

In response to scoping question 8.2.9. (Page 155 of the scoping document) - Are you satisfied with the receptors and potential impact proposed to be included within the impact assessment (i.e. impact of construction noise on hearing specialist)? Are you satisfied that this sufficiently covers the potential impacts on features from the proposed development?

Scottish ministers noted that two potential impacts require further consideration:

1. *Impact of suspended sediment and smothering on scallops and Nephrops (including different life stages); and*  
2) *Particle motion.*

Regarding the *Impact of suspended sediment and smothering on scallops and nephrops*, it is noted that this study is only required if gravity bases are to be used, as the use of gravity base structures would require significant dredging operations and lead to increased suspended solids and increased smothering impacts. It is also noted that these could be used to provide a comparison with the spatial extent of the scallop and nephrops fishery, identified from commercial fisheries data, to allow an understanding of the spatial extent of effects, if any, to scallops and nephrops and provide a context within which to consider them.

From the work undertaken to date, while scallop fishing is known to occur on the wind farm site, the vast majority of nephrops fishing occurred on the cable route and not at the wind farm site. This is reflective of the seabed conditions in the two areas; seabed of the offshore wind farm site is made up of coarser more mixed sediment which support scallops; whereas cable route is made up muddier sediments which supports nephrops.

As this suspended sediment study is only required if gravity bases as to be installed, we just wanted to double check that due to the fact that nephrops are predominantly limited to the cable corridor (which will not be impacted either way by the dredging at turbines for gravity bases) we will therefore not need to include nephrops in the assessment ?

We would appreciate confirmation from you that you would be agreement to this?

Many thanks and please let me know if you require any further information.

Many thanks  
[Redacted]

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[Redacted]

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**From:** [Redacted]  
**Sent:** 10 August 2017 14:26  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Inch Cape Offshore Windfarm Revised Design Scoping Opinion ADDENDUM - Ornithology - 10 August 2017  
**Attachments:** Inch Cape Offshore Windfarm Revised Design Scoping Opinion ADDENDUM - Ornithology - 10 August 2017.pdf

Dear Sir/Madam,

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)**

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (AS AMENDED)**

**ADDENDUM (ORNITHOLOGY) TO THE SCOPING OPINION FOR THE PROPOSED SECTION 36 CONSENT AND ASSOCIATED MARINE LICENCE APPLICATION(S) FOR INCH CAPE OFFSHORE WIND FARM AND ASSOCIATED OFFSHORE TRANSMISSION WORKS, OFF THE ANGUS COASTLINE**

Thank you for your correspondence of 28<sup>th</sup> April 2017 requesting a scoping opinion for the proposed Inch Cape Offshore Wind Farm (Revised Design).

I attach the addendum to the response to your request made under Regulation 7 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (as amended) and Regulation 13 and Schedule 4 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) to the Scottish Ministers for a scoping opinion on the proposed Inch Cape Offshore Windfarm (revised design). Please note, this addendum covers only the aspects relating to Ornithology. The Scoping Opinion issued on 28<sup>th</sup> July 2017 covers all other receptors other than marine mammals. A separate addendum to cover Marine Mammals was issued on Thursday, 3<sup>rd</sup> August 2017.

The Scottish Ministers have consulted with the appropriate bodies and other persons who were likely to be concerned by the proposed development by reasons of their environmental responsibilities. Having regard to the responses received from all parties, please find enclosed an addendum to the Scottish Minister's Scoping Opinion issued on 28<sup>th</sup> July 2017.

Regulation 10 (1) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (as amended) requires that a copy of this response is sent to the planning authority (or authorities) within whose area the land which is the subject of the proposed application is situated (or, in relation to a proposed development in, on, over or under the sea, such planning authority or planning authorities as the Scottish Ministers consider appropriate). For the purposes of this request, a copy of this response has been sent to Angus Council, Dundee City Council, East Lothian Council, Fife Council and Scottish Borders Council.

