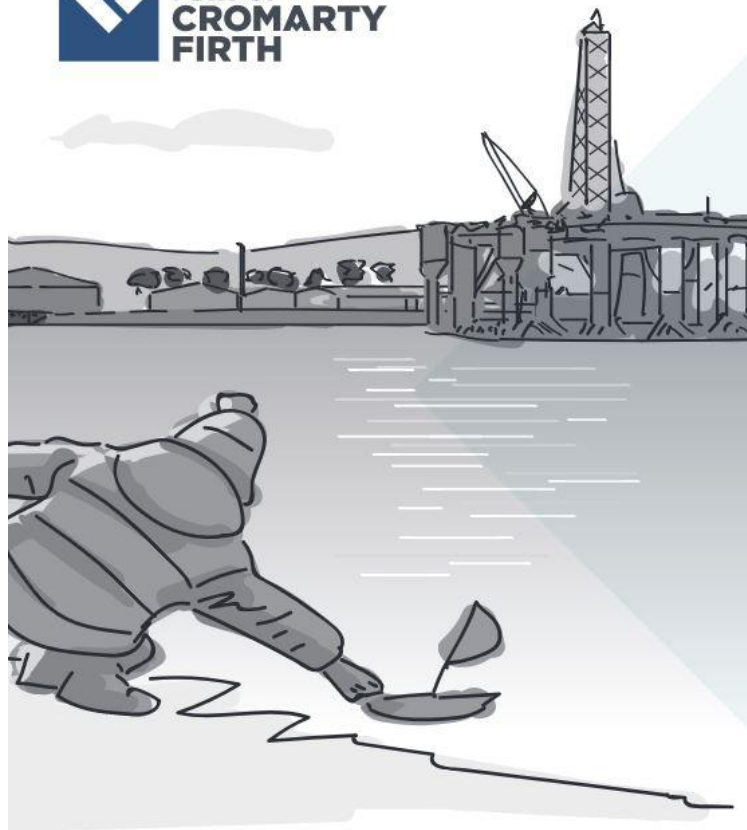


# Invergordon Service Base Phase 5 Development Pre-application Consultation Report



WHERE VISION CREATES GROWTH

Date: 25 <sup>th</sup> January 2025	By: Alex Johnson
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# 1 Introduction

This Pre-Application Consultation (PAC) report lays out the public and stakeholder engagement carried out to support the marine licence application for the Phase 5 Development of the Invergordon Service Base (ISB) by Port of Cromarty Firth (PoCF). The purpose of this report is to capture, analyse and review the output of the consultation undertaken with local stakeholders in relation to the proposed development.

This report provides a brief description of the development, and the legislative requirements that both the development itself, and the consultation process, must satisfy. Before describing the consultation undertaken in detail and discussing the outputs of the engagement process, an evaluation of the overall process in terms of its effectiveness against the Planning Aid for Scotland's SP=EED framework (Scottish Planning = Effective Engagement and Delivery) is also provided.

The report has been completed by PoCF, but the views expressed, and conclusions reached are those of the respondents who provided feedback (including by completing the project feedback questionnaire) and do not necessarily represent the views of PoCF.

In preparing this document PoCF has made every effort to ensure that the content is accurate, up-to-date and complete. In doing so, PoCF makes no warranty as to the accuracy or completeness of material supplied by those taking part in the consultation.

The PAC Report Form has been completed in line with legislation. The details with regard to Questions 1, 4, 5, 6, 7 and 8 of the form are provided within this document to allow a comprehensive response to be provided.

## 1.1 Port of Cromarty Firth's Stakeholder Engagement

PoCF is a strategic national asset that drives economic growth, prosperity and opportunity in the Cromarty Firth, the wider Highlands, and across Scotland. As a Trust Port, duties include the maintenance of safe navigation throughout the Firth, responsible management of the industrial activities within the Firth's waters, and the creation of jobs and business opportunities for people living and working in and around the Firth.

The Port's stakeholders are varied and numerous. Some are connected to the harbour operations, e.g. users or employees. Others are impacted by Port activities, such as the local community and regional economies. Transport Scotland's Modern Trust Ports for Scotland: Guidance for Good Governance (Scottish Government 2012) states that, whilst stakeholders will vary from port to port, the following groups may all be considered stakeholders of a trust port:

1. Port users;
2. The local community;
3. Local and regional economies and authorities;
4. Port employees including Trade Unions;
5. Related interest groups;
6. The national economy and Central Government; and
7. Local and regional businesses.

### 1.1.1 Port users

The Port hosts quarterly meetings with a Port Users group, providing an opportunity to update tenants and users of the Port on current activities, future plans for port development, business opportunities for port user businesses and to receive feedback and answer questions regarding port activities.

More regular meetings, including health and safety meetings, toolbox talks, and project-specific meetings take place with port users as projects require.

A quarterly newsletter is issued by the Port and available to all stakeholders. The Port also undertakes a monthly programme of public relations via traditional media and social media, to ensure all stakeholders are aware of activities taking place and future expansion plans.

### 1.1.2 The local community

Nine communities directly border the Cromarty Firth: Nigg & Shandwick, Kilmuir Easter & Logie Easter, Saltburn & Westwood, Invergordon, Alness, Kiltearn, Ferintosh, Resolis, and Cromarty. As one of the Port's most important stakeholders, communicating and interacting with them is a vital element of the Port's regular community and stakeholder engagement.

PoCF holds quarterly joint community council meetings and representatives from each community council are invited to attend. The meetings provide updates on Port activities, details about future plans, and an opportunity for community representatives to ask questions or raise any concerns or complaints about port activities that they have received from their community. Over the last three years the Port's potential expansion plans for the Phase 5 Development have been a regular topic of discussion at these meetings.

A quarterly newsletter is issued by the Port and available to all stakeholders. The Port also undertakes a monthly programme of public relations via traditional media and social media, to ensure all stakeholders are aware of activities taking place and future expansion plans.

### 1.1.3 Local and regional economies and authorities

PoCF is a major employer and facilitator of economic activity in the region and is therefore of significant importance to the Local Authority (The Highland Council), Enterprise Agencies (Highlands and Islands Enterprise (HIE)) and other associated stakeholders.

An account manager is employed by HIE to liaise with PoCF and relationships were further strengthened with this stakeholder group between 2020 and 2025 through the Inverness and Cromarty Firth Green Freeport initiative, led by PoCF. The Highlands Council and HIE were both critical members of the ~40-strong consortium.

Regular meetings take place between a large number of employees of PoCF and both The Highland Council and HIE.

### 1.1.4 Port employees including Trade Unions

PoCF employs ~42 Full Time Equivalent (FTE) members of staff, plus a similar number of security officers, employed via a contractor (Kingdom Security). Quarterly staff meetings are held, in order to update employees on current activities, expansion plans, financial results etc.

Quarterly staff newsletters are also produced, and regular email updates are circulated. Department managers hold regular departmental meetings and, as a small team, most employees engage with each other and their Line Managers on a daily basis.

A number of port employees are members of trade unions. This is fully supported by PoCF and engagement is on an as-required basis.

### 1.1.5 Related interest groups

By its nature, PoCF engages with a large number of related organisations, including regulators (e.g. Marine Directorate, Transport Scotland, Maritime and Coastguard Agency), statutory stakeholders (e.g. NatureScot, SEPA, Northern Lighthouse Board), industry bodies (e.g. British Ports Association, Port Skills and Safety, Scottish Renewables) and many others.

Engagement tends to be on a regular basis via a number of forums. This can include consultations for specific developments or activities, or discussions at relevant industry events.

### 1.1.6 The national economy and Central Government

As a strategic, national asset, PoCF is of importance to the national economy and regular engagement takes place with both Members of the Scottish Parliament (MSPs) and Members of UK Parliament (MPs).

Meetings and discussions with constituency MPs and MSPs typically takes place at least twice a year, whilst engagement with a broader range of politicians is undertaken in line with activities at the Port and within its target industry sectors. This can be at the request of either PoCF or the relevant politician.

### 1.1.7 Local and regional businesses

As a major employer and facilitator of economic activity, PoCF activities impact a large number of local and regional businesses. Engagement is typically via quarterly newsletters and ongoing media and social media activities.

PoCF is also a member of the Inverness Chamber of Commerce, and of Prosper. These memberships facilitate engagement with the local business community outwith the Port. Engagement was also increased beyond port users through the Green Freeport consortium.

Once a year, PoCF also hosts an annual public meeting, which is open to all stakeholders. This is typically held in the autumn, following approval of the annual accounts from the previous year. Following the Covid-19 pandemic, these meetings are now typically held online, which allows a wide variety of stakeholders to attend. The meetings are also recorded and uploaded onto the Port's website for people to watch for a period of time following the meeting.

The ongoing community and stakeholder engagement outlined above is additional to the Port's specific communication for the proposed Phase 5 Development to ensure the Port met the PAC legislative requirements regarding consultation. This is outlined in the following sections.

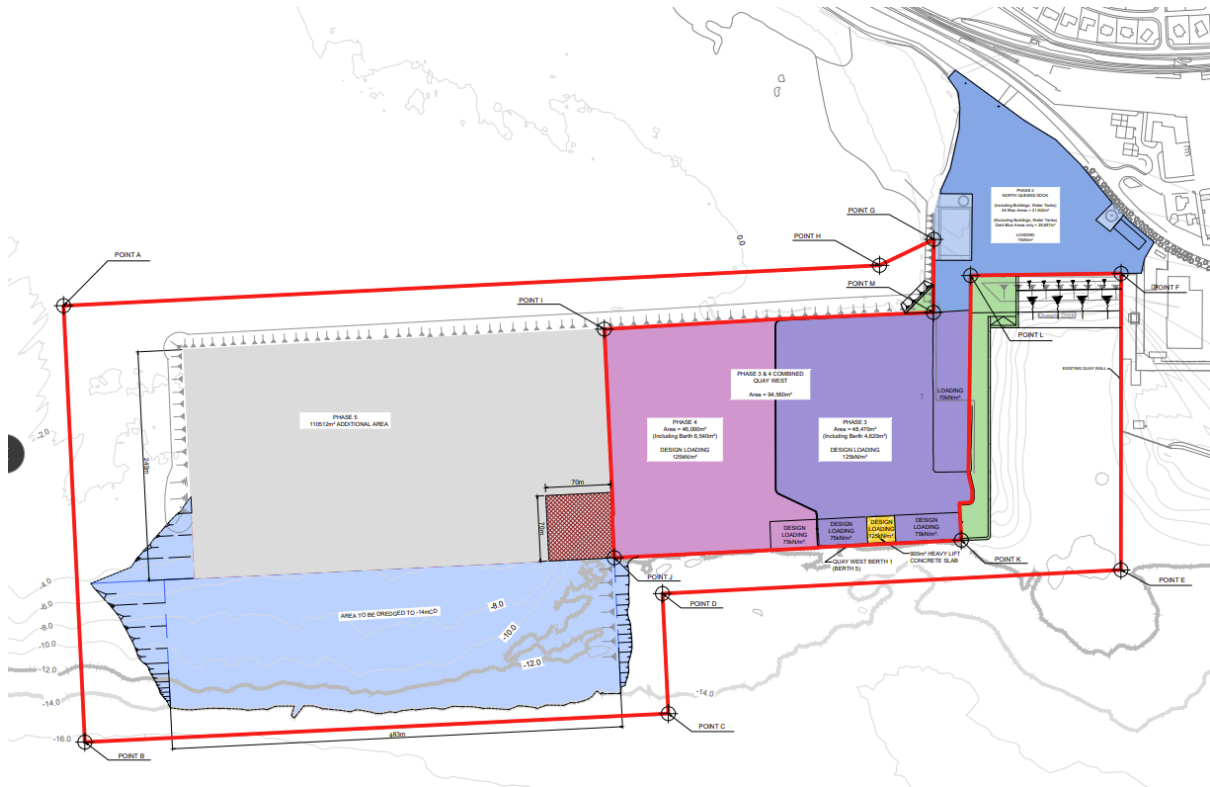
## 1.2 Project Description

The Phase 5 proposal constitutes the following elements:

- Quay West Extension
- Laydown area
- Heavy Load Pad
- Queens Dock West Berth

- Ro-Ro
- Widening of Access to Quay West
- Quayside furniture; and Associated Services

A full description is provided in Chapter 2, in volume 2 of the Environmental Impact Assessment Report (EIAR).



