

From: [Helen Croxson](#)
To: [Aires C. \(Catarina\)](#)
Cc: [Nick Salter](#); [Kevin Colcomb](#)
Subject: RE: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May
Date: 02 June 2016 09:43:47

Catarina,

Apologies for the delay in replying.

Please find comments from our Counter Pollution Team below. If you have any questions please contact Kevin Colcomb direct at Kevin.Colcomb@mcga.gov.uk

Overall: I would have thought the Scottish Environment Group would feature in this document – very simply since any spill might soon be outwith the jurisdiction of the windfarm?

Many references to seeking ad-hoc advice from expert oil spill response organisation? Example pp50. Should the plan describe how this will be done at midnight??

Example POLREP??

More flow charts to simplify some of the processes?

5.2.8 Should there be a link between ECW and the Scottish SEG?

5.5.1 If there exists a risk of a vessel collision with the wind farm then that could be a tier three incident? Does DECC include incidents involving vessels for the purpose of this plan?

5.6.19 SRC no longer exists, and how does an SRC coordinate a contingency plan?

Section 6: This section is very detailed. It would be useful if a worst case scenario with oil quantities were described early in the section.

6.2.5 Again if vessel collisions are included in the RA – why can that not result in a tier 3 spill. Is it that the plan considers only standby vessels and not passing traffic?

Table 6.1 page 36 – vessel to structure collision? Loss of fuel between collision?

Table 6.1 No likely tier greater than tier 1?

Table 6.4 Estimated inventory does not provide any numbers only where each oil type is found across the operation. Approximate numbers should surely be included?

7.2.4 Marine Coordinator takes charge – even if it is a big spill? Is there an agreement between MCA and DECC that the MC will take charge for a spill greater than tier 1?

Pp49 Expertise for slick tracking?

Section 7.7 this section acknowledges strategies for a significant spill – yet there are no details of how a tier 2/3 responder would be contracted in.

Kind regards

Helen

Helen Croxson
Marine Licensing Lead
Maritime and Coastguard Agency
Bay 2/20 Spring Place
105 Commercial Road
Southampton
SO15 1EG

Tel: 023 80329184

Email: Helen.Croxson@mcga.gov.uk

Please note I currently work Tuesdays, Wednesdays and Thursdays.

From: Catarina.Aires@gov.scot [mailto:Catarina.Aires@gov.scot]

Sent: 07 April 2016 18:41

To: jnccadvice@jncc.gov.uk; marineenergy@snh.gov.uk; planning.dingwall@sepa.org.uk; navigationsafety<navigationsafety@mcga.gov.uk>; planning.scotland@rspb.org.uk; development.control@moray.gov.uk; service.point@highland.gov.uk

Cc: MS_Renewables@gov.scot; Nicola.Bain@gov.scot; Jessica.Drew@gov.scot

Subject: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000

MARINE (SCOTLAND) ACT 2010 & MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Dear Sir/Madam,

Beatrice Offshore Windfarm Ltd (“BOWL”), having received consent under the above legislation and in order to discharge conditions of their Offshore Transmission Works (“OfTW”) and Offshore Wind Farm (“OWF”) Marine Licences, has submitted to the Licensing Authority the documents attached.

Please find enclosed a proposed ‘Marine Pollution Contingency Plan’ (“MPCP”) post-consent plan and covering letter addressed to MS-LOT from BOWL. The purpose of the MPCP is to attempt to satisfy the requirement of condition 3.1.12 of the OfTW Marine Licence (Licence number 04461/14/1) and condition 3.1.12 of the OWF Marine Licence (Licence number 04462/14/1), issued on the 2nd September 2014.

The Marine Licences, as well as other relevant documents, can be found on our website, following the link below:
<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Beatrice>

The conditions state that the plan is to be submitted to the Scottish Ministers for their written approval. MS-LOT, on behalf of the Scottish Ministers, would like to invite the JNCC, SNH, SEPA, MCA, RSPB Scotland, Moray Council and the Highland Council to comment on the attached MPCP, in order to determine whether it is fit for purpose for the Scottish Ministers to give it their written approval. Please note that we do not seek comments on the Marine Licences nor on the conditions, which will not be amended.

