Ref.: BFN_BEL_CST_LET_0009

Date: 2 April 2026

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Emma Lees
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Application by Bellrock Offshore Wind Farm Limited for Consent to Construct and Operate a Generating Station (the Bellrock Wind Farm Infrastructure) within the Bellrock Wind Farm Development Area

Electricity Act 1989 (as amended)

The Electricity (Applications for Consent) Regulations 1990 (as amended)

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)

Marine and Coastal Access Act 2009

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

Dear Emma,

Bellrock Offshore Wind Farm Limited (the "**Applicant**") is proposing to develop the Bellrock Offshore Wind Farm, an offshore wind farm with an export capacity of up to 1.8 GW (the "**Bellrock Project**").

This application is being submitted by the Applicant for consent under Section 36 of the Electricity Act 1989 for the construction and operation of an offshore generating station (the "**Bellrock Wind Farm Infrastructure**"), within the Bellrock Wind Farm Development Area (the **"Bellrock WFDA"**) as part of the Bellrock Project.

This letter is also accompanied by an application for a Marine Licence under the Marine and Coastal Access Act 2009 in relation to the Bellrock Wind Farm Infrastructure, consisting of:

- Wind turbine generators;
- Floating substructures;
- Station keeping systems (mooring lines and anchors) and associated scour protection as required;
- Inter-array cables and associated cable protection as required;
- Subsea cable hubs and associated gravel pad foundations; and
- Ancillary infrastructure including buoys.

Together the Section 36 Consent application and Marine Licence application are referred to in this letter as the **"Applications**".

Overview of the Bellrock Project

The Bellrock WFDA is located seaward of Mean High Water Springs in the Scottish offshore region. The Bellrock Windfarm Infrastructure is located within the WFDA and constitutes the generation component of the Bellrock Project.

The Bellrock WFDA site boundary is located 116 km southeast of Peterhead and 120 km east of Stonehaven and comprises an area of approximately 280 km^2.

The Offshore Transmission Infrastructure of the Bellrock Project will be located within the Bellrock Offshore Transmission Development Area (the "**Bellrock OfTDA**"), part of which will include the geographical extent of the Bellrock WFDA. The Offshore Transmission Infrastructure within the Bellrock OfTDA will include fixed bottom or floating offshore substations and associated scour protection, offshore reactive compensation station(s) and associated scour protection, interconnector cables and associated cable protection, offshore export cables and associated cable protection. The Offshore Transmission Infrastructure will be consented through a separate application for a Marine Licence.

The Onshore Transmission Infrastructure of the Bellrock Project will be located within the Bellrock Onshore Transmission Development Area (the "**Bellrock OnTDA**"). The Onshore Transmission Infrastructure within the Bellrock OnTDA will include transition joint bay(s), onshore export cables, an onshore substation, temporary construction compounds, temporary working areas, environmental mitigation areas, drainage/irrigation infrastructure, access works and other associated infrastructure.

At the time of scoping for the Bellrock WFDA, it was expected that the Bellrock Project's grid connection solution would be a co-ordinated connection to an SSEN Transmission offshore substation. However, in April 2025, the National Energy System Operator ("**NESO**") imposed a change to the grid connection design requiring the Bellrock Project to connect to the National Electricity Transmission System via SSEN Transmission's proposed Hurlie substation, to the west of Stonehaven in Aberdeenshire. The Onshore Transmission Infrastructure will be subject to a separate application for Planning Permission in Principle to Aberdeenshire Council.

As a result of this change, the site selection processes for the Bellrock OfTDA and OnTDA remain ongoing at the time of this Application, and it has been necessary for the Applicant to make a separate application for the Bellrock WFDA.

Section 36 Consent Validity

The Applicant is seeking a 7-year period from the date of any Section 36 Consent granted within which to commence development. This period is required to allow time for detailed post-consent design work, supply chain development and procurement activities ahead of construction of the Bellrock Wind Farm Infrastructure.