Angus Council, Dundee City Council, East Lothian Council, Fife Council and Scottish Borders Council shall take steps to ensure that this document is made available for public inspection at all reasonable hours at the place where its Register is kept. If an application is subsequently made, the opinion and related documents should be transferred to Part 1 of the Register together with the application.

You should note that this opinion is based on information available to the Scottish Ministers as of 10<sup>th</sup> August 2017. You should have regard to subsequent proposals which are submitted to Planning Authorities or the Scottish Ministers prior to the determination of any future application. To this end, we would encourage you to approach the

Planning Authorities and the Scottish Ministers at the point of application to ascertain whether further proposals have come forward which may have a bearing on the information you have been asked to provide.

If you have any queries please do not hesitate to contact us.

Yours sincerely

[Redacted]

**marinescotland**

Marine Scotland Licensing Operations Team

Scottish Government

Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

Phone:[Redacted]

/ MS.MarineRenewables@gov.scot

<http://www.gov.scot/Topics/marine/Licensing/marine>

[Redacted]

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**From:** [Redacted]  
**Sent:** 10 August 2017 08:21  
**To:** [Redacted]  
**Cc:** [Redacted]  
(MARLAB)  
**Subject:** RE: Inch Cape- Nephrops and sedimentation

Good morning [Redacted]

Hope you had reasonable weather when you were out at sea, and it wasn't too choppy!

Thanks for your reply and agreeing to the approach. We've sent a few queries to the SFF, one of which covers nephrops smothering as they were also wanting to see it assessed in the EIA. Once we receive receipt of their position I will send on to [Redacted] so we can hopefully get MS-LOT's confirmation on the agreed approach.

Many thanks, and if we have any further queries I'll make sure to include MS-LOT. Likewise please just give us a shout if you need anymore information.

Kind regards,

[Redacted]

**From:** [Redacted]  
**Sent:** 09 August 2017 16:14  
**To:** [Redacted]  
**Cc:** [Redacted]

**Subject:** RE: Inch Cape- Nephrops and sedimentation

Hi [Redacted]

All is well here; I've just completed a couple of cruises at sea, so I'm glad to be back in the office for a while.

Thanks for your e-mail – just a gentle reminder that e-mails relating to queries on advice provided to MS-LOT by MSS should go through MS-LOT. This helps to maintain an audit trail in the decision making process. As such, I've copied Sophie and Tracey into my response.

I find that your suggested approach is reasonable, and I can confirm that I would be in agreement with it. I would suggest that evidence used to support not including nephrops within the assessment should be presented within the EIA report.

I hope this is helpful – please feel free to 'reply all' should you need any clarification.

Thanks,

[Redacted]

**marinescotland**

[Redacted]  
Marine Scotland Science  
Scottish Government

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**From:** [Redacted]  
**Sent:** 09 August 2017 15:01  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Inch Cape- Nephrops and sedimentation

Hi [Redacted]

Hope all's well!

We've received and reviewed the Scoping Opinion from MS-LOT in regards to Inch Cape Wind Farm, thank you for your response that has helped inform MS LOTs opinion.

In reviewing the responses we have one clarification that we wanted to run past you just so we are all aligned on what we intend to assess within the EIA.

In response to scoping question 8.2.9. (Page 155 of the scoping document) - Are you satisfied with the receptors and potential impact proposed to be included within the impact assessment (i.e. impact of construction noise on hearing specialist)? Are you satisfied that this sufficiently covers the potential impacts on features from the proposed development?

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1. *Impact of suspended sediment and smothering on scallops and Nephrops (including different life stages); and*
- 2) *Particle motion.*

Regarding the *Impact of suspended sediment and smothering on scallops and nephrops*, it is noted that this study is only required if gravity bases are to be used, as the use of gravity base structures would require significant dredging operations and lead to increased suspended solids and increased smothering impacts. It is also noted that these could be used to provide a comparison with the spatial extent of the scallop and nephrops fishery, identified from commercial fisheries data, to allow an understanding of the spatial extent of effects, if any, to scallops and nephrops and provide a context within which to consider them.