We would appreciate any comments you may have on the attached MPCP. If you wish to submit any comments, please do so to MS.MarineRenewables@gov.scot before the **20th May 2016**.

Best regards,
Catarina

Catarina Aires

Marine Renewables Casework Officer

[marinescotland](http://www.marinescotland.gov.scot)

Marine Scotland Licensing Operations Team

Scottish Government

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

Phone: +44 (0)1224 295 689 | S/B: +44 (0)1224 876 544

Catarina.Aires@gov.scot / MS.MarineRenewables@gov.scot

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

Please note Renewables new email address

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Aires C (Catarina)

From: Neal MacPherson <Neal.MacPherson@moray.gcsx.gov.uk>
Sent: 07 June 2016 11:01
To: Aires C (Catarina)
Subject: RE: [GCSX] Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Apologies Catarina,

I'd meant to reply on the 27th confirming that we'd discussed the pollution contingency plan with our Emergency planning officer, who's only comment was that the contact number stated for Moray Council in the contingency plan differs from the current emergency contact number which has changed to 03457 565656.

Regards,

Neal MacPherson
Principal Planning Officer
Development Management Section
The Moray Council
High Street
Elgin
IV30 1BX
Tel. 01343 563266
neal.macpherson@moray.gov.uk

From: Catarina.Aires@scotland.gsi.gov.uk [mailto:Catarina.Aires@scotland.gsi.gov.uk]
Sent: 07 June 2016 10:23
To: Neal.MacPherson@moray.gcsx.gov.uk
Cc: Nicola.Bain@scotland.gsi.gov.uk; Jessica.Drew@scotland.gsi.gov.uk
Subject: [GCSX] Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Dear Neal,

Please refer to the emails below, granting an extension to Moray Council until the 27th of May to comment on BOWL Post-consent Marine Pollution Contingency Plan. This date has now passed and we still haven't received any comments from you. Would you be able to advise when we you can expect comments on this plan from Moray Council?

Best regards,
Catarina

Catarina Aires

Marine Renewables Casework Officer

[marinescotland](http://marinescotland.gov.uk)

Marine Scotland Licensing Operations Team

Scottish Government

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

Phone: +44 (0)1224 295 689 | S/B: +44 (0)1224 876 544

From: Aires C (Catarina)
Sent: 24 May 2016 14:44
To: 'Neal MacPherson'
Cc: Bain N (Nicola) (MARLAB); Drew J (Jessica)
Subject: RE: Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Dear Neal,

Thank you for your reply. An extension until the 27th will be fine, please get back in touch in case you are unable to meet this date.

Many thanks,
Catarina

From: Neal MacPherson [<mailto:Neal.MacPherson@moray.gcsx.gov.uk>]
Sent: 24 May 2016 14:18
To: Aires C (Catarina)
Subject: RE: Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Apologies Catarina,

I'm hoping to have a quick discussion over the pollution contingency plan with the Moray Council Emergency Planning Officer (covering events such as major flooding, disasters etc) and ask therefore for a short extension to the deadline?

May I ask for an extension until this Friday 27th and we'll try and get something formal back to you for then.

Regards,

Neal MacPherson
Principal Planning Officer
Development Management Section
The Moray Council
High Street
Elgin
IV30 1BX
Tel. 01343 563266
neal.macpherson@moray.gov.uk

From: Catarina.Aires@gov.scot [<mailto:Catarina.Aires@gov.scot>]
Sent: 24 May 2016 11:42
To: navigationsafety@mcga.gov.uk; DC-General Enquiries; service.point@highland.gov.uk
Cc: Nick.Salter@mcga.gov.uk; Nicola.Bain@gov.scot; Jessica.Drew@gov.scot
Subject: Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Dear Sir/Madam,

The deadline for providing comments on BOWL's Post-consent Marine Pollution Contingency Plan (MPCP) was **20th May 2016**. As the deadline has now passed, please contact us immediately to arrange an extension to the

consultation period if you wish to provide comments. If you have no comments to make please submit a “nil return” response.