Description of the Works: Wind Farm Development Area

The Bellrock Wind Farm Infrastructure will comprise the following key components:

- Up to 132 wind turbine generators, each comprising a tower, nacelle, rotor assembly and blades, with associated floating substructures which will support the wind turbine generators (together termed as a "**floating offshore unit**");

- Maximum parameters of the wind turbine generators:
  - Maximum rotor blade tip height of 335 m (above sea surface);
  - Maximum rotor diameter of 300 m;
  - Minimum rotor blade clearance of 22 m (above sea surface);
  - Maximum hub height of 185 m (above sea surface); and
  - Minimum spacing between wind turbine generators of 1,150 m (measured centre to centre).
- Station keeping systems for each floating offshore unit, comprising mooring lines and anchors which will connect the floating offshore unit to the seabed, together with connectors and ancillary elements such as buoyancy elements, clump weights, shackles and connectors, and tensioners;
- Scour protection, as required, for the floating substructure anchoring points;
- Approximately 300 km of inter-array cables, comprising both dynamic and static sections, linking individual floating offshore units to subsea cable hubs or offshore substations (offshore substations being consented through a separate OfTDA Marine Licence application in due course);
- Associated cable protection, as required;
- Up to 18 subsea cable hubs; and
- Ancillary infrastructure including buoys.

Compliance with the EIA Regulations

An Environmental Impact Assessment ("**EIA**") Report has been prepared for the Wind Farm Infrastructure in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) Regulations 2007. The EIA Report has been submitted as part of the Application.

Where the technical chapters within the EIA Report identify a significant effect arising from the Wind Farm Infrastructure, secondary mitigation measures have been identified and the residual significance of effect is presented and stated as 'significant' or 'not significant' in EIA terms.

Table 1 below presents the final outcomes of each technical chapter for the EIA and Cumulative Effects Assessment (CEA) significance of effects assessments.

Table 1: Summary of the EIA and CEA Significant Effects Assessments

EIA Chapter	Bellrock WFDA – EIA Significance of Effects	Bellrock WFDA – CEA Significance of Effects
Chapter 6: Marine Geology, Oceanography and Physical Processes	No significant effects.	No significant cumulative effects.
Chapter 7: Benthic Ecology	No significant effects.	No significant cumulative effects.
Chapter 8: Fish and Shellfish Ecology	No significant effects.	No significant cumulative effects.
Chapter 9: Marine Mammals	No significant effects.	No significant cumulative effects.

EIA Chapter	Bellrock WFDA – EIA Significance of Effects	Bellrock WFDA – CEA Significance of Effects
Chapter 10: Offshore Ornithology	No significant effects.	No significant cumulative effects other than a potential significant adverse effect during operation, in relation to regional razorbill population as a result of disturbance and displacement impacts (noting that the Bellrock WFDA contribution to the cumulative total represents less than 1% of predicted mortality across all projects).
Chapter 11: Commercial Fisheries	No significant effects other than for UK demersal otter trawl fleet, targeting Nephrops (using TR2 gear), for which a significant (moderate) adverse effect is predicted. This is related to loss of access to a small portion of the Devil's Hole Nephrops grounds in the eastern area of the Bellrock WFDA, during all phases of the Bellrock Wind Farm Infrastructure.	No significant cumulative effects other than for UK demersal otter trawl fleet, targeting Nephrops (using TR2 gear), for which a significant (moderate) adverse effect is predicted. This is related to loss of access to a small portion of the Devil's Hole Nephrops grounds in the eastern area of the Bellrock WFDA, during all phases of the Bellrock Wind Farm Infrastructure.
Chapter 12: Shipping and Navigation	No significant effects.	No significant cumulative effects.
Chapter 13: Aviation and Radar	No significant effects.	No significant cumulative effects.
Chapter 14: Marine Infrastructure and Other Users	No significant effects.	No significant cumulative effects.
Chapter 15: Marine Archaeology and Cultural Heritage	No significant effects.	No significant cumulative effects.
Chapter 16: Socioeconomics, Tourism and Recreation	Potential significant beneficial effects in the local and Scottish economy at the construction and operation and maintenance ports, in relation to employment and gross value added (GVA). Potential significant effects during construction, and operation and maintenance at smaller ports due to increases in population, increases in housing demand, pressure on local services, and changes in the way people live, work, and interact with one another (socio-cultural effects). This will be managed through implementation of a Stakeholder Engagement Plan which will set out ongoing engagement, for example, with the local community, local authority and ports.	No significant cumulative effects. Minor beneficial effect in Scotland during construction in relation to employment and GVA.