From the work undertaken to date, while scallop fishing is known to occur on the wind farm site, the vast majority of nephrops fishing occurred on the cable route and not at the wind farm site. This is reflective of the seabed conditions in the two areas; seabed of the offshore wind farm site is made up of courser more mixed sediment which support scallops; whereas cable route is made up muddier sediments which supports nephrops.

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Many thanks and please let me know if you require any further information.

Many thanks  
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Planning Authorities and the Scottish Ministers at the point of application to ascertain whether further proposals have come forward which may have a bearing on the information you have been asked to provide.

If you have any queries please do not hesitate to contact us.

Yours sincerely

[Redacted]

**marinescotland**

Marine Scotland Licensing Operations Team

Scottish Government

Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

Phone:[Redacted]

MS.MarineRenewables@gov.scot

<http://www.gov.scot/Topics/marine/Licensing/marine>

[Redacted]

Scottish Government  
Marine Laboratory, PO Box 101  
375 Victoria Road  
Aberdeen  
AB11 9DB

29 August 2017

Dear [Redacted]

**Clarifications on The Addendum (Ornithology) to the Scoping Opinion for the Proposed Section 36 Consent and Associated Marine Licence Application(s) for Inch Cape Wind Farm and Associated Offshore Transmission Works.**

As briefly discussed [Redacted] on 23<sup>rd</sup> August 2017, Inch Cape Offshore Limited (ICOL) have now undertaken a detailed review of the ornithology addendum to the Scoping Opinion for the proposed Section 36 consent and associated Marine Licence application(s) for the Inch Cape Wind Farm and associated offshore transmission works. Whilst we appreciate the level of effort that has gone into Marine Scotland Licensing and Operation Teams (MS-LOT's) Scoping Opinion in regards to ornithology there are several points that we would like to have clarified. We are also concerned that there are elements of the Scoping Opinion that we feel are disproportionate to the level of detail required, and therefore not reflective of the 2017 Environmental Impact Assessment (EIA) regulations and guidance where there is a much greater emphasis on proportionality and more streamlined procedures. We were slightly surprised at some of these requests, especially in light of the detailed Scoping Meetings that were held, where it appeared that the Scottish Government, their statutory advisors and key stakeholders appeared to be championing the proposed process for a focussed and streamlined EIA.

We would be grateful for a quick response on the queries below to allow us to progress with the ornithology assessment and meet our planned submission deadline.

- 1. Cumulative Impact Assessment for kittiwake and gannet:** Please clarify which other offshore wind farm sites should be included in the cumulative impact assessment (CIA) for collisions to kittiwake and gannet during the non-breeding season. In response to the Scoping Report question 8.4.9 (and in relation to Population Viability Analysis (PVAs) – see Scoping Report paragraph 5.8.2), the Scoping Opinion states on pg12 that “UK” sites should be included but for the species in question the current practice as applied to other UK North Sea wind farms (e.g. East Anglia THREE and Hornsea P2 applications) is for the CIA to be limited to sites within the UK waters of the North Sea. Can Marine Scotland confirm that the list of offshore wind farm sites included in Appendix A are those which should be included in the CIA for collisions to kittiwake and gannet during the non-breeding season?
- 2. Stochastic collision risk model and application timescales:** Due to the schedule for submission (with Gatechecking likely in Q1 2018) it will be necessary to complete the impact assessment before the stochastic collision risk model (CRM) becomes available. This is on the basis that in



response to the Scoping Report question 8.4.9, the Scoping Opinion states on pg 14 that the stochastic CRM is not due until December. Thus, the Band (2012) CRM will be used to estimate the collision impacts and, where required, to inform the PVA's. Since the PVA's will need to be completed early to mid autumn (which is well before the stochastic CRM is available), they cannot be informed by this model. We assume that this is acceptable, since it is not possible for the stochastic CRM to inform the PVA, without significant delay to the planned submission. Can Marine Scotland confirm that we will not be required to use the stochastic CRM? In this regard, we would also like to ask whether this would be the type of change that the Scottish Ministers would require updating in line with Multi-stage Regulatory Consents, or whether, upon receiving consent, the modelling undertaken at the time of submission would be deemed acceptable?