If you require further information please let us know.

Yours sincerely,

Catarina

Catarina Aires

Marine Renewables Casework Officer

[marinescotland](#)

Marine Scotland Licensing Operations Team

Scottish Government

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

Phone: +44 (0)1224 295 689 | S/B: +44 (0)1224 876 544

Catarina.Aires@gov.scot / MS.MarineRenewables@gov.scot

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

From: Aires C (Catarina)

Sent: 16 May 2016 17:01

To: 'jnccadvice@jncc.gov.uk'; marineenergy@snh.gov.uk; SEPA Planning, Dingwall (planning.dingwall@sepa.org.uk); 'navigationsafety@mcga.gov.uk'; 'development.control@moray.gov.uk'; 'service.point@highland.gov.uk'

Cc: 'MS_Renewables@scotland.gsi.gov.uk'; Bain N (Nicola) (MARLAB); Drew J (Jessica)

Subject: Reminder: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Dear Sir/Madam,

This is a reminder that the consultation on BOWL’s Marine Pollution Contingency Plan (MPCP) detailed below is due to close this Friday. I would be grateful if you could submit any comments that you may have by 20th May 2016.

If you are unable to meet this deadline, please contact us to arrange an extension to the consultation period.

If you do not have any comments, please submit a “nil return” response.

Best regards,

Catarina

Catarina Aires

Marine Renewables Casework Officer

[marinescotland](#)

Marine Scotland Licensing Operations Team

Scottish Government

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

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Catarina.Aires@gov.scot / MS.MarineRenewables@gov.scot

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

Please note Renewables new email address

From: Aires C (Catarina)

Sent: 07 April 2016 18:41

To: 'jnccadvice@jncc.gov.uk'; marineenergy@snh.gov.uk; SEPA Planning, Dingwall (planning.dingwall@sepa.org.uk); 'navigationsafety@mcga.gov.uk'; planning.scotland@rspb.org.uk; development.control@moray.gov.uk;

Catarina Aires
Licensing Operations Team
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

BEATRICE OFFSHORE WIND FARM LIMITED (BOWL) MARINE POLLUTION CONTINGENCY PLAN - MSS COMMENTS

Marine Scotland Science (MSS) has reviewed the submitted MPCP and has provided the following comments.

marine mammals

MSS have no comments on this plan that relate specifically to marine mammals

marine fish ecology

MSS have no comments relating to marine fish ecology

benthic ecology

MSS have no comments relating to marine benthic ecology

diadromous Fish

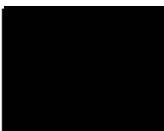
MSS suggests that there should be a mechanism in place to ensure any mortalities or other effects on fish or other biota which are observed, which result from any incidents, are recorded and reported.

aquaculture

MSS aquaculture planning have no specific comments to make on the Beatrice Offshore Wind Farm Limited (BOWL): Marine Pollution Contingency Plan. There are no further comments to add to those made on 02/03/2016 in response to the Post Consent Vessel Management Plan.

Hopefully these comments are helpful to you. If you wish to discuss any matters further contact the MSS Renewables in-box MS_Renewables@scotland.gsi.gov.uk.

Yours sincerely



Paul Stainer

Marine Scotland Science

22 May 2016

From: [Nathan, Charles](#)
To: [Aires C \(Catarina\)](#)
Cc: [MS Marine Renewables](#)
Subject: RE: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May
Date: 13 May 2016 16:13:08
Attachments: [image001.gif](#)
[image002.gif](#)

Dear Ms Aires,

Thank you for consulting RSPB Scotland on the above noted Plan. We have no comments to make on the proposals.

