

From: Drew J (Jessica)
To: ["Neal MacPherson"](#)
Cc: [Teresa Ruggeri](#); [Aires C \(Catarina\)](#); [Dinsdale R \(Rosanne\)](#)
Subject: RE: BOWL Traffic and Transportation Plan ("TTP")
Date: 29 September 2016 09:52:00

Hi Neal

That's great, thank you for letting me know.

Kind regards

Jessica

From: Neal MacPherson [mailto:Neal.MacPherson@moray.gcsx.gov.uk]
Sent: 29 September 2016 09:48
To: Drew J (Jessica)
Cc: Teresa Ruggeri; Aires C (Catarina); Dinsdale R (Rosanne)
Subject: RE: BOWL Traffic and Transportation Plan ("TTP")

Hello,

Apologies for not responding sooner, having reviewed the document, and the likely possible use of Moray Harbours and related infrastructure (Buckie in particular) Moray has no objection to submitted Traffic and Transportation Plan TTP.

Regards,

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

From: Jessica.Drew@scotland.gsi.gov.uk [mailto:Jessica.Drew@scotland.gsi.gov.uk]
Sent: 29 September 2016 07:19
To: Neal.MacPherson@moray.gcsx.gov.uk; Teresa.Ruggeri@moray.gcsx.gov.uk
Cc: Catarina.Aires@scotland.gsi.gov.uk; Rosanne.Dinsdale@scotland.gsi.gov.uk
Subject: [GCSX] RE: BOWL Traffic and Transportation Plan ("TTP")

Good morning Neal/Teresa

I would be grateful if you would contact me regarding the below consultation.

As you are aware the consultation ended on the 13th September 2016. As we have not received any correspondence we have assumed a nil response from the

Moray Council. If this is not the case please would you contact me before the close of business today. I am contactable by email all day and by phone from 1 – 3pm.

Kind regards

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Direct Line: +44 (0)1224 295683

e. jessica.drew@gov.scot / MS.MarineRenewables@gov.scot

w: <http://www.gov.scot/marinescotland>

From: Teresa Ruggeri [<mailto:Teresa.Ruggeri@moray.gcsx.gov.uk>]
Sent: 22 September 2016 16:53
To: Drew J (Jessica)
Subject: RE: BOWL Traffic and Transportation Plan ("TTP")

Hi Jessica

Tried to phone you back but no reply. I managed to get Neal MacPherson and he has advised he will get in touch tomorrow

Teresa

From: Jessica.Drew@gov.scot [<mailto:Jessica.Drew@gov.scot>]
Sent: 05 September 2016 13:40
To: Mark.Paterson@transport.gov.scot; eplanning@highland.gov.uk; DC-General Enquiries
Cc: Catarina.Aires@gov.scot; Rosanne.Dinsdale@gov.scot
Subject: BOWL Traffic and Transportation Plan ("TTP")

Dear Sir/Madam

This is a gentle reminder that the consultation detailed below will close on **Tuesday 13th September 2016**. Should you not have any comments to make on this post-consent plan please submit a 'Nil Response'.

Yours faithfully

Jessica Drew

Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
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ELECTRICITY ACT 1989

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

MARINE (SCOTLAND) ACT 2010, 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 Section 36 Consent and Marine Licence, have submitted to the Licensing Authority the documents attached.

Please find attached a proposed Traffic and Transportation Plan ("TTP") and a cover letter addressed to MS-LOT from BOWL. The purpose of the TTP is to attempt to satisfy the requirements of condition 26 of the Section 36 Consent awarded to BOWL on the 19th March 2014 and condition 3.2.2.11 of the OfTW Marine Licence, issued on the 2nd September 2014.

The Decision Letter and Conditions, 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 condition states that the plan is to be submitted to the Scottish Ministers for their written approval following a consultation with the Transport Scotland (TS), The Highland Council (THC), Morcay Council (MC) and any other such advisors as may be required at the discretion of the Scottish Ministers. MS-LOT, on behalf of the Scottish Ministers, would also like to invite comments from SNH and SEPA on the attached TTP.

We would appreciate any comments you may have on the attached TTP 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 Consent nor on the conditions, which will not be amended.

If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before **Tuesday the 13th September 2016.**

Yours faithfully
Jessica

Jessica Drew
Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

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Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a

chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair
gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil
beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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From: [David Mudie](#)
To: [ePlanning](#); [Drew J \(Jessica\)](#)
Subject: RE: BOWL Traffic and Transportation Plan ("TTP")
Date: 06 September 2016 13:45:00
Attachments: [image001.jpg](#)

Jessica

I can confirm that the Council has no comment to make on this submission.