## 2 Engagement Strategy

### 2.1 Overview

The proposed development will have the potential to interact with existing social, cultural, aesthetic and environmental settings. It is therefore vital that stakeholders (organisations, communities and individuals etc.) in the local vicinity and further afield with an interest in the project are able to be involved in its development.

### 2.2 Engagement Principles

The consultation and engagement strategy was founded on sound principles and best practice drawn from the organisation's professional experience as well as Planning Aid for Scotland's SP=EEED framework (Successful Planning = Effective Engagement and Delivery) -PAS-SPEED-Practical-Guide-July-2022.



## 2.3 Engagement Objectives

PoCF aimed to engage in constructive dialogue with all stakeholders (including those groups outlined in Section 1.1 above) who have an interest in the project, whether as a result of their activities or by merit of their location. This enabled the development to benefit from the considerable experience of the stakeholders and allowed the project to develop with the involvement of those stakeholders that will ultimately be impacted by the development.

PoCF's objectives in relation to the engagement process can be summarised as follows:

- To understand stakeholder concerns and interests to ensure that they are appropriately considered and addressed as part of the project;
- To receive feedback and ideas about improvements that could be made to the Phase 5 Development;
- To fulfil marine licensing obligations; and
- To achieve best practice in engagement.

## 2.4 Stages of Engagement

Informal engagement regarding the proposed Phase 5 Development has been ongoing for ~3 years, including sharing prospective designs and ideas through the quarterly and annual stakeholder meetings outlined in Section 1.

Engagement activities took place as the project and followed the established pattern outlined below:

- Identify: identification of stakeholders;
- Communicate: provide appropriate information to stakeholders;
- Consult: discussing issues which influence the final design of the development;
- Communicate again: provide information to stakeholders detailing the results of the consultation; and
- Record: throughout the engagement PoCF systematically captured the views and opinions of all stakeholders.

This engagement was primarily with joint community council and ports user groups, representing those with the greatest interest in the development and those who would be most impacted.

The formal PAC consultation took the form of a public consultation event, digital engagement and feedback questionnaires and it outlined in detail in the following sections.

## 2.5 Main Areas Consulted On

The engagement programme focused on minimising negative impacts on the area, and particularly on the town of Invergordon, and maximising positive impacts (wherever possible; taking account of technical and environmental constraints).

This included:

- Positive and negative impacts to Invergordon and the Cromarty Firth; including economic, environmental and social considerations;
- Maximising benefits for local people;
- Maximising benefits for local businesses; and
- Improvements that would enhance the design to accommodate a greater number of users and to future-proof the facility as much as possible.

As part of the engagement process, PoCF provided:

1. Details of their plans for the Phase 5 Development;
2. The Development's prospective uses;
3. The potential effects on the environment, through construction and operational phases;
4. The potential effects on local residents through construction and operational phases; and
5. How PoCF aims to minimise any negative effects and maximise positive effects arising.

## 3 Consenting Context– Legal Requirements

### 3.1 Marine Licence

Under the Marine (Scotland) Act 2010 a number of activities listed in Part 4, Section 21 of the Act require a marine licence issued by the Marine Directorate Licensing Operations Team (MD-LOT). This includes any activity where the project intends to do any of the following below Mean High Water Springs (MHWS):

- Deposit or remove substances or objects in the sea either on or under the seabed;
- Construct/alter/improve any works in or over the sea or on or under the seabed;
- Remove substances or objects from the seabed; or
- Dredging activity.

The entire Phase 5 Development will be below MHWS and hence the construction will require a marine construction licence. In addition, there will be a requirement for a

capital dredge with spoil disposal at sea, which requires a dredge and sea disposal marine licence. Hence two marine licence applications are being submitted.

## 3.2 Environmental Impact Assessment

Schedule 2 of The Marine Works (Environmental Impact Assessment (EIA)) (Scotland) Regulations 2017 lays out projects that could be subject to EIA. The Phase 5 Development falls under two parts within the Infrastructure Projects section namely:

- 10(g) Construction of harbours and port installations, including fishing harbours where the area of the works exceeds 1 hectare (ha); and
- 10(m) Coastal work to combat erosion and maritime works capable of altering the coast through the construction.

Due to the nature, scale and location of the works, it was assumed by PoCF that the Phase 5 Development would be classed as an EIA project. Hence, PoCF opted not to undertake screening under the EIA regulations.

## 3.3 Marine Pre-Application Consultation (PAC)

The Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013 prescribe the marine licensable activities that are subject to PAC and, in combination with the Marine (Scotland) Act 2010, set out the nature of the pre-application process. The Phase 5 Development qualifies as a project requiring PAC because it incorporates:

- A deposit or object within the Scottish marine area for the purposes of reclaiming land of over 1 ha; and
- Construction of works within the Scottish marine area that exceeds 0.1 ha.

## 4 Consultees

PoCF identified the following key groups and individuals to be consulted regarding the proposed Phase 5 Development. This was based on existing engagement activity and the stakeholder groups listed in Transport Scotland's Modern Trust Ports for Scotland Guidance for Good Governance (as per Section 1).

Additionally Northern Lighthouse Board (NLB), Maritime and Coastguard Agency (MCA), Scottish Environment Protection Agency (SEPA) & NatureScot are required to be notified that an application for a marine licence is to be submitted under item 6(2) of The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013.

The Statutory Consultees contacted during the PAC process were:

- Marine Directorate;
- Northern Lighthouse Board (NLB);
- Maritime and Coastguard Agency (MCA);
- Scottish Environment Protection Agency (SEPA);
- NatureScot; and.
- Highland Council including the following departments:
  - Environmental Protection- with specific regard to in-air noise impacts; and
  - Planning and Environmental Services – including specific discussions on Landscape and Visual Impact Assessment.

Port Users including the following groups are key stakeholders for any port activities, these include:

- Invergordon Service Base Users;
- Other marine users e.g. Invergordon Boat Club;
- Ground Handling companies;
- Shipping Agents;
- Royal National Lifeboat Institute (RNLI);
- Private Facility owners: Global Energy Group, Bannerman Co. Ltd and Highland Deephaven.

Port employees including Trade Unions could be directly affected and hence are stakeholders:

- Port employees;
- Subcontractors;
- Agency staff; and
- Union representatives.

Communities bordering the Cromarty Firth can be affected by port activities. There are ~18,000 residents living in nine communities which border the Cromarty Firth. Engagement has involved all nine community councils namely:

- Nigg & Shandwick Community Council;
- Kilmuir and Logie Easter Community Council;
- Saltburn Community Council;
- Invergordon Community Council;
- Kiltearn Community Council;
- Alness Community Council;
- Ferintosh Community Council;
- Resolis Community Council;

- Cromarty Community Council;
- Residents of Invergordon;
- Individuals living and working in and around the Cromarty Firth.
- Cromarty Firth constituency MSPs: Kate Forbes, Rhoda Grant, Edward Mountain

Aviation Interest Groups were specifically contacted to discuss issues associated with the potential for cranes and Fully Integrated Floating Offshore Wind Turbines (FOWT) to be present at an Extended Quay West during the operational phase.

- Highland and Islands Airports Ltd (HIAL);
- Maritime and Coastguard Agency;
- Bristow's (operator of helicopters for MCA);
- Scottish Ambulance Service;
- Highland Council – Operators of Dornoch Airfield;
- Ministry of Defence;
- Highland Aviation; and
- Civil Aviation Authority.

There have also been specific discussions on ornithological interests with

- NatureScot
- Royal Society for the Protection of Birds (RSPB) (Scotland).

Discussions around housing and training provisions were included and involved detailed discussions with Inverness and Cromarty Firth Green Freeport.

In addition to formal consultation the following stakeholders have been made aware of the project:

- Transport Scotland;
- Cromarty Firth MPs: Jamie Stone and Ian Blackford
- Local and Regional Businesses;
- Prosper (formerly Scottish Council for Development and Industry);
- Inverness Chamber of Commerce;
- Scottish Development International; and
- Cruise Stakeholder Group.

The Port also undertook detailed engagement with a large number of potential users of the Phase 5 Development. This was mostly undertaken under non-disclosure agreements for reasons of commercial confidentiality and included:

- Vessel owners;
- Offshore wind developers;

- Crane owners; and
- Transport and Installation Contractors.

This list is not exhaustive.

## 5 Methodology for Stakeholder Engagement

### 5.1 Statutory Requirements

The Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013, in combination with the Marine (Scotland) Act 2010, set out the nature of the pre-application consultation process. Marine Scotland's Guidance on Marine Licensable Activities subject to Pre-Application Consultations states that the Port must comply with the following requirements:

- Public pre-application consultation consists of at least one public event where local communities, environmental groups, NGOs, regulators and other interested parties are given the opportunity to consider and comment upon a prospective application for those marine licensable activities that are prescribed in the Regulations.
- The prospective applicant must notify the following statutory consultees that an application for a marine licence for a prescribed activity is to be submitted to MD-LOT:
  - NLB;
  - MCA;
  - SEPA;
  - NatureScot; and
  - Any delegate for the relevant marine region or regions, when such delegates have been established under Section 12(1) of the Marine (Scotland) Act 2010.
- The notification should include basic information relating to the application and include the time and location of the consultation event. The notification must be made at least 6 weeks in advance of the event.
- No less than 6 weeks in advance of the pre-application consultation event, the prospective applicant must also publish in a local newspaper a notice containing:
  - A description, including location, of the marine licensable activity;
  - Details as to where further details concerning the activity may be obtained;

- The date and place of the pre-application consultation event;
  - A statement explaining how persons wishing to provide comments may do so and the date by which this must be done; and
  - A statement clarifying that comments are made to the prospective applicant and not to MD-LOT and that there will be an opportunity for representations to be made to MD-LOT on the application;
- The consultation event must be held in a suitably accessible venue.
  - The venue must be suitably accessible both in terms of allowing physical access by persons of impaired mobility, and being local to the proposed marine licensable activity. This is to allow the provision of information to, and attendance by, persons who are most likely to have an active interest in the proposed activity. The venues in which these events are held are likely to vary in size and nature, dependent largely upon the availability of public buildings in those parts of Scotland close to where the proposed marine licensable activities are to take place. It is expected by MD-LOT that the typical venue which will be used will be a local town hall or hotel.

