



25th February 2011
Ref: DSG(2011)C157

Douglas Watson
Marine Development Officer
ScottishPower Renewables
2nd Floor, New Building
Cathcart Business Park
Spean Street
Glasgow
G44 4BE

Dear Mr Watson

**Proposed Ness of Duncansby Tidal Array
Request for a Scoping Opinion, January 2011**

The Dounreay Stakeholder Group (DSG) is an independent group consisting of over 20 different organisations and is pleased to have the opportunity to respond to the scoping document.

On the specific questions you raise in the document.

- **Have all regulatory requirements that the project should be taking into account been identified?**

The DSG has no comment to make as there are others better qualified to respond to this question.

- **Do the requirements outlined for assessment of effects look appropriate and complete?**

It appears that consultation will assist in gather baseline information and if this is the case then the consultation process should include local businesses, recreational clubs, and others that may be affected by the proposal. It would be useful to define these groups and to consult with specific focus groups to allow views to come forward in a transparent way and allows an understanding to develop of the benefits and/or detriments different organisations will have.

- **There should be a route for feedback to these organisations during the assessment methodology.**

Please respond to:

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Part of the Environmental Impact Assessment will be undertaken by desk-top studies using information that is already accessible. We believe that this has the potential of missing some significant information which is available by speaking to local stakeholders (or via focus groups) and can include a range of stakeholders including fishermen, leisure water users, Field clubs, etc).

- **Are there any other key sources of environmental information that should be consulted?**

DSG believe it is essential to ensure that you capture local knowledge and believe this can only be done by holding discussions with local stakeholders.

- **Have the most likely and significant effects been identified through this analysis? Are there any others that should be considered for inclusion in the full assessment process and if so why?**

The DSG has no comment to make as there are others better qualified to respond to this question.

- **Does the list of proposed consultees reflect the range of stakeholders that should be considered for this project?**

DSG believes that further work needs to be done to identify other local stakeholders/ groups that have the potential to provide significant knowledge in the area. While the list is not exhaustive the most obvious ones not mentioned here are:

- Environment Research Institute, Thurso
- North Highland Tourism Initiative
- Numerous sports/leisure organisations, ie Sports Council, Sea Angling, etc.

On a more general note:

Section 4.4.1 – Commercial Fisheries and Aquaculture: This section notes that Scrabster is the main port for commercial fishing and sea angling and that fishing in the area employs relatively few people. While this may be true it is important to note the indirect employment which includes the fish market, fish haulage, etc). Other harbours, such as Wick and Gills also have small scale fishing activities.

Section 4.4.6 – Socio-Economics: While DSG welcomes the opportunities that may benefit the Caithness and North Sutherland economy there is a need to understand fully the benefits/job creation that this project may bring to the area. In 3.3.7.4 there is a statement that the tidal devices will be delivered by sea which implies that these will not be manufactured in Caithness. A far clearer picture needs to emerge on the permanent employment opportunities.

Discussions should be ongoing with Caithness and North Sutherland Regeneration Partnership and the Caithness Chamber of Commerce to ensure that skills and capabilities of this area are well understood to maximise the potential, both to

ScottishPower and to the local community.

Section 4.4.11 – Summary of main potential environmental effects: Table 20 appears to have under-estimated the recreational activity and DSG suggests that focus groups with a number of organisations who are involved in marine recreation pursuits is included in your considerations.

Section 5.2 – The Environmental Impact Assessment: The impact on tourism and recreation should be included in this assessment.

DSG would like to suggest that a local liaison meeting is organised at the earliest opportunity to allow the developer to meet with local stakeholders on a regular basis to ensure that everyone is informed. DSG would be willing to appoint a representative to attend such meetings as would other local organisations.

Yours sincerely

Sent electronically without signature

Bob Earnshaw
DSG Chairman