3. **CRM options for use with herring gull:** It is unclear from the Scoping Opinion why collision estimates derived from Option 3 of the CRM are being recommended for herring gull, but that any subsequent PVA for herring gull should use the outputs from Option 2 of the CRM (see Scoping Opinion paragraph 5.7.6). It is clear that Option 3 represents the best available scientific method for estimating collisions, as it makes the correct calculation of collision probability before applying an avoidance rate. It is also clear that since there is an available avoidance rate for Option 3 for herring gull from the Marine Scotland report<sup>1,2</sup>, that the best available science is to use the Option 3 outputs to inform any PVAs that may be required for herring gull. In addition, a PVA for herring gull is not necessarily required if the predicted impacts are sufficiently low (as indicated in Scoping Opinion paragraph 5.8.1). Therefore, can Marine Scotland confirm that if a PVA for herring gull is required, then Option 3 should be used?
4. **Approaches to estimating impacts from displacement and barrier effects:** The ICOL Scoping Report suggested that consideration should be given to using the existing CEH displacement model<sup>3</sup> for the purposes of informing the assessment, at which time ICOL was unaware of the ongoing work being undertaken to develop the SeabORD model. The Scoping Opinion (paragraph 5.5.8) has recommended using the SNCB matrix approach, the report from the Searle *et al.* (2014)<sup>3</sup> modelling and the CEH SeabORD model (if available). There appears to be no guidance provided as to which of the resulting (and likely different) estimates should be given greatest weight and which should be used within subsequent PVAs. We also note that the use of the reported outputs from the Searle *et al.* (2014) model<sup>3</sup> do not take account of the lower displacement rate now recommended for kittiwake. Whilst we appreciate the pros and cons of each model, ICOL consider that it would be impractical, unreasonable and, ultimately, potentially confusing to produce PVAs according to each of the three variants. In this regard, we would like to reiterate our concern that the EIA should be proportionate. Therefore, ICOL propose that if the SeabORD model is available (and published) in time for the assessment, this should be used for the assessment of breeding

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<sup>1</sup> Cook, A.S.C.P., Humphreys, E.M., Masden, E.A. and Burton, N.H.K. (2014). *The avoidance rates of collision between birds and offshore turbines*. BTO Research Report no. 656.

<sup>2</sup> SNCBs (2014). Joint response from the Statutory Nature Conservation Bodies to the Marine Scotland Science avoidance rate review.

<sup>3</sup> Searle, K., Mobbs, D., Butler, A., Bogdanova, M., Freeman, S., Wanless, S. and Daunt, F. (2014). *Population consequences of displacement from proposed offshore wind energy developments for seabirds breeding at Scottish SPAs (CR/2012/03)*. Final report to Marine Scotland Science.

season displacement and barrier effects, with the non-breeding season impacts assessed using the SNCB matrix approach. For this approach to fit with the timescales for submission, ICOL consider that the SeaBORD model would have to be available by mid September. In the absence of the SeaBORD model, ICOL would welcome clear guidance as to which alternative approach should be adopted and should form the focus of the assessment for displacement and barrier effects. In relation to the above, are Marine Scotland able to provide further information on the content of the SeabORD model and the timescale for its availability so we can determine whether it is likely to be used in the impact assessment? If the timeframes are not aligned to ICOL's proposed submission date, can a clear alternative approach be confirmed as soon as possible? Can it also be confirmed that at a later date ICOL will not be requested to update modelling, if the SeabORD modelling is not used but becomes available during the determination period? Also, if displacement is assessed by one or other of the CEH modelling approaches, can Marine Scotland confirm what the appropriate buffer around the Development Area should be? Would it be 1 km as for the 2014 Appropriate Assessment for the Forth and Tay projects?