## 5.2 Model for Stakeholder Engagement – SP=EED

The stakeholder engagement strategy was further guided by the principles laid down in Planning Aid for Scotland’s SP=EED framework (Scottish Planning = Effective Engagement and Delivery).

The framework was used in preparing the consultation plan with a view to:

- Planning the engagement well before the process began;
- Explicitly stating the objectives of the process;
- Managing public expectations;
- Identifying suitable approaches;
- Effectively managing the consultation process; and
- Evaluating the learning from the experience.

## 5.3 Criteria for Selecting Engagement Methods

The effectiveness of any stakeholder engagement strategy is ultimately dependent upon the appropriateness and robustness of the actual methods of engagement selected. In this regard, a number of key criteria were considered when determining which methods to employ. These are detailed in Table 1.

**Table 1: Engagement Methods Selection Criteria**

Criteria	Options
<b>Stage</b>	<ul style="list-style-type: none"> <li>• Very early stages may require more informative techniques to establish a knowledge base amongst stakeholders;</li> <li>• Subsequent stages will be more participative and interactive as the consultation seeks to canvas the views and comments of stakeholders; and</li> <li>• Later stages are likely to involve further informative elements to disseminate the findings and evaluate the effectiveness of</li> </ul>
<b>Stakeholders needs</b>	<ul style="list-style-type: none"> <li>• Language;</li> <li>• Accessibility; and</li> <li>• Support services (e.g.: for those with caring responsibilities).</li> </ul>
<b>Type of data</b>	<ul style="list-style-type: none"> <li>• Quantitative – used for categorising, measuring, profiling;</li> <li>• Qualitative – gathering opinions, feelings, and suggestions; Balance to be struck between capturing more complex, in depth responses from fewer stakeholders and less detailed input from a larger number of participants; and</li> </ul>

## 6 Stakeholder Engagement Programme

This section details the methods of stakeholder engagement that were selected to fulfil the objectives of the consultation plan during the pre-application stage of the project.

The results of each engagement activity were monitored to ensure that the engagement programme met or exceeded agreed standards. Consistent reporting techniques were utilised throughout to ensure that the output could be compared.

### 6.1 Public Consultation

Public consultation on the Phase 5 Development began informally in 2021, with a number of meetings with statutory stakeholders, including MD-LOT and The Highland Council.

The plans, as they have developed over the years in line with feedback from stakeholders, (including mainly prospective users and supply chain companies,) have been shared openly via the Port’s quarterly meetings with joint community councils, staff, and port users. They have also been included in the Port’s Annual Public Meeting and a number of the Port’s quarterly newsletters. This ongoing two-way engagement has provided ongoing feedback regarding the design and provided an opportunity to answer questions from the community and receive their feedback on the plans and their prospective impacts.

The development plans also formed part of the Inverness and Cromarty Firth Green Freeport proposal, which was a process begun in March 2020, formally applied for in 2022 and successfully awarded in January 2023. As part of the Green Freeport bidding process, a large number of public events and stakeholder engagement activities took



place, and included the prospective developments at land holdings across the Green Freeport zone. This included the proposed Phase 5 Development. These events took place over a wider, Inner Moray Firth area, and included stakeholders from a much broader geography, to take into account the different landholdings.

### 6.1.1. Public Consultation 2024:

A public notice was published in the Inverness Courier and Ross-shire Journal newspapers on Friday 13th September 2024 and was repeated on Friday 18<sup>th</sup> October 2024.

One-way communications were primarily used to raise awareness that PoCF had issued further details of the proposed development and to promote the pre-application consultation event.

The event itself then provided an opportunity for two-way communications.

**Table 2: 2024 Engagement Techniques**

#### One Way Communications

Channel	Pros	Cons
<b>Advertisements in Local Newspapers and on their Digital and Social Media Sites</b>	Reaches local people who may not be reached via other methods. Leads them to further information online / at public event.	Local newspaper readership is declining.
<b>Social Media Advertising</b>	Reaches target audience based on location, improves awareness.	Potential for impact to diminish over time.
<b>Website</b>	Reaches people with transport / mobility issues. Gives people time to research and consider the information.	Access to further info on websites relies on digital / online accessibility.
<b>Leaflet drop to 15,000 households covering IV16, IV17, and IV18 postcodes.</b>	Awareness covering households by postcode area supports digital inclusion.	May not be read.
<b>Exhibition displays in Library and Leisure Centre</b>	Reaches people who may not follow business news.	May not be interacted with.

#### Face to Face

Channel	Pros	Cons
<b>Port User Networking Lunch Presentations (11<sup>th</sup> April 2024 and 11<sup>th</sup> July 2024.)</b>	Face to face contact ensures attendees understand issues and detailed information.	Attendees may not represent the majority opinion.

<b>Joint Community Council Meetings (11<sup>th</sup> April 2024 and 11<sup>th</sup> July 2024)</b>	Face to face contact ensures attendees understand issues and detailed information.	Attendees may not represent the majority opinion.
<b>Staff Meetings (21<sup>st</sup> May and 14<sup>th</sup> August 2024)</b>	Allow detailed analysis of a complex situation to be conducted addressing attitudes and motivations.	High potential for interviewer bias.
<b>Community Council and Port User Preview Event (28<sup>th</sup> Oct 2024)</b>	Face to face contact ensures attendees understand issues and detailed information.	Attendees may not represent the majority opinion.
<b>Exhibition/ Public Event 29<sup>th</sup> Oct 2024)</b>	Can attract stakeholders not previously reached.	Potential to miss people who are unable to drive.

To avoid confusing and conflicting messages, close attention was paid ensuring all information source content was consistent and accurate. While each tool played a different role in the communications strategy, overall themes were replicated.

It was anticipated that adverts and the public notice would signpost stakeholders to the other, more detailed, sources of information, such as the website and public event.

This exhibition provided more comprehensive information including:

- The need for the development;
- An overview of the project components;
- The site layout and design; and
- Sustainability topics, including landscape and visual effects, ecological, economic and social impacts.

Achieving a robust level of participation was heavily reliant on effectively publicising the consultation processes and activities. PoCF used an ongoing marketing communications programme combining different media to reach as broad an audience as possible.

## 6.2 How the Port Met (and Exceeded) the Statutory Requirements

<b>Requirement</b>	<b>Activity</b>
1: The prospective applicant must notify the statutory consultees that an application for a marine licence for a prescribed activity is to be submitted to MD-LOT.	Formal notification was emailed to the statutory consultees on the 16 <sup>th</sup> September 2024 (example letter provided in Appendix 15.4). The notification included basic information relating to the application (background to the project, proposed design drawing and the programme and project plan) and a copy of the public notice, which detailed the time and location of the consultation

	<p>event (29<sup>th</sup> of October 2024). The notification was made at least six (6) weeks in advance of the event.</p>
<p>2: No less than 6 weeks in advance of the pre-application consultation event, the prospective applicant must also publish in a local newspaper a notice containing information as outlined in the Statutory Requirements section above.</p>	<p>A public notice was placed in the main local papers (see Media and Reach section below) more than six weeks prior to the pre-application consultation event containing the information stipulated in the Regulations.</p> <p>Further, the public notice was re-run in the Inverness Courier and Ross-shire Journal just prior to the event to provide additional notification.</p> <p>The pre-application consultation event was promoted via social media and also through the Port’s regular stakeholder meetings with employees, Port users and the nine Community Councils that border the Firth.</p>
<p>3: Public pre-application consultation consists of at least one public event where local communities, environmental groups, NGOs, regulators and other interested parties are given the opportunity to consider and comment upon a prospective application for those marine licensable activities that are prescribed in the Regulations. The consultation event must be held in a suitably accessible venue.</p>	<p>Consultation with stakeholders regarding this project began in 2021. It has included a number of face-to-face events and engagements, as outlined throughout this document.</p> <p>A pre-application consultation event was held on the 29<sup>th</sup> October 2024 at the Port Offices. This location was selected due to its proximity to the proposed development and the primary stakeholders impacted, plus the fact that it would provide access to a wide variety of members of Port staff who could answer questions raised. The event was open from 11am to 8pm to allow people time to visit during lunch hours / after work. It was held in a ground floor meeting room to provide access for stakeholders with impaired mobility.</p> <p>The information shared at the event was also uploaded onto the Port’s website and shared via interactive exhibition</p>

	<p>displays which were erected in the Invergordon library for one week and Invergordon Leisure Centre for one weekend.</p> <p>Additional meetings were held on specific topics with relevant parties as detailed in Section 8.2.</p>
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## 6.3 Media and Reach

The main communication methods used in the pre-application consultation were:

### 6.3.1 Advertising:

Public notices were placed in the local papers outlined below providing the necessary notice period for the public event. Copies of the public notice and the larger adverts are included in Appendix 15.1 and 15.2.

Media	Circulation	Readership
Ross-shire Journal	3,403	11,325
Inverness Courier	10,396	33,884

In addition, digital adverts were published for two weeks on Meta. The adverts returned 24,777 impressions with a reach of 8,505, 883 post engagements and the advert was clicked on 2,022 times.

#### Port Stakeholder Groups:

Group	Membership	Reach
Port Users	50	<2000 (inc. employees)
Cruise Stakeholder Group	42	~100 (difficult to quantify)
Staff	<42	~120 (avg each tells 3 people / family members)
Joint Community Councils	9	45 (avg. 9 people attend each CC Meeting and report back to their committees.)

As outlined in Section 1, PoCF holds quarterly meetings with Port users, employees and the nine Community Councils that border the Firth. It also regularly meets with its cruise stakeholder group. All groups were informed about the development and pre-application consultation. Details were given of the public event, and people were asked to provide their feedback and share their ideas. The development has also been included in the Port's Annual Public Meetings on Thursday 28th September 2023 at Ross Sutherland Rugby Club and the meeting streamed online on Thursday 26th September 2024.

## 7 The Pre-Application Consultation (PAC) Event

### 7.1 Description of the PAC Event 2024

A preview event was held on the evening of Monday 28<sup>th</sup> of October between 6pm and 8pm followed by a public exhibition on the 29<sup>th</sup> of October 2024 at the Port Offices in Invergordon between the hours of 11am and 8pm. Hard copies of feedback questionnaires were made available to attendees at both events and QR codes with links to the online version on Survey Monkey were distributed with a return date of the 11<sup>th</sup> November 2024 for consideration in the Marine Licence application. A copy of the questionnaire is included in Appendix 15.3.

### 7.2 Information Provided at the PAC Event 2024

Eight exhibition boards were displayed at the event outlining:

- Board 1: Thank you for coming – Port artist impression;
- Board 2: About Port of Cromarty Firth;
- Board 3: Drivers for Phase 5;
- Board 4: The Proposed Port Development;
- Board 5: How We Will Build It;
- Board 6: Environmental Considerations;
- Board 7: Environmental Considerations; and
- Board 8: Have Your Say.

The board artwork is included at Appendix 15.5.

In addition to the exhibition boards, a viewpoint map and a variety of photomontages were provided, showing the current berth infrastructure, the proposed development, and the proposed development with three FOWT positioned along the Extended Quay West.