David

David Mudie

Team Leader - Development Management

Development and Infrastructure Service, The Highland Council, Glenurquhart Road, Inverness, IV3 5NX
(01463) 702255

This advice is given without prejudice to the future consideration of and decision on any application received by The Highland Council.

Thathar a' toirt seachad na comhairle seo gun chlaon-bhreith do bheachdachadh air agus co-dhùnadh a thaobh tagradh sam bith a tha Comhairle na Gàidhealtachd a' faighinn san àm ri teachd

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Follow up documentation for existing planning applications

Follow up documentation should no longer be submitted directly to Planning Officers or to Area Planning Offices. If you would like to submit revised plans or any other follow up/additional documentation in relation to an existing application, please do so by using the Post Submission Additional Document online form available on the [ePlanning.scot](#) Portal. Further guidance on how to do this can be found here on our Planning Web Pages. Please remember to quote the correct application reference number on the online form before submitting. Thank you for your co-operation.

Register at <http://consult.highland.gov.uk> to view, comment and be kept up to date on any future Development Plan documents in Highland.

From: Louise Ross - eProcessing Centre **On Behalf Of** ePlanning
Sent: 06 September 2016 11:55
To: David Mudie
Subject: FW: BOWL Traffic and Transportation Plan ("TTP")

FYI

From: Sent: 05 September 2016 13:40
To: Mark.Paterson@transport.gov.scot; ePlanning; development.control@moray.gov.uk
Cc: Catarina.Aires@gov.scot; Rosanne.Dinsdale@gov.scot

Subject: GSX: BOWL Traffic and Transportation Plan ("TTP")

Dear Sir/Madam

This is a gentle reminder that the consultation detailed below will close on **Tuesday 13th September 2016**. Should you not have any comments to make on this post-consent plan please submit a 'Nil Response'.

Yours faithfully

Jessica Drew

Marine Renewables Casework Officer
Marine Scotland Licensing Operations Team

Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
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The condition states that the plan is to be submitted to the Scottish Ministers for their written

approval following a consultation with the Transport Scotland (TS), The Highland Council (THC), Moray Council (MC) and any other such advisors as may be required at the discretion of the Scottish Ministers. MS-LOT, on behalf of the Scottish Ministers, would also like to invite comments from SNH and SEPA on the attached TTP.

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If you wish to submit any comments, please send them to MS.MarineRenewables@gov.scot before **Tuesday the 13th September 2016.**

Yours faithfully
Jessica

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sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo le gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh, leig fios chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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FAO – Jessica Drew
Marine Scotland Licensing Operations Team
The Scottish Government

Your Ref:

Our ref:

MS.MarineRenewables@gov.scot

Date:
07 September 2016

Dear Ms Drew

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2000
MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007
(AS AMENDED)
COMMENTS ON TTP FOR THE PROPOSED BEATRICE OFFSHORE WIND FARM.**

Your consultation request, dated 16 August 2016, has been passed to CH2M for review in their capacity as Term Consultant to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the content of the Traffic and Transportation Plan (TTP) produced by Beatrice Offshore Windfarm Ltd 2016, Transport Scotland would like to provide the following comments.

It is acknowledged that the TTP is intended to provide sufficient detail to allow the discharge of the relevant Section 36 and Offshore Transmission Works (OfTW) Marine Licence conditions, providing an overview of the traffic and transport associated with the construction of the Development, utilising the road network. It is noted that the TTP excludes the components transported by sea either directly or via a marshalling port, but that their associated road traffic movements have been described in the TTP.

It is also acknowledged that the TTP does not apply to any works associated with the construction of the Marine Coordination Centre nor the Onshore Transmission Works (OnTW), as these elements do not form part of the Development which is the subject of the Section 36 consent and Marine Licence conditions.

Introduction

It is noted that the production of the TTP is to present a mitigation strategy for the impact of road based traffic and transportation associated with the construction of the OfTW. The relevant conditions are suitably summarised in Table 1.1 of the TTP.

Transport Scotland are content with the scope of the TTP outlined in Section 1.3, specifically that the TTP considers traffic using the road network only, not including traffic associated with the construction of the Marine Coordination Centre nor the Onshore Transmission Works (OnTW).

Transport Scotland acknowledge the guidance documents taken into consideration. However, please note that the 'Transport Assessment Guidance' published by the Scottish Government in

2012 should have been referred to in preference to The Department for Transport (DfT) Guidance on Transport Assessment. Nevertheless, it is not considered that reference to the Scottish Government guidance will have a perceptible impact on the subsequent methodology or assessment.

Transport Scotland also agree with the use of the two broad principles from the IEMA guidelines, which are generally used as a screening process to determine the scale and extent of the environmental assessment of road traffic.