EIA Chapter	Bellrock WFDA – EIA Significance of Effects	Bellrock WFDA – CEA Significance of Effects
Chapter 17: Greenhouse Gas Assessment	The Bellrock WFDA and the Bellrock Project as a whole, will provide a significant climate benefit during operation. No significant effects on blue carbon habitats.	No project specific cumulative assessment has been undertaken for the greenhouse gas assessment, the whole project assessment and the blue carbon loss assessment. Cumulative disturbance effects on blue carbon habitats have been assessed (as informed by Chapter 7: Benthic Ecology) and are not significant.
Chapter 18: Climate Change Risk	No significant effects.	Cumulative effects were scoped out.
Chapter 19: Major Accidents and Disasters	No significant effects.	CEA not required due to distance from other projects.

Compliance with the Habitats Regulations

A Report to Inform Appropriate Assessment ("**RIAA**") has been prepared for the Bellrock Wind Farm Infrastructure, based on the outcomes from the Habitats Regulations Appraisal ("**HRA**") Screening (assessment of likely significant effects). The RIAA will inform the Appropriate Assessment to be undertaken by Scottish Ministers in accordance with the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (collectively referred to as the "**Habitats Regulations**").

Derogation Case

Under the Habitats Regulations, where an adverse effect on the integrity of a European site cannot be excluded, the decision-maker may grant consent for a project where there are no alternative solutions, the project must be carried out for imperative reasons of overriding public interest ("IROPI"), and subject to compensatory measures being taken to ensure that the overall coherence of the European site network is protected. These three tests – no alternative solutions, IROPI, and compensatory measures – form the Derogation Case on which the Scottish Ministers should be satisfied before granting consent for the Bellrock WFDA.

Conclusions reached in the RIAA have identified the potential for in-combination adverse effects on integrity for kittiwake, razorbill and gannet. In view of these conclusions, it is necessary to provide the requisite information and justification within the Derogation Case to satisfy the derogation provisions of the Habitats Regulations in respect of the species for the Special Protection Areas ("**SPAs**") identified. The Derogation Case is included as part of this Application and provides robust and sufficient information to allow the Scottish Ministers to grant the applications for the Bellrock WFDA in accordance with the Habitats Regulations.

The Applicant has also provided a without prejudice Derogation Case in respect of puffin. These submissions are without prejudice to the Applicant's position that it can be concluded beyond reasonable scientific doubt that the Wind Farm Infrastructure would not give rise to adverse effects on integrity, either alone or in combination with other plans and projects, in respect of those species for the SPAs identified.

The Derogation Case identifies compensatory measures in accordance with the requirements of the Habitats Regulations. This includes measures such as mammalian predator control and management, fisheries management – specifically bycatch reduction, reduction of anthropogenic disturbance at breeding colony and management of breeding habitats.

Scottish and UK Governments have published proposals and undertaken consultation on the establishing of a scheme to deliver compensatory measures for offshore wind farms at a strategic level. In 2025, the Scottish Government undertook consultation on a Scottish Marine Recovery Fund (SMRF) and in December 2025 confirmed, in the associated consultation analysis report, that the SMRF will open as soon as practicable, subject to completion of the required policy work and relevant legislation to establish the SMRF.