A video fly through of the 3D model showing the Extended Quay West with three FOWT, was shown on a loop on a screen during the exhibition. The video provided an understanding of visual impacts from various locations within Invergordon, including those experienced by those travelling east to west along the High Street.

The contents of the eight exhibition boards were displayed on the Port's website for the period whilst the pre- application consultation was open, along with details about the development and how and when to respond.

Video content was also available on the website and on a touchscreen plinth at the preview event on the 28<sup>th</sup> October and the PAC exhibition on the 29<sup>th</sup>. The screen was then located in Invergordon library for a week and Invergordon Leisure Centre the

following weekend, allowing for additional engagement in the community and with a view to including people the Port had not already reached.

## 8 Analysis of Stakeholder Engagement Feedback

### 8.1 Comments Received at the PAC Event 2024

A total of twenty-nine people attended both the preview event and PAC exhibition, and the information was also shared on the Port's website (<https://pocf.co.uk/phase-5-safeguarding-port-of-cromarty-firth-for-future-generations/>).

Three feedback questionnaires were received prior to the closing date of the 11<sup>th</sup> November 2024.

The full results are included at Appendix 15.6.

Comments received from attendees at the event and subsequently via the online questionnaire regarding the project and responses are listed below:

*“What core sampling has been done to check that there is sufficient silt there to dredge?”*

Details of the sampling and results are included with the EIAR. More information can be found in the Chapter 7: Coastal Processes, in Volume 2 of the EIAR and in the Dredge Licence Best Practicable Environmental Option Report. A detailed ground investigation exercise was completed, including core sampling, to inform the design and dredge licence application.

*“Does the dredging profile allow enough wriggle room for all vessel sizes to turn round to berth alongside your new wharfage?”*

The dredge design takes into account the existing bathymetry and vessel requirements to ensure there is adequate water depths for vessel berthing alongside the Extended Quay West. More information can be found in the Dredge Licence Best Practicable Environmental Option Report and Chapter 2: Project Description of Volume 3 of the EIAR.

*“Have your current pilots been asked for their opinions on the planned expansion?”*

The Port's Pilots and Marine team were consulted at every stage of the development and will continue to be as required. Further details are included throughout this PAC Report.

*“What steps will be taken to prioritise noise reduction?”*

PoCF recognises the importance of being a good neighbour and keeping noise levels as low as practicable throughout the project. A noise impact assessment has been completed for construction and FLOW operational scenarios this is presented in Chapter 6: In-air Noise, in Volume 2 of the EIAR. No significant effects have been identified for the

construction works. The Port will work with FLOW developers to ensure that their projects appropriately manage noise during the operational phase.

*“What plans if any are in place to employ local residents and contractors?”*

As a Trust Port, PoCF believes that one of its duties is to create high-quality, meaningful work for people living in the region. A socio-economic assessment has been completed for construction and operational scenarios. This is included in Chapter 10: Socio-economics and Human Health, in Volume 2 of the EIAR. It is anticipated that the Phase 5 Development will generate an estimated 170-320 FTE jobs during the construction phase, and 280-1000 jobs during operations, depending on the realised design. It is projected that the vast majority of the net additional economic benefit will be retained within the Inner Moray Firth.

The agreement signed between PoCF and the Green Freeport contains a Fair Work Charter, which commits the Port and its end users (tenants) to practices including creating pathways to employment for new employees, including apprentices, young people and those with barriers to employment. (See Section 9 below for further details.)

*“Will a community benefit fund be set up similar to what has already been put in place by onshore wind farm developers?”*

It is projected that the development will generate £34.9M-£84.3M of Gross Value Added (GVA) and £17.6M-£45.3M of income in the Highlands during the construction phase, depending on the final design. During operations, an estimated £30M-£100M net additional GVA is forecast per annum and £11.9M-£47.7M of net additional income per year for the Highland Council Area. Further details are included in Chapter 10: Socio-economics and Human Health, in Volume 2 of the EIAR.

The Green Freeport includes a Skills and Innovation Fund which has been established to help secure the skilled workforce needed for the expansion of activity and to support work-based learning, upskilling and industry-related training associated with activity within the Green Freeport. Contributions are payable by companies benefiting from the National Insurance Reliefs within the Green Freeport tax sites. (See Section 9 below for further details.)

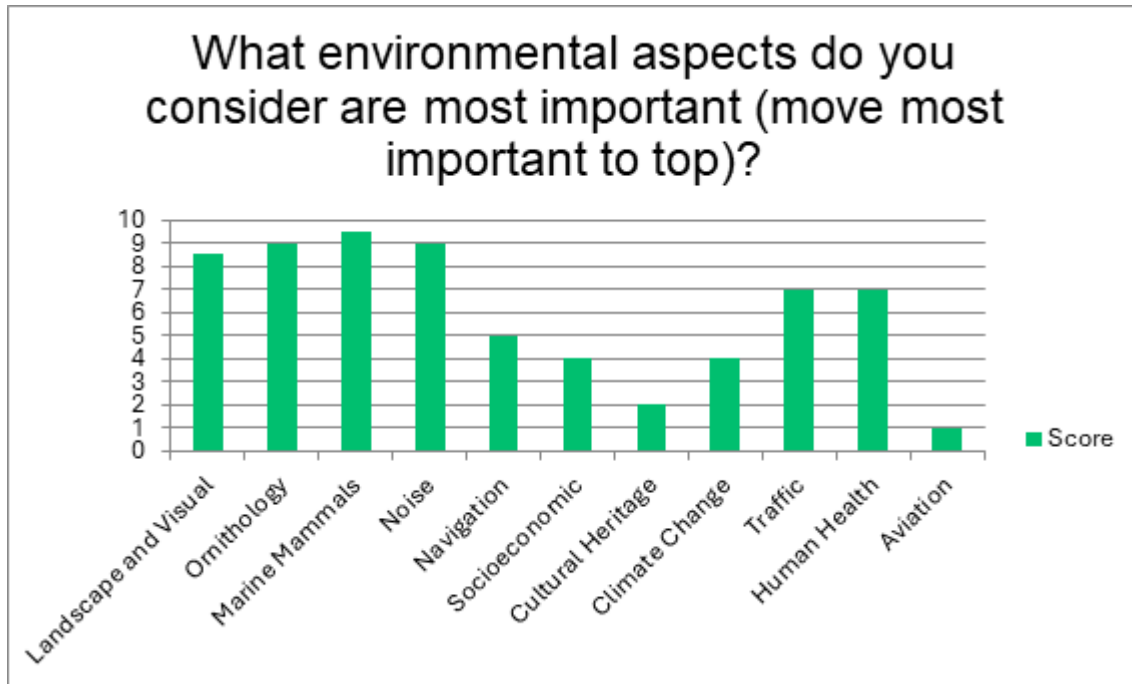
*“Will a business benefit fund with administration support be created?”*

As above, it is projected that the development will generate £34.9M-£84.3M of GVA and £17.6M-£45.3M of income in the Highlands during the construction phase, depending on the final design. During operations, an estimated £30M-£100M net additional GVA is forecast per annum and £11.9M-£47.7M of net additional income per year for the Highland Council Area. Further details are included in Chapter 10: Socio-economics and Human Health, in Volume 2 of the EIAR.

As part of the questionnaire respondents were asked to consider the following questions:

**What environmental aspects do you consider are most important?**

Marine Mammals, Ornithology and Noise were considered the most important elements by respondent the full results are detailed in the graph below:



The three environmental aspects considered most important to questionnaire respondents were:

Marine Mammals;

Ornithology; and

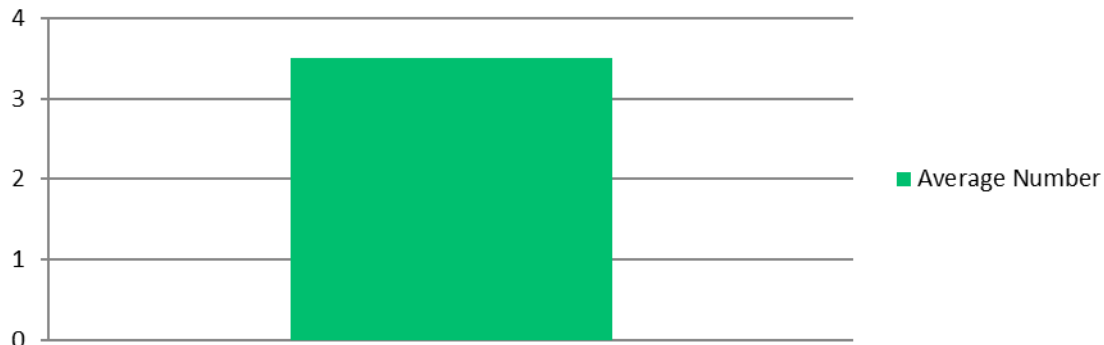
Noise.

These aspects are covered in more detail in the following chapters of the EIAR: Chapter, Chapter 12: Biodiversity, Chapter 13: Ornithology, Chapter 14: Marine Biodiversity, plus associated appendices. The other aspects outlined are included within the remaining chapters of the EIAR.

The majority of the respondents who had attended the public exhibition believed that the Port had provided sufficient information to give them a clear understanding of the proposed development. The graph below is from completed questionnaires.



On a scale of 1 to 5, Do you consider that we have provided sufficient information to give you a clear understanding of the proposed upgrade works (5 is excellent and 1 is very poor)?



## 8.2 Highland Council Input

A series of meetings were held with Anne Cowling the Landscape Officer and Peter Wheelen, the Strategic Projects Team Leader in the Highland Council's Planning and Building Standards team, with regard to the landscape and visual impact assessment. Full details of the exchanges are presented in Chapter 9: Landscape and Visual Impact Assessment of the EIAR.

A meeting was held on 19<sup>th</sup> December 2024 with Robin Fraser, Environmental Health Officer of the Highland Council, to present the approach and initial results of the in-air noise assessment being presented in Chapter 6: In-Air Noise of the EIAR. In general, he was content that the approach was appropriate.

## 8.3 Aviation Consultation

Letters were sent to aviation stakeholders between the 23<sup>rd</sup> October 2024 and the 26<sup>th</sup> November 2024 outlining the project and asking them to identify if they had any specific concerns. An example letter is provided in Appendix 15.8. A Microsoft (MS) Teams meeting was held on the 11<sup>th</sup> December 2024 with HIAL, where it was agreed that indicative project details would be provided to allow them to start the initial safeguarding assessment (see Chapter 16: Aviation of the EIAR for more details).

## 8.4 Ornithological Discussions

Affric Limited ecologists met with NatureScot to discuss their scoping comments on the 11<sup>th</sup> July 2024. The methodology employed for vantage point assessments was presented and discussed. This was followed up in writing, and it was agreed that the methodology was appropriate. A memo was sent to NatureScot from Affric detailing the methodology on the 23<sup>rd</sup> August 2024.

A face to face meeting was held with representatives of the RSPB on the 11<sup>th</sup> November 2024 to discuss their scoping feedback and present our planned approach to addressing their points. A follow-up meeting was then held with RSPB and NatureScot to discuss mitigation, with a particular focus on tern, on MS teams on the 17<sup>th</sup> December. The discussion informed the production of the EIAR and Tern Management Plan (TMP). For further details please see Chapter 13: Ornithology of the EIAR.