Transport Scotland also acknowledge the use of existing traffic count data in the vicinity of the ports and airports being considered, to determine existing traffic volumes. Also, the use of TEMPRO to forecast future traffic levels, extrapolating the existing traffic volumes sourced from DfT counters, is acceptable to Transport Scotland.

It is also acceptable to Transport Scotland that if traffic generated by the OfTW does not exceed the thresholds outlined in the IEMA guidance when compared against the estimated future year traffic volumes, then the significance of the OfTW traffic effects can be considered to be low or not significant, and that further detailed assessment is not warranted.

Transport Scotland also recognise that the other consent plans listed in Section 1.5 of the TTP have, where relevant, informed the TTP.

BOWL Statement of Compliance

Transport Scotland note the statements of compliance and legislative requirements outlined in Chapter 2. This includes a commitment that where significant updates or amendments are required to the TTP, there will be a requirement for Scottish Ministers to be informed and, where necessary, that the TTP will be updated or amended.

Updates and Amendments to the TTP

The proposed change management process outlined in Figure 3.1, when it may be necessary to update the TTP as a result of significant new information related to traffic and transport, is acceptable to Transport Scotland.

Development Overview

Chapter 4 of the TTP provides a brief overview of the development relevant to the TTP providing a summary of the main components of the development, a description of the location of the development, and reference to the associated construction programme. The level of detail provided is deemed acceptable to Transport Scotland.

Development Activities and Movements

Transport Scotland note that Chapter 5 of the TTP references the main contractors and their proposed roles, as well as descriptions of the main ports, harbours and airports to/from which traffic movements will be generated during the construction period.

Section 5.4 of the TTP outlines the construction activities and associated vehicle movements, initially defining the components that will not be transported on road. Transport Scotland acknowledge, therefore, that the associated construction traffic will principally comprise the movement of staff (using cars, vans and other light good vehicles), transportation of grout (HGV), transportation of supplies (HGV), and transportation of waste (HGV).

Construction Road Traffic

Chapter 6 of the TTP provides the detail on the number of anticipated traffic movements during construction of the Development.

Table 6.1 of the TTP summarises the baseline traffic data sourced from existing count sites on the road network adjacent to the appropriate ports, harbours and airports. It is noted that Table 6.1 presents the estimated future year traffic flows only, and that Chapter 6 does not provide detail on the existing traffic volumes or the growth factors (from TEMPRO) used to extrapolate these to 2019.

It is recommended that this information is provided to provide clarity on the process. Nevertheless, it is noted that this 2019 baseline forms the basis of the assessment of the effects of the estimated construction traffic.

Subsequent sections of Chapter 6 then outline the estimated traffic movements for each of the ports, harbours and airports individually, referencing the Vessel Management Plan (VMP) and Construction Programme (CoP) where appropriate. Although the estimated road traffic movements are acceptable to Transport Scotland, acknowledging the assumptions made in the TTP, it would be anticipated that the assessment of the effects of the traffic would consider the following:

- That estimated traffic numbers should be rounded up to the nearest whole number.
- That the summary would include reference to the road effected.
- That the cumulative impact of road traffic at each location would be considered, rather than by individual activity only.

Although a revised assessment would be preferred, it is acknowledged that the conclusions drawn from the TTP assessment would not be different i.e. that the percentage impact of the development would not exceed the established thresholds from IEMA.

Transport Scotland also acknowledge that the construction traffic effects will be temporary, and that no mitigation, to mitigate any significant impacts of construction traffic, is required. Nonetheless, we would expect to see a commitment to standard mitigation measures to ensure good practice is applied e.g.:

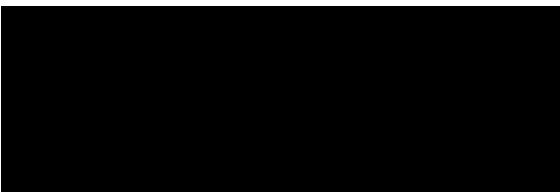
- The establishment of approved routes for associated HGV movements.
- The control of dirt and dust, from HGVs, to avoid any impact on the trunk road network during construction.
- The programming and timing of HGV movements to avoid peak periods.
- Avoiding HGV transit at school arrival and departure times.

Compliance with the Application, ES and SEIS

Transport Scotland note that onshore traffic effects were not required to be assessed in the Environmental Statement (ES) or Supplementary Environmental Impact Statement (SEIS), and subsequently no reference has been made to traffic management or a TTP in the ES and SEIS Commitments Register.

We trust the above is satisfactory but should you require any further information please do not hesitate to contact us.

Yours sincerely



Denise Angus

cc Alan Kerr – CH2M