5. **Estimation of bird densities within the buffer:** The Scoping Opinion recommends that the impact assessment is based on the Development Area and a 2 km buffer around it (paragraph 5.5.3). The boat-based survey data on which the assessment will be based have been analysed at the level of the Development Area and a surrounding 4 km buffer. In order to undertake the assessment using a 2 km buffer it is intended to estimate the abundance of birds within this 2 km buffer by extrapolation on the basis of the densities from the 4 km buffer and the area of the 2 km buffer. Can Marine Scotland confirm that this approach is acceptable?
6. **Apportioning of impacts to Special Protection Area (SPA) populations of guillemot and razorbill during the non-breeding season:** The Scoping Opinion recommends that the apportioning of impacts in the non-breeding season to guillemot and razorbills is undertaken in the same way as for the breeding season (i.e. according to breeding colony size, distance from the colony to the Development Area and the proportion of open sea within foraging range of the colony – e.g. on pg 11 of the Scoping Opinion in response to the Scoping Report question 8.4.9 and Scoping Opinion paragraph 5.5.6). However, it is highly unlikely that the birds occurring in the Development Area (and buffer) in winter are from the same colonies as those occurring in the breeding season. It appears that this advice is based upon the assumption that because there are large enough numbers of these species in the outer Forth to designate part of the area as a pSPA, that these must be from the nearby colonies. The available evidence is contrary to this assumption. For instance, geo-locator tracking from the Isle of May has shown that guillemots and razorbills winter across the North Sea, with some birds even moving to the Barents Sea to moult (Harris *et al.* 2015)<sup>4</sup>. Ringing recoveries generally show that guillemots move south of their breeding locations, so many of the birds occurring in the outer Forth during the winter will come from colonies further north, including Norway and the Faroes. We therefore suggest that, based on the available evidence, impacts in the winter are apportioned across guillemot and razorbill colonies in the northern North Sea according to their population size only. Can Marine Scotland confirm that this approach is acceptable?

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<sup>4</sup> Harris, M.P., Wanless, S., Ballesteros, M., Moe, B., Daunt, F. and Erikstad, K.E., 2015. Geolocators reveal an unsuspected moulting area for Isle of May Common Guillemots *Uria aalge*. *Bird Study*, 62(2), pp.267-270.

7. **Apportioning of impacts on herring gulls in the non-breeding season:** There appears to be some contradiction in the Scoping Opinion regarding the recommended assessment of impacts on herring gull. On Page 12, it is stated that, "*non-breeding season Impacts are assessed at a Forth and Tay regional level*", while in paragraph 5.6.5 it is stated that, "*collisions during the non-breeding season should be apportioned across the regional population (a similar method was used previously for Moray Firth wind farms)*." It is therefore unclear what scale is being recommended. The regional scale for herring gulls in winter is likely to be much larger than just the Forth and Tay region and therefore we suggest that the latter approach is more appropriate, as advised by Furness (2015)<sup>5</sup>. Can Marine Scotland confirm if this approach is acceptable?
8. **Inclusion of shag amongst proportions of sabbatical birds for different species:** The Scoping Opinion recommends the use of a proportion of sabbatical birds in the Development Area that are not present in the colonies (page 25, paragraph 5.8.4). The advice also provides this information for shag, but the Scoping Opinion does not recommend scoping shag in to the assessment. Can Marine Scotland confirm if shag has been included in this advice in error?
9. **Considering variation in the estimated effects used in PVAs:** Advice is provided that PVAs are run with estimated impacts plus 10% greater and 10% lower impacts than the estimate (Scoping Opinion paragraph 5.8.4, bullet 6). However, no reason for using a value of 10% is given. We are concerned that this is a simple assumption with no consideration of the very different impact assessment uncertainties and population sizes between different species. As such, we are sceptical of the merits of adopting this approach. Could an explanation for this value be provided, or else confirmation be provided that the approach is not to be adopted?
10. **Use of existing gannet and puffin PVAs:** The advice to use the existing PVAs for gannet and puffin is welcomed (on pg 15 of the Scoping Opinion in response to scoping question 8.4.9). However, the population models used for these PVAs considered impacts in relation to breeding adults only and did not include impacts across the population age classes. Can clarification be provided on the advice regarding the use of the gannet and puffin PVAs with respect to the recommendation to consider all age classes in terms of impacts (e.g. paragraphs 5.6.7, 5.8.2 and 5.8.3 of the Scoping Opinion)?
11. **Option 2 CRM estimates for consented designs of the other Forth and Tay wind farms:** In order to complete the CIA according to the wind farm impact assessment method recommended in the Scoping Opinion (on pgs 10-11 of the Scoping Opinion in response to Scoping Report question 8.4.9), it will be necessary to collate the CRM Option 2 outputs from the existing consents for Neart na Gaoithe, Seagreen Alpha and Seagreen Bravo or the Option 2 outputs for the revised consents for these wind farms. Can MS provide these by 8<sup>th</sup> September 2017 as ICOL have been unable to source these from any other applications? Estimating the CRM impacts is an early-stage task in the Inch Cape EIA programme and has to be completed and finalised in sufficient time to enable PVAs to proceed. Hence, the request to obtain these CRM outputs within a short timescale.