## 8.5 Navigation

A meeting with Helen Croxson and Helen Duncan of the MCA clarified their scoping response with regard to the need for a navigation risk assessment.

## 8.6 Technical Discussions and Input

Data has been gathered from prospective Port users over the past four years and has fed into the design of the Phase 5 Development. In April and May 2024, PoCF undertook an additional technical consultation with prospective users of the Phase 5 Development, based on the outline design at that stage. The specific content is commercial in confidence and included conversations with the following:

Offshore wind developers x 8

Fabricators / manufacturers x 5

Operations companies x 2

PoCF pilots x 5

Transport & installation contractors / Vessel owners x 2

Crane operators x 1

# 9 Amendments Made to the Application Resulting from the Pre-Application Consultation

Many of the ideas received through the formal pre-application consultation are already in place or under development. These have primarily been based on feedback from

supply chain companies and prospective Port users which has been gathered over the past four years. For example, the initial designs included a deep pocket of -16m for the proposed integration of floating offshore wind turbines. Stakeholder feedback has suggested that this depth is no longer required and the dredge depth can be reduced to -14m and will accommodate the majority of the floating foundation designs.

The technical consultations with prospective users (customers) have fed directly into the operational scenarios outlined in the EIAR. This has included the Floating Offshore Wind (FLOW) operational scenario, which envisages positions for 3 fully integrated FOWT alongside the quay of the Phase 5 Development. At the outline design stage, it was envisaged that space for two fully integrated FOWT would be sufficient, however stakeholder feedback has confirmed that an additional load-in/sail-away berth would provide greater flexibility in the event of poor weather. This has led to the design of a longer quay and larger laydown area.

Engagement with developers and crane operators informed the design of the heavy lift pad and the weight-bearing capacity of the laydown area. This is based on the requirement to load nacelles and tower sections onto the floating substructures from the quayside, most likely using a ring crane. This feedback has coalesced around a 15 tonne per metre square (t/sqm) load bearing capacity for the land area and 25t/sqm for the heavy lift pad, along with a 70mx70m pad size. (Larger and smaller sizes were considered through the design and consultation process.)

The one recurring theme from the formal pre-application consultation which was raised in particular by local community stakeholders is the requirement to provide employment and opportunities for local residents and contractors. The Port has sought to maximise local jobs and business opportunities from the outset of the project; in fact it is one of the driving forces behind the plans for the Phase 5 Development and the wider Green Freeport bid. For the construction phase, PoCF plans to incorporate the requirement to create employment for local residents within the tender process, as was the case for the Phase 4 Development.

During the operational phase the site is likely to be under long-term lease to a port user / developer. PoCF will raise awareness of the capabilities of the local supply chain and make introductions where relevant (this activity has already begun with prospective tenants). More broadly, the Green Freeport Tax Site Delivery Agreement signed by PoCF includes a Fair Work Charter which is based on the Scottish Government's Fair Work First Guidance and the Fair Work Convention. At the core of this is fairly paid, secure work which aims to balance the rights and responsibilities of workers and employers. As landowners, PoCF has committed to the following obligations and is requested to ensure that end users sign up to the same:

1. Landowners and End Users commit to treating all our workers fairly by providing each worker with fair pay, at a minimum the rate of the Real Living Wage, or the collectively bargained rate where applicable, and by providing each worker with defined, agreed hours with no inappropriate use of zero hours contracts;
2. Landowners and End Users commit to ensuring a voice for our employees and oppose the use of fire and rehire practices. This includes keeping a constructive dialogue between the employer, workers and (where appropriate) a relevant trade union/s to address workplace issues, ensuring fair, transparent and communicative practices, especially if the need to change terms and conditions of employment arises, and by ensuring no 'fire and rehire' practices are utilised;
3. Landowners and End Users commit to respecting their employee's ability to achieve a balance between work and home life that supports their wellbeing, by providing flexible working where possible and ensuring all employees have access to training and development opportunities and create pathways to employment for new employees, including apprentices, young people and those with barriers to employment;
4. Landowners and End Users commit to creating an inclusive and diverse workplace, by creating diversity, equality and inclusion policies and procedures to include recruitment, retention, and upskilling of the workforce, representing all protected characteristics, and by monitoring and, where relevant, reporting on protected characteristics pay gaps within the organisation.

In addition, the Green Freeport established a Skills and Innovation Fund; contributions to which are payable by landholders for each qualifying employee based on National Insurance Contribution Reliefs available within the Green Freeport Tax Sites. The Fund was established to help secure the skilled workforce needed for the expansion of expected activity across the Green Freeport, and to support work-based learning, upskilling and industry-related training associated with activity within the Green Freeport. It can also be used to contribute to the achievement of other Green Freeport objectives which benefit the region.

As discussed in Section 8, feedback from relating to noise, navigation, aviation ornithology and landscape and visual impacts has directly influenced the content of the EIAR.

## 10 Reporting & Recording

### 10.1 Data Collection

Data was collected through a variety of channels including face-to-face feedback, postal and email submissions. It has been recorded in a consistent format to allow comparisons and quantitative summaries to be made.

### 10.2 Stakeholder Database

A stakeholder database has been established to record the contact details of anyone who wished to be kept apprised of the proposal's evolution. This will be maintained and employed in accordance with the Data Protection Act and the General Data Protection Regulation (GDPR). It will solely be used to provide information about the proposed development in accordance with the requests from the specific respondents.

### 10.3 Recording Feedback & Queries

The majority of comments and queries were obtained through the public events and meetings. Paper questionnaires were provided at the formal PAC event, with links and QR codes also available to the online version on the Survey Monkey digital questionnaire platform. Project staff were provided with standardised forms where they could record an outline of any additional discussions held with stakeholders.

### 10.4 Responding to Feedback & Queries

PoCF appointed a point of contact to take responsibility for disseminating received feedback and ensuring that it was responded to accordingly. In addition to personal responses, PoCF utilised existing stakeholder engagement methods (e.g. quarterly meetings, newsletter etc.) to respond to issues raised through the consultation and report back to stakeholders.

## 11 Post Application

### 11.1 On-going Engagement

This document has focused on pre-application stakeholder engagement specific to that required under the Marine Licensing application process and with particular relevance to the Phase 5 Development project.

As a Trust Port however, stakeholder engagement is part of the Port's everyday remit, and a stakeholder engagement plan is followed as part of PoCF's Integrated Management System (IMS). Many of these existing communication methods were employed as part of this consultation and are over and above that required by the legislation. For example:

although consultation with stakeholders becomes the responsibility of statutory bodies after the application is submitted, PoCF will continue to work closely with stakeholders and with Marine Directorate and statutory consultees while the formal application is being considered. This will include updates at quarterly meetings with staff, Port users and the joint community councils and through the Port's quarterly newsletters.

## 12 Project Contact

For more information contact:

Alex Johnson, Marketing & PR Manager 01349 852 308

Port Office, Shore Road, Invergordon, Ross-shire, IV180HD [a.johnson@pocf.co.uk](mailto:a.johnson@pocf.co.uk)

## 13 References

- Data Protection Act (2018)
- General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR)
- The Marine (Scotland) Act 2010. [Marine \(Scotland\) Act 2010](#)
- The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013
- The Marine Works (Environmental Impact Assessment (EIA)) (Scotland) Regulations 2017
- Transport Scotland's Modern Trust Ports for Scotland: Guidance for Good Governance (Scottish Government 2012) [Modern Trust Ports for Scotland: Guidance for Good Governance | Transport Scotland](#)

## 14 Glossary

<b>Acronym</b>	<b>Definition</b>
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
FLOW	Floating Offshore Wind
FTE	Full Time Equivalent
FOWT	Fully Integrated Floating Offshore Wind Turbines
HA	Hectare
HIE	Highlands and Islands Enterprise
IMS	Integrated Management System
ISB	Invergordon Service Base
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate Licensing Operations Team
MHWS	Mean High Water Springs
MP	Member of Parliament
MS	Microsoft
MSP	Member of Scottish Parliament
NLB	Northern Lighthouse Board
PAC	Pre-Application Consultation
PoCF	Port of Cromarty Firth
RSPB	Royal Society for the Protection of Birds
SEPA	Scottish Environment Protection Agency
T/SQM	Tonnes per Square Metre



## 15 Appendices

### 15.1 Public Notice

# publicnotices

**Marine (Scotland) Act 2010  
Marine Licensing (Pre-Application Consultation) (Scotland)  
Regulations 2013**

**PORT OF CROMARTY FIRTH: BERTH DEVELOPMENT,  
INVERGORDON SERVICE BASE  
Pre-Application Consultation Event**


Notice is hereby given that the Cromarty Firth Port Authority (trading as Port of Cromarty Firth), registered at Port Office, Shore Road, Invergordon, Ross-shire, IV18 0HD intends to apply to Scottish Ministers for consent for an extension to the Invergordon Service Base (NH 70416 68315). This will include new berthing and additional laydown space at the western side of the service base.

A Pre-Application Consultation event will be taking place at the Port Office on 29th of October 2024 between 11am and 8pm. This event will provide an opportunity for stakeholders to consider and comment upon the prospective application. In addition, details will be displayed on the Port's website at [www.pocf.co.uk](http://www.pocf.co.uk) after the event.

If you wish to make comments on the developments, please contact the Port of Cromarty Firth at the address above, or by email at [cfpa@cfpa.co.uk](mailto:cfpa@cfpa.co.uk) quoting reference 'Phase 5 development consultation' before 11th November 2024.

Any pre-application comments should be made directly to the Port for their consideration at this stage. Please note, comments made to Port of Cromarty Firth are not representations to Scottish Ministers. Once Marine Licence Applications have been submitted there will be an opportunity for representations to be made to Scottish Ministers on the application.

## 15.2 Example Advert



**Have your say in Port of Cromarty Firth's Phase 5 expansion plans**

As a Trust Port, we serve the best interests of our stakeholders.

We invite you to join our drop-in session, to share your thoughts regarding our Phase 5 expansion plans

**Open Day**  
11am-8pm, 29th October 2024  
Port Office, Shore Road,  
Invergordon, IV18 0HD



## 15.3 PAC Questionnaire Example

# Phase 5 Development Feedback Questionnaire

1. Phase 3 and 4 developments utilised similar construction techniques to those planned for Phase 5. Mitigation to minimise construction impacts on the local community were employed. Based on your experience of the previous construction phases, are there any areas that you are aware of that could be improved upon?

2. How could the Port make the most of the development for the benefit of local people?

3. How could the Port make the most of the development for the benefit of local businesses?

4. Do you have any specific comments or questions regarding the proposed Phase 5 upgrades?

5. What environmental aspects do you consider are most important? (rank the options by numbering them 1 - 10)

Topic	Rank
Ornithology	
Marine Mammals	
Noise Navigation	
Socioeconomic	
Cultural Heritage	
Climate Change	
Traffic	
Human Health	
Aviation	
Landscape and Visual	

6. On a scale of 1 to 5, do you consider that we have provided sufficient information to give you a  clear understanding of the proposed upgrade works (5 is excellent and 1 is very poor)?

7. If you do not believe we have provided sufficient information, please let us know below what further information we could provide going forward.