Regards,
Charles

Charles Nathan
Marine Conservation Planner

Scottish Headquarters 2 Lochside View, Edinburgh Park, Edinburgh, EH12 9DH
Tel 0131 317 4100

rspb.org.uk



RSPB logo



RSPB Scotland is part of the RSPB, the country's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

From: Nathan, Charles **On Behalf Of** planning, scotland
Sent: 14 April 2016 11:44
To: Nathan, Charles
Subject: FW: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Charles Nathan
Marine Conservation Planner

Scottish Headquarters 2 Lochside View, Edinburgh Park, Edinburgh, EH12 9DH
Tel 0131 317 4100

rspb.org.uk

Drew J (Jessica)

From: Planning Dingwall <Planning.Dingwall@sepa.org.uk>
Sent: 08 April 2016 12:13
To: Aires C (Catarina)
Subject: RE: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

Hello Ms Aires

Thank you for your email. I have checked to make sure and we didn't specifically ask that a condition be applied requiring this submission so we won't be providing comments on it.

Kind regards

Susan

Susan Haslam
Senior Planning Officer

Planning Service, SEPA, Graesser House, Dingwall Business Park, Dingwall, IV15 9XB
Direct line: 01349 860359 Mobile: 07713053767 email: susan.haslam@sepa.org.uk
Please note I am not at work Friday afternoons

From: Catarina.Aires@gov.scot [mailto:Catarina.Aires@gov.scot]
Sent: 07 April 2016 18:41
To: jnccadvice@jncc.gov.uk; marineenergy@snh.gov.uk; Planning Dingwall; navigationsafety@mcga.gov.uk; planning.scotland@rspb.org.uk; development.control@moray.gov.uk; service.point@highland.gov.uk
Cc: MS_Renewables@gov.scot; Nicola.Bain@gov.scot; Jessica.Drew@gov.scot
Subject: Consultation on BOWL Post-consent Marine Pollution Contingency Plan, by 20th May

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Drew J (Jessica)

From: Catriona Gall <Catriona.Gall@snh.gov.uk>
Sent: 18 May 2016 14:20
To: Aires C (Catarina)
Cc: MS Renewables; Bain N (Nicola) (MARLAB); Drew J (Jessica); Sarah.Canning@jncc.gov.uk; Karen Hall (JNCC); Erica Knott
Subject: BOWL Marine Pollution Contingency Plan - SNH & JNCC comments

Dear Catarina,

Thanks for providing us with a copy of BOWL's Marine Pollution Contingency Plan (MPCP) for comment.

As to be expected, there is a certain amount of overlap between this document and the Environmental Management Plan (EMP) submitted previously. (There's an overview of pollution prevention measures and contingency planning in chapter 9 of the EMP.) We have reviewed the MPCP in light of the comments we provided on the EMP (letter dated 28 August 2015) and confirm that it addresses the key issues we raised previously for consideration – namely the role of the Environmental Clerk of Works, the chain of command in relation to environmental management on-site and key project communications relating to the management, containment and reporting of any pollution event.

The latter is addressed, in detail, in part 2 of the MPCP which presents BOWL's pollution incident response procedures. We consider these to be practical and fit-for-purpose, and we think that the action checklists for key personnel (presented in section 7) are particularly helpful.

We therefore confirm that, from SNH and JNCC's perspective, there are no outstanding issues to be addressed in the MPCP in order to be able to discharge condition 3.1.12 of the marine licence.

Yours sincerely,

Catriona Gall

Marine Renewables Casework Adviser - Offshore Wind

SNH
Battleby
Redgorton
Perthshire
PH1 3EW

direct dial: 01738 - 458665

From: Catarina.Aires@gov.scot [mailto:Catarina.Aires@gov.scot]
Sent: 07 April 2016 18:41
To: jnccadvice@jncc.gov.uk; MARINEENERGY; planning.dingwall@sepa.org.uk; navigationsafety@mcga.gov.uk; planning.scotland@rspb.org.uk; development.control@moray.gov.uk; service.point@highland.gov.uk
Cc: MS_Renewables@gov.scot; Nicola.Bain@gov.scot; Jessica.Drew@gov.scot
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