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<sup>5</sup> Furness, R.W., 2015. Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, (164).

12. **Use of the RSPB FAME data:** The RSPB has previously indicated that the tracking data from their FAME study should be used to revise the foraging ranges of some of the key species in this assessment. However, this has not been supplied at the time of writing. If this cannot be supplied by 8<sup>th</sup> September 2017 we will not be able to incorporate any of this information in the impact assessment (the determination of the colonies with connectivity to the Development Area being an early element of the work required for the assessment). This was a point of discussion at the ornithology Scoping Meeting and ICOL would seek confirmation that this is acceptable. Likewise, as above, can it be confirmed that should the data not be provided in time, ICOL will not be requested to update their assessment at a later date during the determination period.
13. **MS apportioning tool:** Related to the above point, the Scoping Opinion indicates that the Marine Scotland apportioning tool should be used for the assessment if it is available (pg 11 of the Scoping Opinion in response to Scoping Report question 8.4.9). This tool would need to be made available by mid September to allow it to be incorporated into the assessment. Can Marine Scotland advise as to when it is likely to become available? As above, can it be confirmed that should the apportioning tool not be available in time, ICOL will not be requested to update their assessment at a later date during the determination period.
14. **SPA colony counts:** The Scoping Opinion recommends that the most recent SPA colony counts should be used in the calculation for apportioning impacts between colonies (paragraphs 5.4.4 and 5.6.3 of the Scoping Opinion). Information on the most recent colony counts for the relevant SPAs is helpfully provided by SNH in their advice. However, in relation to the Buchan Ness to Collieston Coast SPA it is advised that the 2016 – 2017 counts will be available soon and, if not, SNH will provide further advice. Can these counts be made available to ICOL by 8<sup>th</sup> September 2017 or can advice be provided on the alternative counts to be used for this SPA? As above, can it be confirmed that should these count data not be available in time, ICOL will not be requested to update their assessment at a later date during the determination period.
15. **Determination of breeding seabird foraging ranges:** In relation to the apportioning of impacts in the breeding season to breeding colony populations, the Scoping Opinion recommends that impacts should be apportioned to breeding colonies within foraging range of the Development Area. The Scoping Opinion states that the foraging range should be taken as the mean maximum foraging range, presumably as defined by Thaxter et al. (2012)<sup>6</sup> in most cases (pg11 of the Scoping Opinion in response to scoping question 8.4.9). However, it should be noted that the Environmental Statement for the consented Inch Cape Project and the 2014 Appropriate Assessment for the Forth and Tay projects generally defined the foraging range by the mean maximum foraging range  $+1SD$  (e.g. for kittiwake the Buchan Ness to Collieston Coast SPA is beyond mean max foraging range of the Development Area but within mean max foraging range  $+1SD$ ). Can confirmation be provided that the definition of the foraging range should be as used previously (i.e. the mean max  $+1SD$  for most species)?

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<sup>6</sup> Thaxter, C. B., Lascelles, B., Sugar, K., Cook, A. S. C. P., Roos, S., Bolton, M., Langston, R. H. W. and Burton, N. H. K. (2012). Seabird foraging ranges as a tool for identifying candidate Marine Protected Areas. *Biological Conservation*, **156**, 53-61.