8. To ensure that we have included as wide a stakeholder group as possible, could you please answer the following questions :

Gender:            Male            Female            Other            Prefer not to say

Age:                <16            17-24            25-39            40-59            >60

Nationality:

Postcode:

Job Status:                      Employed                      Student                      Retired  
   Self-employed                      Other                      Unemployed

Stakeholder Group(s):   Local Community                      Local Business                      Local Authority  
   Port Employee                      Port User                      National Government  
   Other interested group:

9. So that we can keep you informed what is your preferred method of communication for updates do you prefer:

Email

Social media

Website

Events

Newspapers

Other

Would rather not receive any further updates

If you would like the questionnaire to remain anonymous, you do not need to complete the next section. If you would like to be kept informed as the development progresses, please add your preferred contact details here:

Name:

Address:

Email:

Telephone Number:

Return to: Phase 5 Consultation. Port of Cromarty Firth. Port Office, Shore Road, Invergordon. IV18 0HD or by email to [qanda@pocf.co.uk](mailto:qanda@pocf.co.uk)

Return date Monday 11<sup>th</sup> November 2024.

## 15.4 Sample Notification Letter

Name and Address

16/09/2024

Dear XXX,

### **Re: Invergordon Service Base Phase 5 Development**

The Cromarty Firth Port Authority (trading as Port of Cromarty Firth) wish to construct an extension to the Invergordon Service Base (ISB) to provide additional berthing and laydown space at the western side of the ISB.

The proposed works will require a construction and dredge and disposal licence under the Marine (Scotland) Act 2010, (as amended) from the Marine Directorate – Licensing Operations Team. Port of Cromarty Firth intend to submit applications for these consents. Please note that the application will be supported by an Environmental Impact Assessment Report.

Due to the scale of the works, the proposal is subject to a Pre-Application Consultation (PAC), as defined by the Marine Licensing (PAC) (Scotland) Regulations 2013.

Port of Cromarty Firth are committed to ensuring high quality stakeholder engagement is carried out, not only to meet the legislative requirements but to ensure that their neighbours, residents and wider stakeholders have an opportunity to comment on the proposal.

As such, Port of Cromarty Firth will be holding a pre-application consultation event at the Port Office, Shore Road, Invergordon, Ross-shire, IV18 0HD on 29<sup>th</sup> October 2024, drop in from 11am until 8pm.

The event will be an exhibition format, with opportunity for face-to-face discussions with key project members, to provide an opportunity for stakeholders to consider and comment upon the prospective application. Consultation material will be made available after the event on the Port's website at [www.pocf.co.uk](http://www.pocf.co.uk).

If you would like more information, or wish to make representations on the proposed development, please contact: the Port of Cromarty Firth at the address above, or by email at [cfpa@cfpa.co.uk](mailto:cfpa@cfpa.co.uk) quoting reference 'Phase 5 development consultation' before 11<sup>th</sup> November 2024.

Any pre-application comments should be made directly to the Port for their consideration at this stage. Please note, comments made to Port of Cromarty Firth are not representations to Scottish Ministers. Once Marine Licence Applications have been



submitted there will be an opportunity for representations to be made to Scottish Ministers on the application.

If you have any questions, please do not hesitate to contact me.

Kind regards,

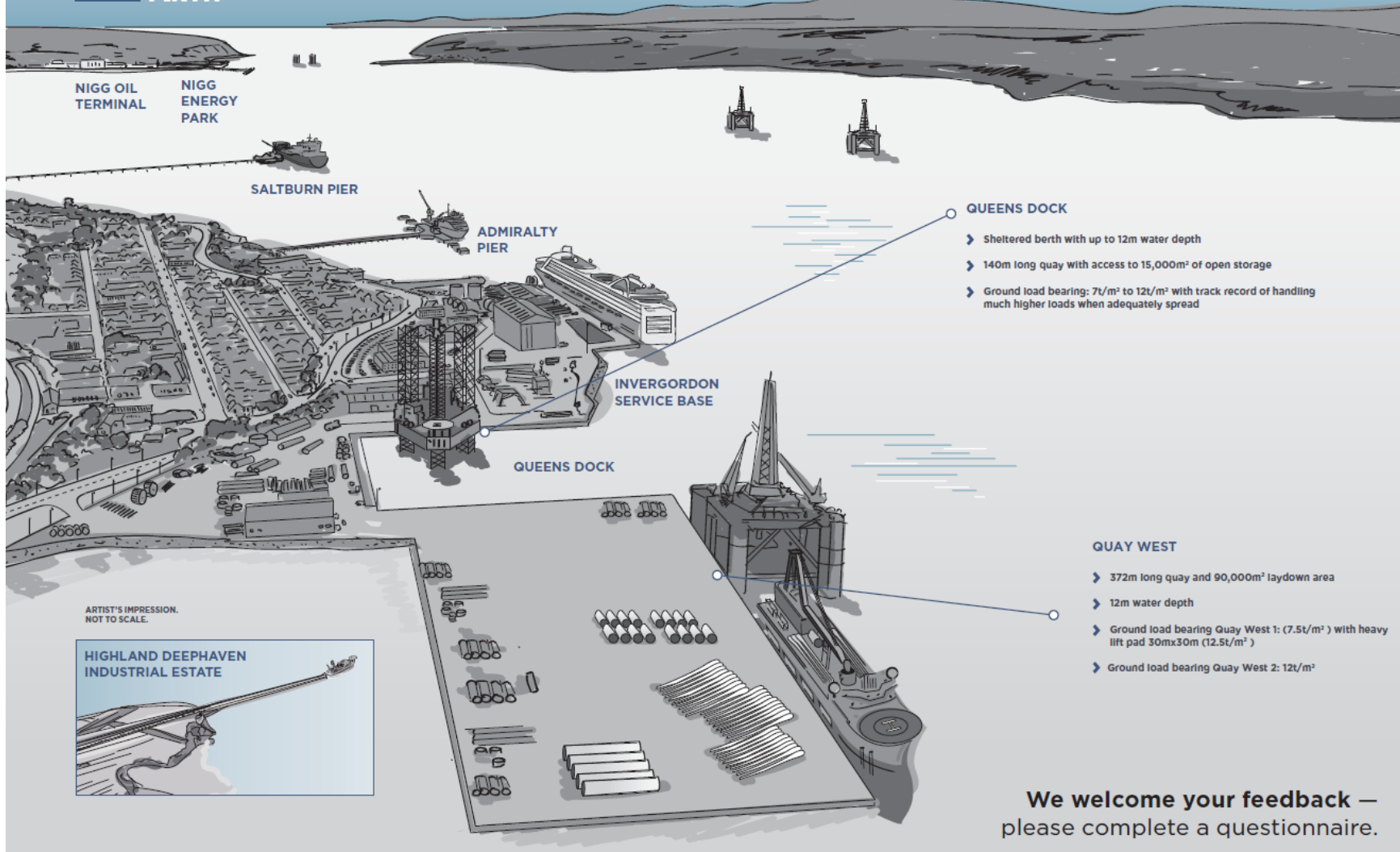
Alex Johnson



## 15.5 Exhibition Board Artwork



Thank you for coming to find out more about our **Phase 5** Development Plans.  
The team is on hand if you have any questions.



ARTIST'S IMPRESSION.  
NOT TO SCALE.

**HIGHLAND DEEPHAVEN  
INDUSTRIAL ESTATE**

**QUEENS DOCK**

- Sheltered berth with up to 12m water depth
- 140m long quay with access to 15,000m<sup>2</sup> of open storage
- Ground load bearing: 7t/m<sup>2</sup> to 12t/m<sup>2</sup> with track record of handling much higher loads when adequately spread

**QUAY WEST**

- 372m long quay and 90,000m<sup>2</sup> laydown area
- 12m water depth
- Ground load bearing Quay West 1: (7.5t/m<sup>2</sup>) with heavy lift pad 30m x 30m (12.5t/m<sup>2</sup>)
- Ground load bearing Quay West 2: 12t/m<sup>2</sup>

**We welcome your feedback —**  
please complete a questionnaire.

## About Port of Cromarty Firth

Established in 1973, Port of Cromarty Firth (PoCF) is a Trust Port. It has no shareholders and 100% of its profits are reinvested in the Port, for the benefit of its stakeholders. Stakeholders include the local community, Port users, employees, local and regional businesses, and local and national government.

PoCF's mission is to act as a key economic enabler in the region (already generating £275 million annually for the Highland economy) and supporting high value, exciting and diverse employment opportunities in the area.

In addition, as a harbour authority, PoCF has the responsibility for safe navigation, and safeguarding of the environment in the Cromarty Firth.

For over 50 years the Port has successfully maintained the delicate balance between generating economic activity and safeguarding the waters over which we are guardians.

## ➤ Drivers for Phase 5

### ◊ Government Net Zero Ambition

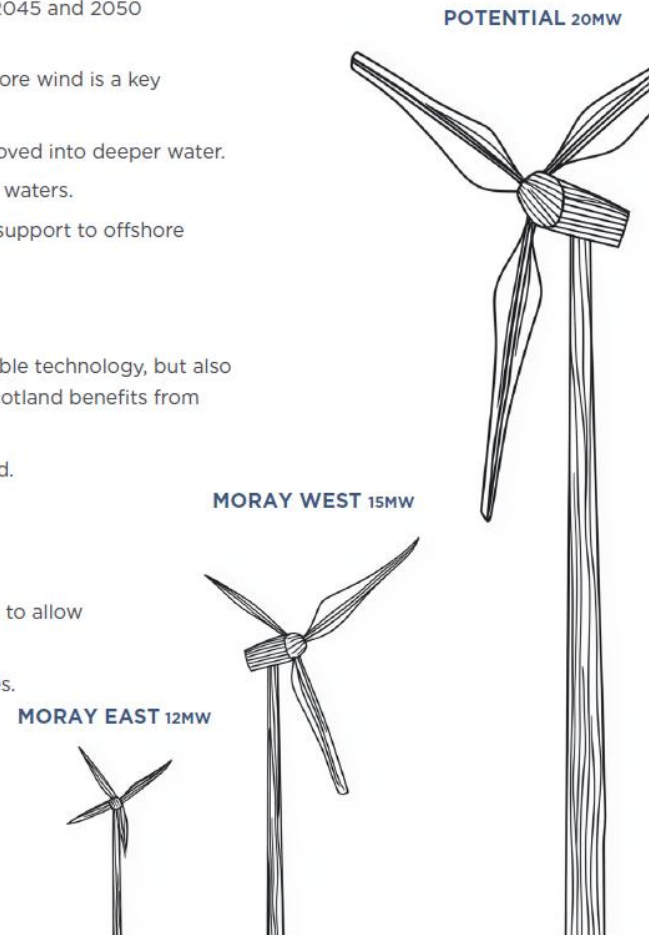
- The UK and Scottish Governments have set the goal of achieving Net Zero by 2045 and 2050 respectively.
- To meet Net Zero there is a heavy reliance on renewable energy, of which offshore wind is a key component.
- In the last decade offshore wind turbines have steadily increased in size and moved into deeper water.
- The development of floating turbines facilitates the harnessing of wind in deep waters.
- Larger port facilities are required for construction, installation and operational support to offshore windfarms, hence they have become critical to achieving the Net Zero goal.

