Marine Sustainability Adviser**

Scottish Natural Heritage | 1 Kilmory Industrial Estate | Kilmory | Lochgilphead | Argyll | PA31 8RR | t: 0131 316 2693



Our Ref: MM/dr -19-034

Your Ref:

20 January 2020

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Dear Sirs

### **Neart na Gaoithe OWL PEMP**

The Scottish Fishermen's Federation, on behalf of the 400 plus vessels in membership of its 8 constituent associations, The Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association is pleased to comment on the draft PEMP which has been issued to us on 17/12/19.

In order for the plan to be referred to by the fishing industry there should be a copy kept by the FIR's, ref P4. In the introduction, chapter 1, there are many "consets" sic which needs to be edited.

On page 13, the SFF notes particularly the conditions on the OFTW, which emphasises any data collected should be compatible and comparable with recognised data sets. Further, there is acknowledgement that monitoring serves to verify "predictions" of the magnitude of impacts from the application and identify previously unknown threats, the SFF would consider this a very important clause.

The point on page 15 on the piling strategy should also consider the latest research from the Woods Hole Oceanographic Institute referring particularly to the effects of piling on squid, However, the SFF fails to see how PAM and MMO can be seen as mitigation for pile-driving.

Page 19, bullet point 1 & 2 in para 12, should recognise that the response to the licence application by the SFF identified a number of possible environmental constraints which were discounted in order to award the licence, so care must be taken that real monitoring is in place to ensure that the EIA was properly validated.

Page 19, 3.2.2.15 is surely the most illogical condition of all, the SFF cannot envisage any scenario where a developer's employee actually reports non-compliance to MS-LOT. Experience in other developments showed that developers did not report any problems.

Members:

Anglo Scottish Fishermen's Association · Fife Fishermen's Association · Fishing Vessel Agents & Owners Association (Scotland) Ltd ·  
Mallaig & North-West Fishermen's Association Ltd · Orkney Fisheries Association · Scottish Pelagic Fishermen's Association Ltd ·  
The Scottish White Fish Producers' Association Ltd · Shetland Fishermen's Association

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Page 20, table 3.1 referring to Commercial fisheries data, the SFF, would expect that Poseidon would be producing an exhaustive analysis of the baseline commercial fisheries relevant to the development and then analysing continuous monitoring.

Page 36, 6.2.94, as the above comment, must have a realistic baseline to start from, but going forward a simple analysis by port is not enough, it must be an analysis of data from the actual development area and a comparison with the surrounding area.

Page 36, 6.3.96, the bullet point on analysing VMS data, does not refer to current mapping? Without explicit permission from skipper/owner of a Fishing Vessel this is not allowed?

Page 37, 6.4.97, the final bullet point, monitoring should be extended to at least 3 years after completion to give a better view of real impacts. The only evidence so far suggests that after 2 years fishing has not returned.

Page 38, 7.2.101, the SFF would object to this line, as regards commercial fisheries it is our strong belief that there must be project specific fish monitoring to enable compliance with the PEMP.

Page 40, 8.2.105, Page 42, 9.2.110 and 116 should all reference the same project, Scot MER replaced Sporan. The SFF would expect the development to provide data and contribute to projects scoped by ScotMER to further knowledge of the impacts of developments.

However, the SFF would object to the decision 113 and 115 not to monitor benthic communities, which is viewed as vital work.

The SFF would further object to the claim in chapter 10 that scour and deposition is purely an engineering impact. It is our belief that the possibility remains for different species of shellfish to be buried at all stage of their lifecycle and this should be monitored.

Yours faithfully

**Malcolm Morrison**  
Fisheries Policy Officer

## Irvine S (Sophia)

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**From:** Fiona Read <fiona.read@whales.org>  
**Sent:** 17 December 2019 19:22  
**To:** MS Marine Renewables  
**Cc:** Sarah Dolman  
**Subject:** RE: Neart na Gaoithe - Project Environmental Monitoring Programme Consultation  
- Response required by 21 January 2020

Dear Sophia,

Thank you for including WDC in the consultation. Due to limited capacity, WDC will not be responding to the present consultation.

Best wishes,

Fiona

**Fiona Read**  
Policy officer  
*End Bycatch*

**WDC, Whale and Dolphin Conservation**  
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[whales.org](http://whales.org)

**PROTECTING WHALES AND  
DOLPHINS FOR OVER 30 YEARS**

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Dear Ms Irvine,

**NEART NA GAOITHE (NnG) – PROJECT ENVIRONMENTAL MONITORING PROGRAMME  
CONSULTATION**

Thank you for the invitation to comment on the above noted programme. RSPB Scotland support the proposed monitoring, including the seabird tagging and sea survey work.

Offshore wind poses a significant risk to breeding seabirds and we have stated consistently throughout the applications process for NnG, and other offshore wind farm proposals in Scotland, the importance and need for a comprehensive monitoring package. This is particularly relevant due to the evidence gaps that exist in our knowledge of wind farm/ seabird interactions and the proximity of NnG to internationally designated seabird colonies. We need to better understand the risks posed to these populations.

The strength of commitment and the foresight of the NnG team to implement the proposed monitoring, whilst leading the call for collaboration across the Forth and Tay Regional Advisory Group (FTRAG) will enhance the value of the monitoring. In this regard, we welcome the approach taken to undertake consistent aerial surveying across all three projects in the Forth and Tay and are grateful for the opportunity to be involved in the development of the programme.

The commitment by NnG to also progress monitoring of the breeding populations to better understand any effects is also welcomed. However, we note this commitment is subject to further discussion and wish to emphasise the need for this aspect of monitoring to be implemented to provide as comprehensive understanding of population effects as possible. We therefore urge all members of FTRAG-Ornithology to clarify how this work can be undertaken so that it may commence as soon as possible.

With a view to the wider context, the huge potential for offshore wind to support achievement of our net-zero targets will see much greater levels of deployment. There lies the additional value of delivering robust monitoring now. Future expansion can then take full and informed account of the sensitive natural marine environment. An approach that is needed to ensure actions taken to address the climate emergency also help, rather than hinder, our efforts to address the biodiversity crisis. The direct linkage to Scotland's draft Offshore Sector Plan for Offshore Wind are clear.

We look forward to engaging in greater detail on the proposed monitoring programme.

Yours sincerely,

{SENT BY EMAIL}

Charles Nathan

Head of Planning & Development