16. **PVA requirements:** The Scoping Opinion provides advice on the different PVA's requested for the different species being assessed (section 5.8 of the Scoping Opinion). This includes +/-10% for each impact. In receiving this request ICOL have collated the requested PVA's and found that this totals at least 75 different combinations (see Table 1). Additional PVAs may be required (e.g. for the St Abbs Head to Fast Castle SPA populations or for herring gull SPA populations). Whilst we are sure at the time of producing the Scoping Opinion Marine Scotland would not have appreciated the level of PVA work this would entail, now that we have highlighted it we would expect a more reasonable approach could be adopted, that would make the assessment more akin to a proportionate EIA. Of the PVA combinations set out below, ICOL consider the inclusion of those based upon +/-10% of the estimated effects to be the least justifiable. Given this, ICOL propose that the number of PVA combinations needs to be reduced and that this should be done by the omission of those that consider +/-10% of the estimated effects. Can MS confirm that the approach advocated by ICOL is acceptable? If not, can further advice be provided that would be more aligned to the purpose of the EIA?


**Table 1: Different PVAs requested in the Marine Scotland Scoping Opinion for the Inch Cape Wind Farm**

Species	SPA	Site(s)	Collisions	Displacement	Collisions & Displacement	+10%	-10%
KI	Forth Islands	WF only			X	X	X
KI	Forth Islands	FTOWDG			X	X	X
KI	Forth Islands	All UK			X	X	X
KI	Fowlsheugh	WF only			X	X	X
KI	Fowlsheugh	FTOWDG			X	X	X
KI	Fowlsheugh	All UK			X	X	X
KI	Forth Islands	WF only	X			X	X
KI	Forth Islands	FTOWDG	X			X	X
KI	Forth Islands	All UK	X			X	X
KI	Fowlsheugh	WF only	X			X	X
KI	Fowlsheugh	FTOWDG	X			X	X
KI	Fowlsheugh	All UK	X			X	X

Species	SPA	Site(s)	Collisions	Displacement	Collisions & Displacement	+10%	-10%
PU	Forth Islands	WF only		X		X	X
PU	Forth Islands	FTOWDG		X		X	X
GU	Forth Islands	WF only		X		X	X
GU	Forth Islands	FTOWDG		X		X	X
GU	Fowlsheugh	WF only		X		X	X
GU	Fowlsheugh	FTOWDG		X		X	X
RA	Forth Islands	WF only		X		X	X
RA	Forth Islands	FTOWDG		X		X	X
RA	Fowlsheugh	WF only		X		X	X
RA	Fowlsheugh	FTOWDG		X		X	X
GX	Forth Islands	WF only			X	X	X
GX	Forth Islands	FTOWDG			X	X	X
GX	Forth Islands	All UK			X	X	X

Thank you for your time to consider these points of clarification and we hope these issues can be resolved quickly so as not to cause any further delay to the assessment. ICOL look forward to receiving your response but if you have any questions in the meantime please do not hesitate to contact me.

Yours sincerely,  
[Redacted]

 [Redacted]

## **Appendix A**

List of other Projects to be included in the cumulative impact assessment (CIA) for collisions to kittiwake and gannet during the non-breeding season:

- Beatrice
- Beatrice Demonstrator
- Blyth (NaREC Demonstration)
- Dogger Bank Creyke Beck A & B
- Dogger Bank Teesside A & B
- Dudgeon
- East Anglia ONE
- East Anglia THREE
- EOWDC (Aberdeen OWF)
- Firth of Forth Alpha and Bravo
- Galloper
- Greater Gabbard
- Gunfleet Sands
- Hornsea Project 1
- Hornsea Project 2
- Humber Gateway
- Kentish Flats
- Lincs
- London Array (Phase 1)
- Lynn and Inner Dowsing
- Moray Firth (EDA)
- Neart na Goithe
- Race Bank
- Rampion
- Scroby Sands
- Sheringham Shoal
- Teesside
- Thanet
- Triton Knoll
- Westermost Rough