### ◊ Port Requirements

- The Scottish Government has set targets not only for the installation of renewable technology, but also the incorporation of 'Local Content' in offshore wind farm projects, ensuring Scotland benefits from both the clean energy and economic development.
- Appropriate port infrastructure is essential to allow this aspiration to be realised.

### ◊ Floating wind technology requires ports to have:

- Deep sheltered waters for floating technology.
- Quays for offloading components, assembling turbines onto floating bases and to allow pre-commissioning to be completed.
- Large areas of laydown to facilitate the assembly and pre-commissioning stages.
- Heavy lift and load capabilities to move and store components.
- Preference for a roll-on, roll-off facility for ease of component delivery.
- Good access throughout working areas.



# The Proposed Port Development

## Quay West Extension

Extension to Quay West berth of up to 450m

## Lighting

High mast lighting towers with multiple luminaires on each tower shall be installed. The lights will be controlled such that the number of active luminaires can be restricted, with the aim of minimising light pollution and energy usage while maintaining safe illumination for the tasks in progress.

## Surfacing

The Phase 5 laydown area will be finished with crushed stone, and be able to bear loads of 15 tonnes per metre squared.

## Land Reclamation

The land reclamation will provide 11 hectares of additional laydown. Providing a maximum combined laydown area for Phases 2-5 of over 23 hectare.

## Bollards

Mooring bollards will be installed along the quay cope beam to aid the restraint of vessels berthed at the quay. The numbers, rating and location will be appropriate for the size of vessels visiting the facility.

## Dredging

The berth and associated navigational areas will be dredged to provide an operational berth depth of -14m Chart Datum. To ensure stability of adjacent bed materials, appropriately designed dredge slopes could be utilised to merge the dredge pocket into the surrounding seabed.

## Fendering

Fenders will be installed along the length of the old and new berths. This will give us plenty of flexibility and allow us to berth vessels or floating turbines.

## Heavy Load Pad

A 70 x 70 metre concrete heavy load pad able to take between 25-30t/m<sup>2</sup> supported by piles will allow a large crane to be installed.

## Queens Dock West Quay

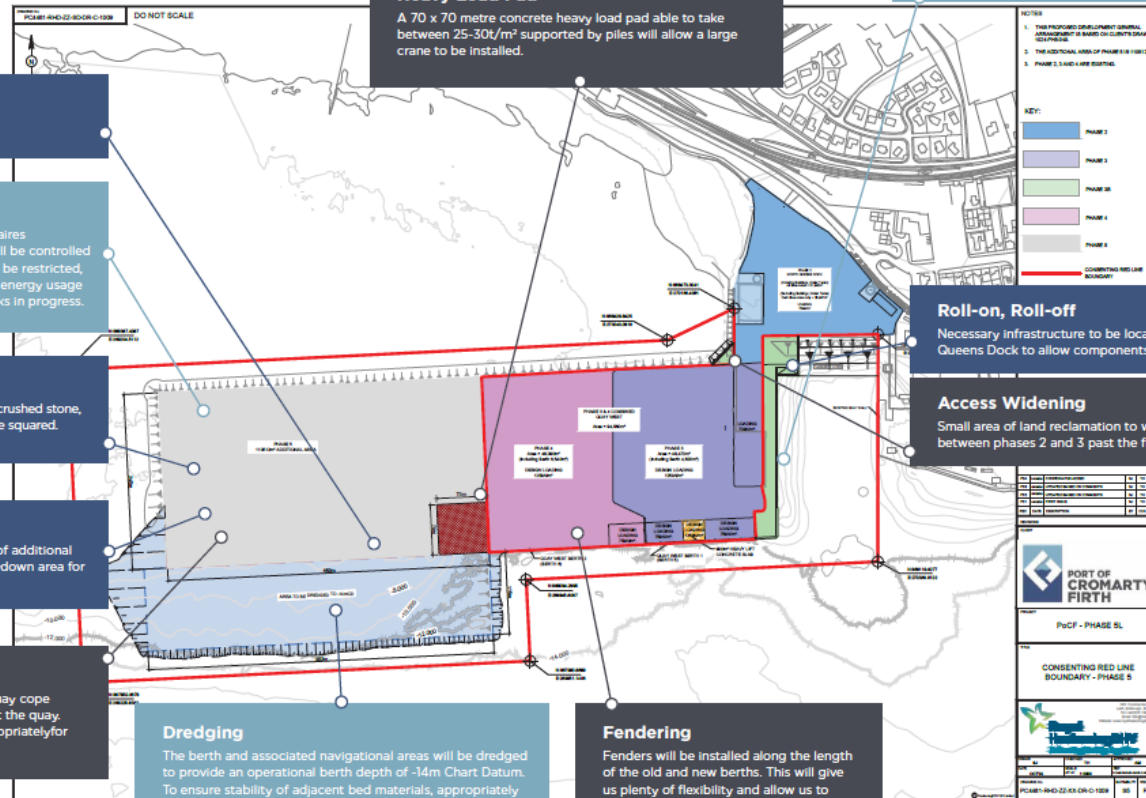
An option to install a quay on the western edge of the Queens Dock is incorporated into the design to allow wind turbine component delivery vessels to berth and unload, without interrupting the wind turbine assembly and pre-commissioning works.

## Roll-on, Roll-off

Necessary infrastructure to be located at the north of the Queens Dock to allow components to be driven off vessels.

## Access Widening

Small area of land reclamation to widen the access route between phases 2 and 3 past the fishmeal shed.



## ➤ How We Will Build It



### REVETMENT

The revetment footprint will be dredged to facilitate the formation of a stable revetment structure and in the placement of competent material. The revetment will be constructed by placing various grades of rock onto the seabed within the dredged footprint. It is likely that the rock will be delivered by road and sea.

If deliveries are made by road they will be from the A9 west of Invergordon and will utilise the West Gate to avoid the need for vehicles to drive through the town.



### QUAY WALL PILING

The quay wall will be of combi-wall formation and comprise tubular piles with infill sheet pile sections between the tubular sections. A second row of tubular piles will be installed behind the quay wall and within the reclaimed area for the purposes of forming the buried anchorage system. The piles will be installed either from the sea or through the land bund. Due to the geology of the seabed it is assumed that both percussion and impact piling techniques will be required to install the piles. This will be taken account of in the assessment of in-air and underwater noise impacts.

Piles will be delivered by sea to an existing berth.



### DREDGING

Material will be dredged using both trailer suction and back hoe dredge techniques. With material removed disposed of to the Sutors dredge deposit site.



### INFILLING

Infill material will be delivered by sea and placed within the area formed by the revetment and quay wall. Areas may be surcharged (overfilled) so that the weight of the material squeezes out water and compacts the material to minimise settlement during operations.



### ROCK ARMOUR REMOVAL

The existing rock armour on the west side of Phase 4 will be removed to allow a seamless join between the two phases. The rock will be reutilised in the Phase 5 revetment.

# ➤ Environmental Considerations

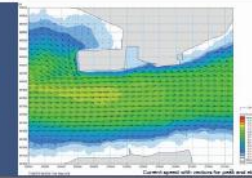
## BIRD SURVEYS

Breeding and winter bird surveys around the Phase 5 development and shoreline up to the Invergordon boating club have been carried out. Vantage Point (VP) surveys were conducted from King Edward Drive and at the Queens Dock area within the Port boundary to understand birds' flight patterns in the area. The survey results are informing the ornithological impact assessment.



## COASTAL PROCESSES

To understand the effect the new structure will have on the shoreline, coastal process modelling is being carried out. As the shore is designated for wintering birds, it is important to ensure this habitat is not affected.



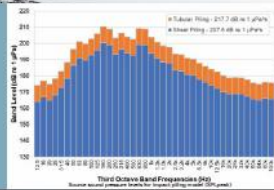
## TERN MANAGEMENT PLAN

This is being developed for all PoCF operations to safeguard both common and Arctic tern which utilise Invergordon Service Base for breeding activities, while ensuring worker safety. This will be a live document updated to take into account learning.



## UNDERWATER NOISE

Modelling is being carried out to provide information on noise levels associated with piling and how it travels through the Firth. This will inform the assessment of impacts on marine mammals.



## MARINE MAMMALS

Porpoise, seals and dolphins regularly utilise the Cromarty Firth. The effects of construction noise, water quality and vessel movements are being assessed. Data collected during previous construction works in the Firth are being utilised to inform this. A marine mammal protection plan will be in place for construction works.



# Environmental Considerations

## CLIMATE CHANGE

Greenhouse gas emissions associated with the full lifecycle of Phase 5 are being considered by undertaking carbon calculations.



## AVIATION

Discussions are planned to agree protocols for informing aviation authorities of when large structures will be in the port area.

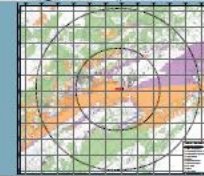
## ARCHAEOLOGY AND CULTURAL HERITAGE

Assessments have been undertaken to demonstrate that the potential effects on setting of features such as the Thieves Stone and Rosskeen church are non-significant. Protocols will be in place during construction in case any previous unknown artifacts are discovered.



## LANDSCAPE AND VISUAL

Impacts on the landscape are being considered of the operational activities. Photomontages and 3D modelling is being undertaken.



## TRAFFIC

A traffic assessment is being conducted, however, effects are expected to be similar to those associated with the construction of Phase 4, as the majority of materials will be delivered by sea.



## NOISE ASSESSMENT

Noise monitoring has been completed to understand the baseline noise levels in Invergordon and Balblair. Noise levels associated with construction and operational plant and vessels are being utilised to predict noise levels at local receptors.

## Have Your Say

### YOUR INPUT

We value your feedback on the proposed development.

### HOW TO PROVIDE FEEDBACK

Please complete a questionnaire to give us your views. You can complete this at the exhibition, scan the QR code or link to it from the Port of Cromarty Firth website. Please return your comments to the Port before 11th November 2024.

Your feedback will be taken account as far as practicable in the development of proposals.

Please note, comments made to PoCF are not representations to Scottish Ministers. Once Marine Licence Applications have been submitted there will be an opportunity for representations to be made to Marine Directorate (on behalf of Scottish Ministers) on the application.

### WHAT HAPPENS NEXT?

The Port will apply to the Marine Directorate for a Marine Licence in January 2025. This is the equivalent of planning permission, but for water-based developments. The application will be supported by an Environmental Impact Assessment Report, which will be made publicly available. The Marine Directorate will then undertake their own consultation on the plans. This will include seeking opinions from statutory stakeholders including Scottish Environment Protection Agency (SEPA), NatureScot, The Highland Council, Northern Lighthouse Board, the Maritime and Coastguard Agency (MCA). You can also provide comments at that stage.

WHERE VISION CREATES GROWTH



### THANK YOU

Thank you for taking the time to visit and for showing an interest in your Port.

### STAY IN TOUCH

The Port has a quarterly community newsletter which keeps people informed about developments and activities at the Port. To receive your personal copy, please email [cfpa@cfpa.co.uk](mailto:cfpa@cfpa.co.uk)





## 15.6 Phase 5 Questionnaire Responses

# Phase 5 Questionnaire Responses

Do you have any specific comments or questions regarding the proposed Phase 5 upgrades?