At this stage, the timeframe or arrangements for the implementation of the SMRF is not known, although it is understood that this could be in place prior to any compensation delivery requirement for the Bellrock WFDA. Therefore, subject to confirmation of suitability to the Bellrock WFDA and the financial viability of any proposed tariff, the Applicant expresses interest in addressing the Bellrock WFDA compensation requirements through the SMRF when it becomes available.

Documents Enclosed

The documents submitted as part of the Applications for the Bellrock WFDA comprise:

- Volume I: EIA Report Non-technical Summary;
- Volume II: EIA Report Chapters;
- Volume III: EIA Report Figures;
- Volume IV: EIA Report Appendices;
- Volume V: Management Plans;
- Volume VI: Shadow Habitats Regulations Appraisal (comprising the Report to Inform Appropriate Assessment and Shadow HRA Derogation Case);
- Volume VII: Report to Inform Nature Conservation Marine Protected Area Assessment; and
- Supplemental Information: Comprising this cover letter for an application for Section 36 Consent and Marine Licence for the Bellrock WFDA; a Marine Licence application form for the Bellrock WFDA; a location plan; and a Planning Statement.

Offshore Transmission Infrastructure

The Offshore Transmission Infrastructure associated with the Bellrock Project will be subject to a separate application for a Marine Licence under the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010. This application will also be submitted to the Marine Directorate - Licensing Operations Team ("**MD-LOT**").

Onshore Transmission Infrastructure

The Onshore Transmission Infrastructure associated with the Bellrock Project will be subject to a separate application for Planning Permission in Principle under the Town and Country Planning (Scotland) Act 1997. This application will be submitted to Aberdeenshire Council as planning authority.

Public Notices/Advertisements

Public notice advising that the Applicant has submitted applications for a Section 36 Consent and Marine Licence to MD-LOT, and inviting the public to submit comments on the Application, will be placed in the following publications on dates to be agreed with MD-LOT:

- The Edinburgh Gazette;
- The Herald;
- Buchan Observer;
- Mearns Leader and Kincardineshire Observer; and
- Fishing News.

The adverts will advise members of the public on how to participate in the consultation on the Application, in accordance with the Marine Works (Environmental Impact Assessment) Regulations 2007, the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990.

Copies of the Application, including plan(s) showing the area to which the applications relate, together with a copy of the EIA Report presenting the Wind Farm Infrastructure in further detail and an analysis of the environmental implications, will be available for inspection electronically at the following locations:

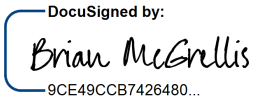
Location	Address	Opening Hours
Peterhead Library	Peterhead Leisure and Community Centre Balmoor Terrace Peterhead AB42 1EP	▪ Tuesday: 9 am – 6 pm ▪ Wednesday: 9 am – 6 pm ▪ Friday: 9 am – 5 pm ▪ Saturday: 10 am – 2 pm
Stonehaven Library	Evan Street Stonehaven AB39 2ET	▪ Tuesday: 9 am - 6 pm ▪ Wednesday: 9 am – 5 pm ▪ Friday: 9 am – 5 pm ▪ Saturday 10 am – 2 pm

Once the Application has been accepted by MD-LOT, the Application documents will also be published online on the Applicant's website: www.bellrockwind.co.uk

Hard copies of the Application documents can also be made available on request to the Applicant, subject to a charge of £1,500 (inclusive of postage and packing). Alternatively electronic copies of the Application documents (on USB) can also be made available on request to the Applicant, subject to a charge of £10 (inclusive of postage and packing). Hard copies of the Non-technical Summary of the EIA Report are also available free of charge. Requests for copies of the Application documents can be made by email to bellrockwind@nadara.com

We look forward to hearing from you in relation to the formal acceptance of the Application.

Yours sincerely,



Brian McGrellis

Head of Consents and Land

For Bellrock Offshore Wind Farm Limited