Open-Ended Response

No

Make noise reduction a priority

How could the Port make the most of the development for the benefit of local people?

Open-Ended Response

Provide local jobs

Community benefit funds and administration support

How could the Port make the most of the development for the benefit of local businesses?

Open-Ended Response

Tender locally

Business benefit funds and administration support

Phase 3 and 4 developments utilised similar construction techniques to those planned for Phase 5. Mitigation to minimise construction impacts on the local community were employed. Based on your experience of the previous construction phases, are there any areas that you are aware of that could be improved upon?

Open-Ended Response

No

To which stakeholder group do you belong? (tick all that apply)

Local  
Community

Local  
Community

Local  
Community

On a scale of 1 to 5, Do you consider that we have provided sufficient information to give you a clear understanding of the proposed upgrade works (5 is excellent and 1 is very poor)?

Open-Ended Response

5

3

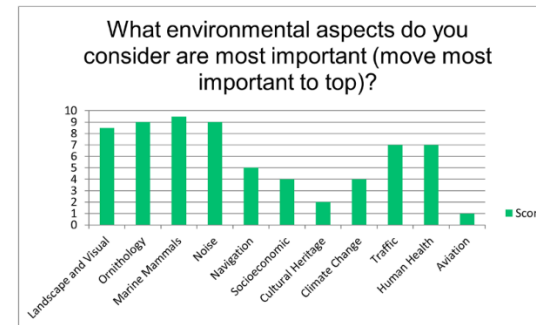
2

If you do not believe we have provided sufficient information, please let us know below what further information we could provide going forward

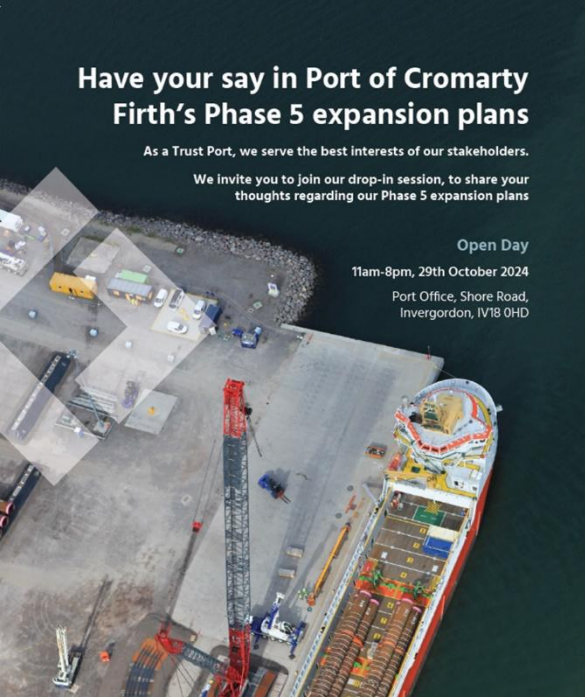
Open-Ended Response

N/A

Printed visual info for collection



## 15.7 Leaflet Drop Collateral

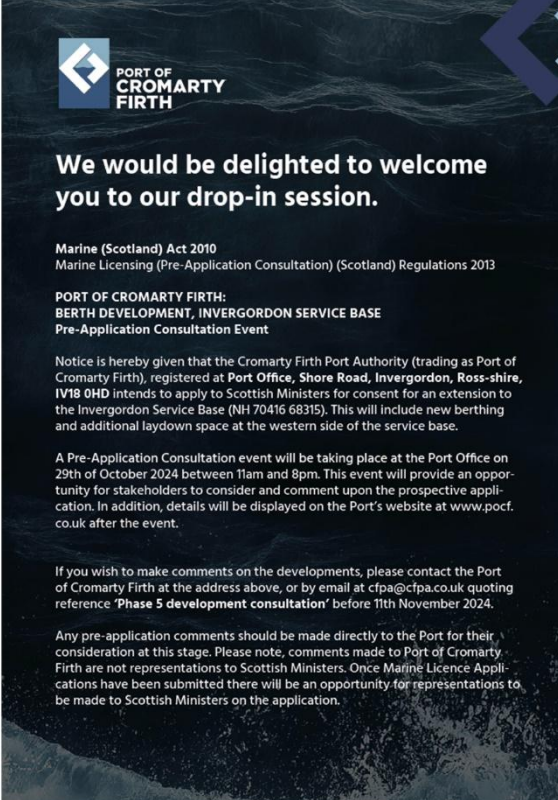



**Have your say in Port of Cromarty Firth's Phase 5 expansion plans**

As a Trust Port, we serve the best interests of our stakeholders.

We invite you to join our drop-in session, to share your thoughts regarding our Phase 5 expansion plans

**Open Day**  
11am-8pm, 29th October 2024  
Port Office, Shore Road,  
Invergordon, IV18 0HD



**PORT OF  
CROMARTY  
FIRTH**

**We would be delighted to welcome you to our drop-in session.**

**Marine (Scotland) Act 2010**  
Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013

**PORT OF CROMARTY FIRTH:  
BERTH DEVELOPMENT, INVERGORDON SERVICE BASE  
Pre-Application Consultation Event**

Notice is hereby given that the Cromarty Firth Port Authority (trading as Port of Cromarty Firth), registered at **Port Office, Shore Road, Invergordon, Ross-shire, IV18 0HD** intends to apply to Scottish Ministers for consent for an extension to the Invergordon Service Base (NH 70416 68315). This will include new berthing and additional laydown space at the western side of the service base.

A Pre-Application Consultation event will be taking place at the Port Office on 29th of October 2024 between 11am and 8pm. This event will provide an opportunity for stakeholders to consider and comment upon the prospective application. In addition, details will be displayed on the Port's website at [www.pocf.co.uk](http://www.pocf.co.uk) after the event.

If you wish to make comments on the developments, please contact the Port of Cromarty Firth at the address above, or by email at [cfpa@cfpa.co.uk](mailto:cfpa@cfpa.co.uk) quoting reference 'Phase 5 development consultation' before 11th November 2024.

Any pre-application comments should be made directly to the Port for their consideration at this stage. Please note, comments made to Port of Cromarty Firth are not representations to Scottish Ministers. Once Marine Licence Applications have been submitted there will be an opportunity for representations to be made to Scottish Ministers on the application.



## 15.8 Aviation Stakeholder Letter Example



Chief Pilot  
Bristow  
HM Coastguard SAR  
Inverness  
IV2 7JB

Ref: 71\_LET\_07  
25<sup>th</sup> November 2024

Dear Sir,

**Subject: Port of Cromarty Firth Phase 5 Development**

Affric Limited are working with the Port of Cromarty Firth (PoCF) on their fifth phase of development of the Invergordon Service Base. As part of the Environmental Impact Assessment (EIA) process being undertaken to support the marine construction licence application, we need to consider the effects on aviation from potential future uses. Hence, I am seeking input with regard to potential impacts on Bristow's operations specifically those associated with Search and Rescue Helicopters operating out of Dalcross (and any other relevant activities). To ensure that operations will not cause a significant effect to aviation, and that the appropriate mechanisms are in place for future communications. I have sent a similar letter directly to the MCA, but would appreciate your local input.

PoCF wish to expand their existing facilities to allow them to accommodate floating offshore wind projects. This may include the assembly, pre-commissioning, maintenance and decommissioning of turbines. The Phase 5 proposals include a land reclamation and creation of additional berthing to the west of the existing Quay West (Phases 3 and 4), providing a continuous quay which could accommodate two or three floating offshore wind turbines. I have provided Drawing PC4461-RHD\_SD-XX-DR-C-1009 for illustrative purposes. Note the project is still under development and hence, could still be subject to change.

The Phase 5 expansion requires a construction licence under the Marine (Scotland) Act 2010 as amended; this does not give permission for operational activities. However, due to the scale of the plans there is a need to complete an EIA under the Marine Works (EIA) (Scotland) Regulations 2017 as amended. EIAs have to consider all stages of a development's lifecycle hence, there is a need to consider the operational impacts of the development on aviation. PoCF are not a windfarm developer, rather they provide facilities which others lease for their own operations. As such it was proposed at the EIA Scoping stage that:

*'A route map to be utilised by offshore windfarm developers planning on utilising the port will be developed to facilitate compliance with the appropriate legislation, guidance and requirements to ensure stakeholder acceptability and if necessary, agreement for specific planned activities.'*

The likely scale and type of activities to be undertaken within the Cromarty Firth are laid out overleaf, to provide you with an understanding of potential operations.



Wind turbine technology continues to evolve hence, for the purpose of the EIA it has been assumed that 20MW turbines with a tip height of 330m are likely to be marketed in the coming years and could be accommodated by Phases 3, 4 and 5. A maximum of three floating turbines could be berthed alongside the quays, during assembly it is unlikely that all three turbines would be at full height. The crane we are using for assessment purposes is the Mammoet PTC 210-DS, some information on which has been provided with this letter. I am keen to discuss whether the turbine assembly operations including use of the crane, would cause any concerns with regard to your operations.

Once assembled turbines will be free to yaw and turn, however, the blades will be feathered such that rotational speeds will be less than 1 rotation per minute (RPM). When the scoping report was drafted it was assumed that some pre-commissioning and initial testing activities would require the rotor to rotate up to 7RPM for 4 to 6 hours, with occasional short overspeed tests increasing the rotational speed up to 12RPM for a maximum of 1 minute. Only one turbine would be tested at a time, and assuming there are no issues each turbine will be tested on one occasion. No more than two turbines are likely to be tested in any one day (8-12hours of testing), and testing is unlikely to take place for more than two consecutive days. The number of hours of testing required would be determined by the throughput of the assembly line. Initially it may take a few weeks for each floating turbine to be fully assembled, but as the process matures, it is envisaged that a turbine could be assembled within a week. As deployment to windfarm sites will be weather dependant, it is presumed full assembly will avoid the winter months, although preparatory works will be completed year-round. Hence, it is predicted that in the region of 25 to 40 turbines could be assembled per year, so there will be between 20 and 40 days a year in which turbines could be turning at greater the 1RPM.

It is now thought unlikely that initial testing requiring the blades to turn at greater than 1 RPM will be completed in port due to the lack of grid connectivity. We have been in touch with Highlands and Islands Airports Ltd (HIAL) as we are aware that they operate Radars which may be affected by wind turbines. Their Safeguarding Team will be reviewing the specifics in due course. However, I'm keen to understand if there are any other implications for yourselves, recognising that Helicopters fly at lower heights than fixed wing aircraft, and may put down in a variety of locations.

Once turbines are assembled, they will be towed out through the Cromarty Firth into the Moray Firth to their windfarm location. Similar turbines being brought to shore for maintenance could be towed through the Moray and Cromarty Firths.

It is proposed that Notices to Aviation (NOTAM) be utilised to ensure up to date information is provided to the aviation sector regarding the location and potential movements of wind turbines associate with operations undertaken within the Cromarty Firth. Can you please confirm if this would be sufficient for yourselves or whether you have any additional requirements or issues we need to take into consideration.



If you would like to meet to discuss the proposals further, then please suggest a date at your earliest convenience suitable for yourself then we can make the appropriate arrangements, and if you require any additional information please get in touch.

Kind regards,



Fiona Henderson  
Managing Director  
Affric Limited

